

CARRIERS.—A passenger who accepts from a carrier's agent a ticket for interstate passage at a through rate which, under the rules of the Commission, does not allow stopover privileges, is held in *Melody v. Great Northern R. Co.* (S.D.) 30 L.R.A. (N.S.) 568, not to be entitled to hold the carrier liable in damages for his expulsion from the train in case he attempts to exercise such privileges, although the marks necessary to shew the limited character of the ticket are not placed upon it.

That no recovery can be had for the death of one thrown by a jerk from the top of a car, on which he was riding in preference to riding with the crowd within, in the absence of anything to shew that the jerk was so violent as to shew want of proper care in the operation of the train, is declared in *Patterson v. Louisville & N. R. Co.* (Ky.) 30 L.R.A. (N.S.) 425.

That it is not negligence per se for a passenger to ride upon the step of the platform of an electric street railway car is declared in *Trussell v. Morris County Traction Co.* (N.J.) 30 L.R.A. (N.S.) 351.

That one injured by attempting to alight from a street car moving at the rate of 6 miles an hour was a foreigner, recently arrived in this country, and that he did not understand English, and was inexperienced in street car travel, but had seen other passengers leave moving cars, is held in *Fosnes v. Duluth Street R. Co.* (Wis.) 30 L.R.A. (N.S.) 270, not to relieve him from the charge of contributory negligence in making the attempt.

CONTRACTS.—A contract by a manufacturer of dishes to fill an order for a certain number, bearing the monogram of the purchaser, is held in *Re Gies* (Mich.) 30 L.R.A. (N.S.) 318, to constitute a contract for work and labour, not within the statute of frauds, where the value of the undecorated dish is a small part of the final cost, although compliance with the contract will result in a sale of the dishes.

A contract to secure evidence of a given state of facts, which will permit the winning of a lawsuit, is held in *Neece v. Joseph* (Ark.) 30 L.R.A. (N.S.) 278, to be void as against public policy.

Agents of a foreign corporation which was organized for legitimate business purposes, and has fully complied with the laws entitling it to do business in the state, are held in *International Harvester Co. v. Smith* (Mich.) 30 L.R.A. (N.S.) 580, to have no right to defeat an action by it to compel them to pay over money belonging to it, arising from goods sold and collections made on the theory that it is a trust or monopoly, either at common law or under a statute making illegal contracts in re-