

damage, mis-delivery, delay, or detention." unless arising from the wilful misconduct of their servants, but not from any liability they might otherwise incur in the case of "non-delivery of any package or consignment fully and properly addressed," and that "no claim in respect of goods for loss or damage during the transit" should be allowed unless made "within three days after delivery of the goods in respect of which the claim is made, or in the case of non-delivery of any package or consignment, within fourteen days after despatch." The goods in question consisted of a quantity of carcasses, and on the arrival of the consignment at its destination some of them were missing, for which the plaintiffs made a claim within fourteen days of the despatch of the consignment. The majority of the Court of Appeal (Buckley, and Pickford, L.JJ.) agreed with the Divisional Court that the non-delivery of part of the consignment was "non-delivery of the consignment" within the meaning of the contract, and that the claim was made in time, and that the plaintiff was entitled to recover damages therefor. Phillimore, L.J., dissented, on the ground that he thought that as the bulk of the consignment was delivered the claim for shortage should have been made within three days after its delivery, and that it was only where the whole consignment was not delivered that 14 days was allowed for making the claim.

PRINCIPAL AND AGENT—SOLICITOR AND CLIENT—ORDER FOR PHOTOGRAPHS FOR DEFENCE OF CLIENT—LIABILITY OF SOLICITOR—KNOWLEDGE THAT SOLICITOR IN GIVING ORDER IS ACTING FOR A CLIENT.

*Wakefield v. Duckworth* (1915) 1 K.B. 218 is a case which will be of interest to the profession, inasmuch as the Divisional Court (Coleridge and Shearman, JJ.) have decided that where a solicitor orders photographs to be made for the purposes of a client's defence, and the photographer knows that the solicitor is acting for a client, the solicitor incurs no personal liability to pay for such photographs.

WILL—TRUST—LIFE INTEREST—PROVISION FOR CESSER IN CASE OF ATTEMPT TO ALIENATE—INCOME ACCRUING BEFORE BUT NOT RECEIVED TILL AFTER ALIENATION—APPORTIONMENT ACT (33-34 VICT. c. 35), s. 2—(R.S.O. c. 156, s. 4).

*In re Jenkins, Williams v. Jenkins* (1915) 1 Ch. 46. In this case it was attempted to apply the Apportionment Act (33-34 Vict. c. 35), s. 2 (see R.S.O. c. 156, s. 4), in the following circum-