

The addition of the word "trustee" to the name of the payee of a note is held, in *Fox v. Citizens Bank & T. Co.* (Tenn.) 35 L.R.A. 678, not to destroy its negotiability. The other authorities on this question are reviewed in the annotation to the case.

The holder of a note who takes it entirely on the security of a policy of life insurance, although it is technically delivered prior to maturity, is held, in *Hays v. Lapeyre* (La.) 35 L.R.A. 647, to be entitled to hold the note only for the amount advanced upon it, with interest. The annotation to this case considers the negotiability of a note payable out of a particular fund.

The indorsement by the maker of a note which is payable to his own order is held, in *Ewan v. Brooks-Waterfield Co.* (Ohio) 35 L.R.A. 786, not to be an indorser in the legal sense of the term, but only a maker, and the note is held to be in legal effect payable to the holder or bearer. In such a case an indorsement in blank by another party before the note is delivered is held to make the latter a *prima facie* surety of the maker.

*Railway.*—A railroad company selling coupon tickets over connecting roads is held, in *Chicago & A. R. Co. v. Mulford* (Ill.) 35 L.R.A. 599, to be presumably a mere agent for the connecting companies, and not liable for the failure of the latter to honor the tickets.

A person at a flag station at which there is no ticket office, who has signified an intent to get upon a passenger train that has actually stopped there, is held, in *Western & A. R. Co. v. Voils* (Ga.) 35 L.R.A. 655, to be entitled to the rights of a passenger.

The negligence of a passenger in stepping on a train when it is going two or three miles an hour is held, in *Distler v. Long Island R. Co.* (N. Y.) 35 L.R.A. 762, to be a question for the jury.

The duty of furnishing a separate passenger train for passengers only, and not for freight and passengers together, is held, in *People ex rel. Cantrell v. St. Louis, A. & T. H. R. Co.* (Ill.) 35 L.R.A. 656, to be implied in the duty of a railroad company to furnish necessary rolling stock and equipment for the suitable operation of the road. The sufficiency of earnings to justify the expense of such a train is held to depend on the earnings of the entire system, and not of the mere branch over which the train is to run.