making of the will. The jury found for the will.—Probate Division, April 25th, &c., 1898 (Mr. Justice Barnes).—*Times*, April 28th.

Another illustration of the tenacity with which juries will cling to a will. Hostility to his wife was a prominent element in the testator's delusions. The effect of the will was to prejudice the wife's interests. Yet the jury upheld the will.

Donald Ross v. William Ross's Trustees and Others.

A probate case. The pursuer, D. Ross, sought reduction of the will of his brother, W. Ross, on the grounds that the testator was of unsound mind and incapable of managing his affairs, and that the will was impetrated from him when he was weak and facile by the defenders. The evidence was of the usual contradictory character, and the judge summed up strongly for the will; but the jury, notwithstanding, found a verdict upsetting the will, but exonerating the defenders.—Court of Session (the Lord President), March 14th and 15th, 1898.—*Scotsman*, March 15th and 16th.

This case shows that it is very much easier to upset a will in Scotland than in England. In England the "pursuer" would have been very ill advised to bring an action, and would certainly have lost it.

Spence v. Spence.

This was a probate action, the will being disputed on the usual grounds. It was proved that the testator was an habitual drunkard, that he was "always soaking," "almost always delirious," and had been repeatedly under treatment for delirium tremens. By his will he left the whole of his property to his wife, to whom he had been married a few months, and whom, it was said, he had known only for a month before marriage. The jury found for the will.—Manchester Assizes, March 1st, 1898.—*Manchester Guardian*, March 2nd.

Browning v. Green.

Plaintiff was a nurse, and in that capacity had the care of defendant, a dangerous lunatic. Defendant, in an outbreak of violence, struck the plaintiff a blow in the eye, whereby the sight was permanently destroyed. For the defence the facts were admitted, but it was pleaded that defendant, a lunatic, was not liable for an assault. The jury found for the plaintiff, with £78 damages; and upon an intimation from the judge that he hoped nothing more would be heard of the point of law, the defence was abandoned.—Birmingham Assizes (the Lord Chief Justice), March 24th, 1898.—*Times*, March 25th.

Re Charles Clarke.

This was an important appeal, involving the rights of a judgment creditor as against a receiver subsequently appointed under Section 116 of the Lunacy Act, 1890. The case, however, is of no medical interest.—*Times*, March 8th, 1898.

In re the Earl of Sefton.

This case in the Court of Appeal decided an important point with respect to dealing with the property of a lunatic, but is of no medical interest.—*Times*, June 15th, 1898.

In re Lamond.

An inquiry into the state of mind of Miss Cordelia Warde Lamond. It was proved that the lady had employed eleven detectives and thirteen solicitors in connection with her affairs. She had brought two actions against the Hôtel Métropole, two against Sir George Lewis, one against the Hôtel Cecil, five against officers of the Irish Rifles, and one against a naval officer. Most of these actions were for slander, and all had failed. In her bankruptcy there were thirty claims against her estate—seventeen by solicitors and five by detectives. The jury found that she was incapable of managing her affairs, but capable of managing herself, and was not dangerous to herself or others.—Before Mr. J. Fischer, Q.C.—*Times*, June 22nd, 1898.

Thus by the sapience of a jury a person with delusions of persecution is let loose upon the public.

Harward v. The Guardians of the Hackney Union and Frost.

Plaintiff was taken by Frost, a relieving officer, to the workhouse infirmary as a lunatic. A magistrate who saw him there discharged him as sane. Action for false imprisonment.

The wife of the plaintiff applied to the relieving officer for the removal of her husband as a lunatic, saying that he had threatened to commit suicide and to kill her and his children. Upon this application the defendant Frost directed the removal of plaintiff to the workhouse infirmary, which was accordingly done. Subsequently plaintiff was seen at the infirmary by a justice, who found him sane, and he was discharged. Frost deposed that he honestly believed that it was for the public safety or for the welfare of the plaintiff and others that the plaintiff should be brought to the infirmary and placed under care and control, and that he was actuated by no other motive except that of doing his duty.

The man who removed plaintiff on defendant's instructions was asked by the judge if he saw anything to lead him to think that the plaintiff was a lunatic.

"I cannot say that there was; but I am no judge of that matter. I never thought about it, but simply obeyed my orders."

Dr. J. J. Gordon, one of the medical officers to the infirmary, said that he saw the plaintiff on admission. Plaintiff was then very excited, considered himself persecuted by his wife and some other relatives, and that he was the victim of a conspiracy.

The judge directed the jury that if they thought that Frost had honestly satisfied himself that the plaintiff was a lunatic and should be placed under restraint, then the defendants would be entitled to their verdict. In any case, there was no case against the guardians.

The jury found for the plaintiff, damages £25, on the ground that Frost did not exercise reasonable care to satisfy himself that plaintiff was of unsound mind and dangerous to be at large before arresting him.—Queen's Bench Division (Mr. Justice Hawkins), Jan. 19th and 20th. 1898.—*Times*, Jan. 21st.

On appeal the verdict was set aside, March 22nd.

Reg. v. Irving.

Ellen Irving was indicted under Section 315 of the Lunacy Act, 1890, for taking charge of a lunatic for payment in an unlicensed house. There were other counts in the indictment charging that the person mentioned was an alleged lunatic, "was received to board and lodge," and had been "detained." It appeared that in February, 1897, Miss Irving, who kept a convalescent home at Clacton-on-Sea, received a telegram asking her to receive a lady patient. The following day she received a letter from the patient herself asking for a cheerful room. The patient came alone by train, and at this time there was no suspicion that she was of unsound mind. In about ten days' time, however, she became very troublesome and violent. Her friends were communicated with, and in March the patient was removed. The defendant pleaded guilty, but it appeared that she was ignorant of the provisions of the statute.

For the prosecution it was stated that the Commissioners in Lunacy had no wish to press the matter. Their only object was to make it widely known that the reception of a lunatic under the circumstances was illegal.

The judge emphasised the importance of diffusing this knowledge, at the same time stating that the prosecution did not in the smallest degree reflect upon the defendant, whom he bound over to come up for judgment if called upon.—Chelmsford Assizes (Mr. Justice Hawkins), July 1st, 1898.—*Times*, July 6th.

It is satisfactory to find that even in one case, and that a very unimportant one, the Commissioners have been able to prosecute and to secure a conviction under Section 315 of the Lunacy Act, 1890. It is notorious that this enactment is being