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extended to all persons within the territorial jurisdiction of Germany, whether nationals or aliens, neutral or enemy; and that the legislative decree applied not only to the transfer of money from Germany, but from any foreign country as well. The defense contended that German legislation could not prohibit valid legal relations between two foreign countries or the fulfillment of obligations contracted by subjects of foreign states not to be performed in Germany. The court took the view that one element of the offense, the direction to pay, had taken place within the jurisdiction of Germany, and that this sufficed to bring the defendant within the penalty fixed by the decree.

**LIMITATION OF ACTIONS—SET-OFF OF BARRED DEBT BY ADMINISTRATOR AGAINST DISTRIBUTEES.**—The intestate at the time of her death had a claim against her son which was barred by the statute of limitations. One of the distributees brought suit to settle the estate, contending that the debt should be charged against the son's distributive share. *Held*, that the barred debt was not properly the subject of set-off against the son's share of the estate. *Luscher v. Security Trust Co.* (1918, Ky.) 199 S. W. 613.

By this decision Kentucky is added to the growing list of states which refuse to permit the share of a legatee or distributee to be reduced by a statute-barred debt—contrary to the English decisions and those of certain American courts. For a discussion of the subject see (1916) 26 YALE LAW JOURNAL, 236.

**NEGLIGENCE—LIABILITY OF MANUFACTURER TO THIRD PARTIES—FAILURE TO WARN OF DETERIORATION OF PRODUCT.**—The defendant manufactured a food product for infants and invalids which he knew or should have known was likely to deteriorate by time or manner of keeping after leaving his hands. The infant plaintiff's mother purchased a can of the food from a retailer to whom the defendant had sold it. The plaintiff was injured by eating the food, which had deteriorated. *Held*, that the defendant was chargeable with negligence in failing to affix to the package the date of manufacture and the time during which the ingredients might safely be used, or the manner in which they should be handled and preserved to prevent deterioration. *Rosenbusch v. Ambrosia Milk Corporation* (1917, N. Y. App. Div.) 168 N. Y. Supp. 505.

This is an interesting and novel, but it is believed a sound, extension of the principles upon which manufacturers are held liable in tort to remote vendees or consumers of the manufactured product. See (1917) 27 YALE LAW JOURNAL, 281.

**NEGLIGENCE—PROXIMATE CAUSE—VOLUNTARY INTERVENTION OF PLAINTIFF'S INTESTATE.**—The defendant's driver left its horse untied near a railroad platform. The horse wandered on to the platform and fell. The station master, the plaintiff's intestate, helped the horse to its feet and led him off the platform but did not tie him. The horse wandered back upon the platform and again fell. In attempting a second time to raise the horse the station master received injuries which proved fatal. A judgment dismissing the complaint was affirmed by the Appellate Division. *Held*, that the intervention of the deceased did not prevent the defendant's negligence from being the proximate cause of the accident and that the case should have been submitted to the jury. *Chase and Cuddeback, JJ., dissenting. Donnelly v. H. C. & A. I. Piercy Contracting Co.* (1918, N. Y.) 118 N. E. 605.

On the general subject of liability to volunteers, see (1918) 27 YALE LAW JOURNAL, 415.