nay, 60 Law J. Rep. Q. B. 231, where the defendant uttered defamatory words about the plaintiff which were not actionable unless special damage was proved. The plaintiff's mother repeated them to the plaintiff, and she told them to a man to whom she was engaged, and who, she alleged, broke off the engagement in consequence. She then sought to make the defendant liable in damages for the slander which he had uttered. The curious point to observe is, that the plaintiff herself was part of the chain by which the slander got to her lover, and 'every repetition of a slander is a wilful publication of it, rendering the speaker liable to an action' (Odgers, p. 162). In *Parkins* v. *Scott*, 31 Law J. Rep. Exch. 331: 1 Hurl. & C. 153, Baron Bramwell said: 'Where one man makes a statement to another, and that other thinks fit to repeat it to a third, I do not think it reasonable to hold the first speaker responsible for the ultimate consequences of his speech. If I make a statement to a man, I know the consequences of making it to him when I make it; but if I do not desire, and do not authorize the man to whom I make it, to repeat it, but he does it, am I to be liable for the consequences of his so doing? The learned baron might have added an *à fortiori:* Am I to be liable when the slandered person herself brings about the catastrophe by repeating the defamation, when she might have kept silence on the subject? In that case a wife repeated to her husband some vile abuse which another woman had uttered to her, with the result that he would no longer live with her. The Exchequer Division, holding that there was no moral obligation on the wife's part to repeat it, held that the original slanderer was not liable. The Court of Appeal in the recent case came to a similar conclusion. 'Here the words,' said Lord Justice Lopes, 'were untrue, and the mother must have known that they were untrue, and there could not be any obligation either on the mother or the daughter to repeat them to Galloway' (the lover). His lordship also pointed out that there were four classes of cases where the original slanderer could be made liable for the repetition of the slander, viz.: (1) Where he authorized the repetition, (2) where he intended it, (3) where the repetition was the natural consequence of the uttering, and (4) where there was a moral obligation on the person to whom he uttered it to repeat it. This case fell within none of those classes.—*Law Journal* (*London.*)

GENERAL NOTES.

FORGOTTEN DEPOSITS.—The Bank of England is the custodian of a large number of boxes deposited by customers for safety during the past two hundred years, and in not a few instances forgotten. Many of these consignments are not only of rare intrinsic and historical value, but of great romantic interest. For instance, some years ago the servants of the bank discovered in its vaults a chest which on being moved literally fell to pieces. On examining the contents, a quantity of massive plate of the period of Charles II. was discovered, along with a bundle of love letters indited during the period of the Restoration. The Directors of the bank caused search to be made in their books, the representative of the original depositor of the box was discovered, and the plate and love letters handed over —*Chambers' Journal.*

CIRCUMSTANTIAL EVIDENCE.—Mr. George Kebbel sends to the London *Times* the following story of circumstantial evidence, narrated to him by a client: He was, some years ago, a passenger to the Cape, and one day at dinner a fellow passenger produced a very old but valuable coin. It was handed round, and suddenly disappeared. Every effort to find it failing, it was suggested that all the passengers should turn out their pockets. They did so with the exception of my client, who declined, and for the remainder of the voyage was boycotted. Just as the vessel got into port the coin was found in a remote corner of the saloon. My client had an exactly similar coin in his pocket, and dared not say so at the time of the loss, because he knew his story would have been simply laughed at.

CONSULAR FEES.—The very high consular fees levied by some countries, and more especially by the Consulates of Transatlantic States, which have gradually become a very serious burden for persons engaged in trade with those countries, have recently, at the instance of a Bordeaux representative of a large British steamship company, induced the Chamber of Commerce at Bordeaux to urge upon the French Government the desirability of concluding an international convention amongst all civilized States, by which a maximum limit should be fixed, beyond which no Government should in future be allowed to charge fees for consular services rendered by its representatives residing in other countries. "There can be no doubt," says the British Consul at Bordeaux, "that a convention of this nature would be beneficial to trade in general, and that a reduction of the consular fees charged at present by many countries would be highly desirable. Many States at present levy such high fees for consular attestations on invoices and other documents connected with the importation of goods from foreign countries that these fees have become merely another form of import duties, though they do not appear in the Customs tariff of the States in question."