

application on the ground that they were "purchasers for value" within s. 47 of the Bankruptcy Act, which avoids voluntary settlements made within two years before the bankruptcy, but Wright, J., held that they were not, and set aside the deed so far as necessary for the payment of the debts in the bankruptcy.

DEFAMATION—SLANDER—SPECIAL DAMAGE—DAMAGE TOO REMOTE.

Speake v. Hughes (1904) 1 K.B. 138, was an action of slander brought in respect of a statement made by the defendant to the plaintiff's employers to the effect that the plaintiff had removed from premises leaving rent due to his landlord, the plaintiff alleging that in consequence of such statement he had been dismissed from the service of his employers. The case was tried in the Liverpool Court of Passage and dismissed, and the Court of Appeal (Collins, M.R. and Mathew, and Cozens-Hardy, L.JJ.) affirmed the decision on the ground that the special damage alleged was too remote.

CRIMINAL LAW—FALSE PRETENCES—FRAUD—EVIDENCE OF PREVIOUS ACTS.

King v. Wyatt (1904) 1 K.B. 188, was a prosecution for obtaining goods by false pretences. The prisoner had gone to the prosecutrix's house and got her to receive him as a lodger and incurred a bill of 14 s. 6 d., which he was unable to pay. It was proposed to call witnesses to prove that the prisoner had been at an hotel and other lodging houses and in like manner incurred bills and left without paying. The evidence was admitted subject to an objection to its admissibility, and the prisoner was convicted. On a case stated the Court (Lord Alverstone, C.J., and Wright, Kennedy, Darling, and Phillimore, L.JJ.) held that the evidence was admissible as shewing a course of conduct on the part of the prisoner, and his conviction was affirmed.

WEIGHTS AND MEASURES—SCALES—WEIGHT INDICATED EXCEEDING TRUE WEIGHT—ACQUIESCENCE OF PURCHASER—"FALSE OR UNJUST"—WEIGHTS AND MEASURES ACT, 1878 (41 & 42 VICT., c. 49) s. 25—R.S.C. c. 104, s. 25.

In *London County Council v. Payne* (1904) 1 K.B. 194, the defendants, who were wholesale tea merchants, were summoned for having scales which were "false and unjust," contrary to s. 25