Mr. Davis remonstrated with the photographer, the latter refused to remove the picture and the objectionable sign from his window, and high words ensued. Soon after another portrait of Miss Edna appeared in the window, with this derisive motto appended: "My pop thinks he owns the earth." This, the legal paper said, "insinuated that the said Edward A. Davis was an overbearing, avaricious, dishonest man, claiming more than he was lawfully entitled to." Even after this Mr. Davis took no more severe measures than remonstrance with the photographer. More high words ensued, and the next addition to the free art gallery in the window was a picture of Mr. Davis himself, with the inscription: "All cowards carry a gun; I hear that you carry one." This settled the business, and Mr. Davis decided to bring suit, with the result that the photographer is now held in $1,000 bonds to await the outcome of the trial.—*Buffalo Enquirer.*

LIABILITY OF BANK DIRECTORS.—The decision of the Supreme Court of the United States in *Briggs* v. *Spaulding* (141 U. S. 132), rendered by a divided court, is already bearing its crop of fruit. That decision held that the directors of a bank were not liable for losses of its assets under circumstances which, to an ordinary mind, ought to be characterized by the epithet gross negligence. In *Swenzel* v. *Penn Bank* (23 Atl. Rep. 505), the Penn Bank of Pittsburg, had been completely wrecked and gutted by its unfaithful servants, in the year 1884. The principal rascal was Riddle, its president. He proceeded with the knowledge of the cashier and the co-operation of one or more clerks and subordinates. He literally emptied the vaults of the bank in carrying on a gigantic speculation in oil. Nevertheless, the Supreme Court of Pennsylvania hold that the directors were not under an obligation to know this, and that they are not personally liable for not knowing it and preventing it. The New York Court of Appeals (*Hun* v. *Cary*, 82 N. Y. 65) has declared that the standard of diligence required of the trustees or directors of a corporation is that degree of care and prudence which men, prompted by self-interest, generally exercise in their own affairs; and it concedes that they are liable for that gross breach of duty which the civilians call *crassa negligentia.* (*Hun* v. *Cary*, 82 N. Y. 65; *Brinkerhoff* v. *Bostwick*, 88 N. Y. 52). Such also is the doctrine of the Supreme Court of Pennsylvania in an earlier case, (*Spering's Appeal*, 71 Pa. St. 11) which may properly be regarded as the leading American case on this question.—*Am. Law Review.*