INSURANCE—BURGLARY AND HOUSEBREAKING—LOSS BY THEFT—ACTUAL FORCIBLE AND VIOLENT ENTRY—BUSINESS PREMISES—BREAKING INTO ROOM—ENTRY BY SLIDING BACK LOCK WITH INSTRUMENT.

In re Calf and Sun Insurance Co. (1920) 2 K.B. 366. This was an arbitration proceeding arising out of a policy against burglary and housebreaking. The premises insured were certain rooms in a house used as a shop and workrooms of the insured, who carried on business as a tailor. A thief got into the coal cellar under the shop in the day time, which as the Court held was not part of the premises insured, and at night, from thence made his way into one of the work rooms by sliding back the lock with an instrument, and from thence he got into the shop, and was thus enabled to steal and carry away goods from the insured premises. The arbitrator came to the conclusion that as the thief had entered the coal cellar without violence, it was unnecessary to consider the nature of his subsequent entry into the insured premises, and he made an award in favour of the insurance company, and Bailhache, J., held that the arbitrator had come to a right conclusion, but the Court of Appeal (Bankes, Atkin, and Younger, L.JJ.) held that there had been a forcible entry into the insured premises by the forcing of the lock, and that even if the whole building had been insured, Atkins and Younger, L.JJ. were of the opinion that the breaking into one room would have been a forcible and violent entry within the meaning of the policy.

BASTARDY — CORROBORATION — EVIDENCE — BASTARDY LAWS AMENDMENT ACT, 1872 (35-36 VICT. C. 65, S. 4—(R.S.O. C. 154, S. 2 (2)).

Thomas v. *Jones* (1920) 2 K.B. 399. This was a case stated by justices. Thomas was charged with being the father of an illegitimate child of Miriam Jones. Thomas was a farmer, and Jones his housekeeper. The child was born in his house, and on the day of its birth, having no other female servant, he lit a fire for her, and took her some tea and brandy, and sent for a doctor. After the birth he allowed the girl and her child to remain in his house five weeks, and he admitted that he had never asked the girl who was the father of the child. After she left his house she wrote charging him with being the father, and asking him if he meant to pay for its maintenance. A Divisional Court (Lord Reading, C.J., and Roche and Avory, JJ.) held (Avory, J. dissenting) that though none of the above facts alone would be sufficient corroboration of the girl's charge, yet their cumulative effect was sufficient corroborative evidence.