

his goods. The right of lien of an innkeeper depends upon the fact that the goods come into his possession in his character of innkeeper as belonging to a guest." His lordship also pointed out that the lien would attach even if Mr. Silber had stolen the goods. Few will deny the reasonableness of this decision, and it is comforting to feel that, while married women are acquiring new rights, they are not able to shirk the correlative liabilities. It seems that in old days it was even doubtful whether the person of the guest could not have been detained when the bill was not paid, but there is now no doubt that this is not the law ("Cross on Lien," p. 343). The innkeeper is liable, as we have stated, for the safety of his guest's goods, but the relation of landlord and guest must be established before the liability will be incurred. This is shewn by the case of *Strauss v. The County Hotel and Wine Company*, 53 Law J. Rep. Q.B., 25; L.R. 12 Q. B. Div., 27. There the plaintiff arrived by train at Carlisle Station, and entrusted his luggage to a porter to be conveyed to an hotel belonging to the defendant company, where he intended to stay. A telegram which he received shortly after his arrival made him change his mind, but he took some refreshments, on the waiter's suggestion, in the refreshment room which forms part of the station, but belongs to, or, at all events, is under the management of the defendants, and is directly connected with the hotel by a covered way. He had previously directed the hotel porter to lock up his luggage. Later on the same day the plaintiff discovered that part of his luggage was lost, and he brought this action to make the proprietors of the hotel liable for it as innkeepers. "We do not," said the present Lord Chief Justice, in deciding against the plaintiff, "at all lay it down that no action would lie against the defendants as bailees if the loss were occasioned under such circumstances as would make them liable. No such question arises here, and what we decide is that there is no evidence here to establish the relationship of landlord and guest, which is necessary in order to make the defendants liable as innkeepers." Mr. Justice Mathew referred to the plaintiff's contention that the relationship of landlord and guest had been established either with the porter at the station or with the waiter in the coffee-room, but held that there was no evidence of the relationship contended for.—*Law Journal*.

CHINESE COURTS.—The course of American politics, we usually acknowledge, is like a stream flowing over shifting sands—liable to get a little muddy and sometimes to change its channel; but in contrast to this we point to our courts of justice, apart from turmoil, inaccessible to bribes, unswerved by the stress of party conflict. The Chinese have studied these courts, and though they can hardly pretend to have mastered the mysteries of their intricate apparatus, it strikes our critics that no system could be more skilfully designed for the purpose of defeating justice. A court consists of three elements—bench, bar, and jury, the second and third apparently serving no other ends than to prevent law and to screen the guilty. In China, where there is neither bar nor jury, the processes of law are not only more expeditious, but as the Chinese assert, more certain. In their eyes the jury is open to three objections: (1) while the weigh-