

In meningitis complete precipitation occurs in the higher dilutions, tubes 1 and 2 usually remaining negative.

In a miscellaneous group of 183 cases the colloidal gamboge reaction was uniformly negative, and this in spite of the frequent presence of increased globulin and cell content.

In conclusion, we would like to emphasise the value of a routine examination of the spinal fluids of all new admissions. Changes in the cerebro-spinal fluid are among the earliest findings in syphilitic disease of the central nervous system, and their detection affords a basis for treatment which, if promptly applied, may transform a seemingly incurable patient into a useful member of society.

Recent Medico-Legal Cases.

[The Editors request that members will oblige by sending full newspaper reports of all cases of interest as published by the local press at the time of the assizes.]

REPORTED BY DR. M. HAMBLIN SMITH.

GAUL *v.* EARL SPENCER AND OTHERS.

This case, tried before Mr. Justice Darling and a jury on June 22nd and following days, was a civil action for damages for false imprisonment and breach of contract. The case was brought by Miss Lilian J. Gaul against Dr. D. F. Rambaut, Medical Superintendent of St. Andrew's Mental Hospital, Northampton, and the Managing Committee of that institution.

The plaintiff conducted her own case. She entered the hospital as a voluntary boarder on April 26th, 1917. On May 8th a reception order under the Lunacy Act, 1890, was made. Plaintiff asserted that this order was obtained unlawfully. It was urged by the defendants that proceedings were barred by the Public Authorities Protection Act. The judge held that they were so barred, so far as any alleged irregularity in the reception order was concerned, and that the plaintiff's only cause of action was the alleged breach of contract to treat her as a voluntary boarder. This part of the case was then proceeded with.

The plaintiff complained that, on arrival at the hospital, she was deprived of her clothes and kept in bed. She had attempted suicide, on the day previous to her arrival at the hospital, by taking two ounces of laudanum. The medical evidence was that she had never demanded her release while being treated as a voluntary boarder, and that her confinement to bed was simply part of the treatment of the condition arising from her attempt at suicide. The plaintiff tried to argue the

question of the "morality" of suicide, illustrating the matter by the examples of a number of eminent persons who are alleged to have committed suicide. The argument indicated the difficulties which arise as soon as any other view is taken of "morality" than that it is the generally accepted standard of conduct at any given time.

In his summing-up the judge said that the question was one of contract. Had the plaintiff been properly treated? The same rules did not apply to people who were ill as might apply to ordinary people. There was such a thing as wise restraint. If the plaintiff's liberty was only restricted so far as was required by her condition, no offence was committed.

The jury found a verdict for the defendants, and judgment was entered accordingly, with costs.

We sympathize with Dr. Rambaut in the trouble which this case must have caused him. But the officers of mental hospitals can never be wholly free from the risk of worries occasioned by a litigious ex-patient.

REX *v.* ERNEST ALBERT WALKER.

This case, tried at the Central Criminal Court on June 21st before Mr. Justice Roche, raised points of interest as regards crimes committed under the influence of epilepsy.

Walker is 17 years of age, and is described as a footman. He was indicted for the murder, on April 22nd, of a district messenger boy. He was alone in his employer's house, in Lowndes Square, that evening, and about 6 p.m. he telephoned to an office for a messenger. A boy named Davis was sent. About 8.30 p.m. that same evening the prisoner had made his way to Tonbridge, where he informed a police constable that he "thought" he had committed a murder in London, mentioning the time at which, and the weapon with which, he had done it. He also said that he did not know why he had done it. The body of the boy Davis was found in the house. A letter was found, in the prisoner's handwriting, addressed to a fellow-servant, in which he first described what appeared to have been a plan for suicide on some previous occasion, and then went on to an account of the way in which he had killed Davis. And a kind of programme was found, also in the handwriting of the prisoner, which gave, in much detail, the procedure which he intended to adopt as regards the murder, part of which was actually carried out. The details of this programme strongly suggest the scenes shown in a sensational cinema film. There was nothing to show whether these documents were written before or after the commission of the murder.

There was a very strong history of insanity in other members of