wards declared bankrupts, and the plaintiff was appointed trustee in bankruptcy. The defendants having discovered the fraud went to the pawnbroker and redeemed the goods of which they then claimed to retain possession as against the plaintiff. The present action was then brought in which the plaintiff claimed the goods or the value thereof less the amount paid by the defendants to the pawnbroker for the redemption; but Hamilton, J., who tried the case, came to the conclusion that the defendants, on discovering the fraud of Kirkness & Sons, were entitled to disaffirm the contract and retake possession of the goods even after the bankruptcy order had been made, and that they were entitled to set-off the damages they had sustained by the fraud (in this case the amount they had had to pay the pawnbroker) against the part of the purchase money which they had received from Kirkness & Sons.

DISCOVERY—EXAMINATION OF DEFENDANT FOR DISCOVERY LIBEL—INNUENDO—INTERROGATORY AS TO THE MEANING IN WHICH DEFENDANT USED WORDS COMPLAINED OF.

Heaton v. *Goldney* (1910) 1 K.B. 754 was an action for libel, in which the plaintiff claimed to examine the defendant for discovery, as to the meaning in which he used the words complained of in the action. Bucknill, J., held that such an interrogatory was admissible; but the Court of Appeal (Williams and Farwell, L.JJ.), held that it was not, on the ground of want of precedent, and as being oppressive; but inasmuch as the object of all examinations for discovery is to draw, if possible, from the party examined admissions which will support the opposite party's case, the reasons for disallowing the interrogatory in question do not seem particularly cogent.

ADMIRALTY—COLLISION—DAMAGE—SOUND SIGNALS.

The Curran (1910) P. 184. This was an appeal from the decision of Deane, J., finding the appellant guilty of negligence causing a collision. The appeal was on the weight of evidence. It was proved that the other vessel had sounded fog signals, but the appellants proved that they had not heard them until within a very short distance, too late to prevent the collision; in these circumstances Deane, J., held that the failure to hear the signals was evidence of there not being a proper look-out; and the Court of Appeal (Lord Halsbury, and Moulton, and Farwell, L.JJ.) declined to interfere with his decision.