obligation, or a bailment. And the reader may have concluded, and we think correctly, that the traveller in the first case would have had to suffer the loss if the place he had gone to had not been an inn, because he did not deliver his overcoat to the innkeeper or one of the servants, and, as every lawyer knows, and the derivation of the word "bailment" suggests, delivery of the chattel in trust is essential to a bailment of it. In the second case a small cloak-room charge might have been demanded and paid; and, therefore, it will be useful to recall that a bailment may be either for reward or gratuitous, and that this distinction affects, and very reasonably so, the degree of diligence which is expected of the bailee. And whenever the place is not an inn, it may be worth considering whether the responsibilities of a boarding-house keeper, or at least some of them, which were a few years ago discussed and enunciated in a case in the Court of Appeal *Scarborough* v. *Cosgrave*, 93 L.T. Rep. 530; (1905) 2 K.B. 805), do not also attach to the proprietor of the establishment in question; and further to bear in mind that if liability for injury or loss exist, it would not be limited to £30.

It appears, then, that in a case of customary liability, a plaintiff has to, if it be possible, prove he visited an inn (see *Thompson* v. *Lacy*, 3 B. & Ald. 286), and that the relationship of innkeeper and guest, in the legal sense of these terms, arose. In this connection we would point out that when Mr. Justice Wills stated (*Orchard* v. *Bush and Co.*, *ubi sup.*) that, from the point of authority, he did not think that there was much to be said for the proposition that the term "guest" is to be limited to a wayfarer, and that the liability of an innkeeper arises whenever he receives a person *causâ hospitandi* or *hospitii*, it was *obiter*, as the plaintiff in the case was held to be, and clearly was, a traveller; and, with great respect for that learned judge, we must add that this dictum appears to be inconsistent with other cases (*e.g.*, *Burgess* v. *Clements*, 4 M. & S. 306; *Reg.* v. *Rymer*, 35 L.T. Rep. 774; 2 Q.B. Div. 136; *Lamond* v. *Richards*, 76 L.T. Rep. 141; (1897) 1 Q.B. 541). We should be glad if the meaning of the term came again shortly for consideration and judgment; as we are inclined to think it is still arguable that a person who dines at an inn