

cution of presenting this smooth and convincing narrative in the form of evidence is obvious. The defendant is then caught in a trap. If he says nothing, this hearsay account of the crime will be used against him on the trial. It will amount virtually to a confession. If he denies the truth, he will be plied with further questions, to some of which he must answer or take the consequences of the evidence being used against himself, and the whole proceedings will inevitably get before the jury to enable them to understand the answers given. If a proposal were made to the people of this State to give the defendant an opportunity to speak on being brought before the magistrate immediately after his arrest, it would be strenuously opposed as a violation of the rights of the accused person. But a decision, as in the principal case, will pass unquestioned, although it gives an added advantage to the extra-legal, secret, unprotected inquisition in the sheriff's or district attorney's office. It will be no longer sound advice for a lawyer to advise his client to say nothing. If this does not compel a defendant to criminate himself, what would?

—*California Law Review.*

REVIEW OF CURRENT ENGLISH CASES.

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NUISANCE—NEGLIGENCE—DANGEROUS TRADE—MANUFACTURE OF
HIGH EXPLOSIVES—EXPLOSION CAUSING DAMAGE TO ADJACENT
PROPERTY—LIABILITY OF MANUFACTURER—DIRECTORS.

Belvedere Fish Guano Co. v. Rainham Chemical Works (1920)
2 K.B. 487. This was an action against a company and two of
its directors to recover damages for injury to property occasioned
by an explosion on the defendant company's premises. As to
the liability of the company there was not much question, but the
principal contention was in regard to the personal liability of
the directors. These two directors had made a contract with
the Minister of Munitions to manufacture for him picric acid,
according to a process in which these directors had proprietary
rights. For the manufacture, di-nitro-phenol (D.N.P.) was a
necessary ingredient. The directors secured premises and