on them to maintain such bridges in "sufficient repair." The bridges were erected and approved by the Commissioners appointed for the purpose. By reason of an increase in traffic the bridges had become inadequate, and the action was brought to compel the defendants to make them sufficient for present-day traffic. Phillimore, J., who tried the action, held that the defendants' duty did not require them to maintain the bridges for any greater traffic than existed when they were erected in 1791 (1913, 1 K.B. 422); but the Court of Appeal (Williams, Kennedy, and Eady, L.JJ.) considered that the defendants' statutory duty required them to maintain the bridges fit to carry the traffic as it from time to time existed, and therefore they were bound to put them in condition to carry the existing traffic.

COAL MINE—SUPPLY OF EXPLOSIVES—"ACTUAL NET COST TO OWNER."

Evans v. *Gwendraeth Colliery Co.* (1914), 3 K.B. 23. Coal mine owners by statute are required to furnish their employees with explosives at a price not to exceed "the actual net cost" to the owner. The Court of Appeal (Lord Reading, C.J., and Kennedy, and Eady, L.JJ.) hold that these words include not only the cost of carriage to the owner's magazine, but also the cost of distribution from his magazine to his workmen and the decision of Channell and Coleridge, JJ. (1913, 3 K.B. 100) to the contrary was reversed.

PRACTICE—COSTS—TAXATION—SEPARATE ISSUES OF LAW AND FACT—PLAINTIFF SUCCESSFUL ON FACTS—DEFENDANT SUCCESSFUL ON LAW—DISMISSAL OF ACTION WITH COSTS—OMISSION OF COURT TO GIVE ANY SPECIAL DIRECTIONS—POWERS OF TAXING OFFICER.

Ingram v. *Services Maritime* (1914), 3 K.B. 28. In this action issues of law and fact were raised. The plaintiffs succeeded on the questions of fact, but the defendants succeeded on the point of law and the action was dismissed with costs. No directions were given as to the costs of the issue of fact on which the plaintiffs had succeeded. On the taxation of the costs the plaintiffs claimed that their costs of the issue on which they had succeeded should be taxed and deducted from the defendants' costs. The taxing Master held that in the absence of specific directions so to do, he had no power. Bailhache, J., held that he had, but the Court of Appeal (Eady, and Phillimore, L.JJ.) decided that the taxing officer was right.