endeavour will be required to insist upon the protection of physicians as well, whether these are employed to sign lunacy certificates, or are the superintendents of hospitals and asylums for the insane. This aspect of the subject was fully debated in the Psychology Section of the meeting of the British Medical Association held at Cardiff in July. A report of the discussion will be found in "Notes and News" of the present number.

Neave v. Hatherley.

"Jesuit-mania" may be added to the long list of varieties of insanity by those who desire to refine upon old-fashioned nomenclatures. Miss Neave laboured under many delusions, one being the belief in the influence of the Jesuits upon the servants and others. The action was brought by her against Mr. Hatherley and Dr. Gardiner, but in consequence of the decease of the latter the action was carried on against the surviving defendant only. Miss Neave might make a virtue of necessity, and proudly say, with Charles V., "I do not wage war against the dead, but the living." Mr. Hatherley pleaded that he had signed the certificate bonâ-fide, and he happily gained the day; in legal phraseology, he was not guilty of culpable negligence in certifying that Miss Anne Alice Neave was insane on the 12th of July, 1881. We are glad to have it said by Lord Coleridge, whose sympathies are not always on the side of mental physicians, that it were "lamentable" if, in such cases as these, medical men were "to be made responsible for honest mistakes, for the consequence must be that those who were in the higher ranks of the profession would refuse to sign certificates in lunacy cases, and alleged lunatics would be at the mercy of men in the lowest ranks of the profession." This is actually coming to pass. Yet there are those in even our own profession who profess to hold that the Lord Chief Justice showed his ignorance in expressing this opinion. A medical journal deems it probable that "nine-tenths of the members of the medical profession, who are in what we presume Lord Coleridge would call its lowest ranks, are more likely to form a safe and clear judgment than those in the higher ranks." Paradox is all very well in its way, but we should have hardly expected that the temptation to write a smart article would have led our contemporary into such a childish ab-

surdity, had we not remembered a certain dissertation some years ago on the resemblance between asylums for the insane and Zoological Gardens. Common-sense is doubtless of the utmost importance in the diagnosis of lunacy as in that of other diseases, and we may assume that it is equally distributed among the different branches of the profession. It is something new to learn that the addition of special experience in a disease unfits a man to form an opinion about it.

To whatever rank, however, the defendant in this case may be relegated—the "higher" or the "lower" in the professional scale—he is to be congratulated on the verdict, and the late Dr. Gardiner also may be congratulated on being at rest where the wicked cease from troubling psychological physicians.

Hillman v. Crosskey.

This trial—another in which a person who had been under certificates took proceedings against a doctor who signed one of the certificates—differs in many very important points from those which have recently been before the public.

The trial was held at Lewes during the Sussex Assizes, and the points at issue had on several occasions been before other tribunals.

It was expected that the trial would have been a very prolonged one, for the first two actions which were down for trial were against the two magistrates who signed the order for the reception of the patient into a county asylum. The order of the magistrates had been quashed, and already one action against them had been tried, and in the High Court the plaintiff (Hillman) lost, there being two judges against three. The question now awaits the final decision of the House of Lords.

By arrangement, the action against the magistrates was postponed till the House of Lords decided on the point of law as to the nature of the "examination" required to be made by the magistrates, and, therefore, the action against Dr. Crosskey alone was tried. As the decision may be appealed against, it will only be necessary to give a succinct account of the trial, not in any way prejudging the questions at issue. The facts brought out at the trial were that Mr. Hillman, an old resident at Lewes, was a man of inde-