

are both servants of the same master. It is not sufficient that the injury occurs whilst they are engaged in the same work. In this case the appellants made a contract with stevedores to unload a ship, and engaged, on their part, to provide winch drivers to manage and work the lifting apparatus. These men were paid by the appellants, and there was nothing in the contract to show that while engaged in the unloading they were to be deemed servants of the stevedores, or that the latter were to have any control over them. Claridge, one of the servants of the stevedores, was injured, owing to the negligence of one of the winch drivers, and the defence of common employment was held not to be applicable. The judgment of the Court of Appeal of New Zealand was, therefore, affirmed.

B.N.A. ACT, SS. 91, 92—LOCAL LEGISLATURES, POWERS OF—BANKRUPTCY—R.S.O., c. 124, s. 9.

*The Attorney-General of Ontario v. The Attorney-General of Canada*, (1894) A.C. 189, has already been discussed at length (see *ante* p. 182). It is only, therefore, necessary to say here that the Judicial Committee of the Privy Council (the Lord Chancellor, Lords Watson, Macnaghten, and Shand, and Sir R. Couch, have held that the provisions of R.S.O., c. 129, s. 9, are merely auxiliary to a bankruptcy law, and, as such, are *intra vires* of the Provincial Legislature, so long as they do not conflict with any legislation of the Dominion Parliament on the subject of bankruptcy. This, we may observe, is another case in which the decision of the Privy Council must approve itself to the judgment of the legal profession as an able and well-reasoned solution of a somewhat difficult problem.

The Law Reports for June comprise (1894) 2 Q.B., pp. 1-188; (1894) P., pp. 189-220; and (1894) 2 Ch., pp. 1-183.

BILL OF SALE—REGISTRATION—SALE OF GOODS BY HUSBAND TO WIFE—RECEIPT—POSSESSION—HUSBAND AND WIFE.

*Ramsay v. Margrett*, (1894) 1 Q.B. 18; 9 R., June, 189, is a decision of the Court of Appeal under the English Bill of Sales Act, 1878 (41 & 42 Vict., c. 31), and inasmuch as that Act differs in many respects from the R.S.O., c. 125, it is somewhat difficult to apply English cases in the construction of the latter Act. In this case the transaction in question arose between husband and wife, who were living together. The husband was in embarrassed