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Workmen's Compensation Decisions

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the subject matter of a gift, and instructs him to give it to his daughters, there is sufficient manifestation of intention to make a gift *causa mortis*, and delivery is complete.

WORKMEN'S COMPENSATION DECISIONS

An employee, engaged in blasting, was injured while using a fuse extending out of the hole only two inches, which was contrary to statute. Compensation was denied on the theory that the injury was self-inflicted, or through wilful misconduct. In construing the term "wilful" as applied to compensation cases of that character, the Supreme Court of Virginia said: "The term imports something more than mere exercise of the will in doing the act; that is, a wrongful intention, or an intention to do an act that he knows, or ought to know, is wrongful, or forbidden by law. It involves the idea of premeditation and determination to do the act, though known to be forbidden. An employee who is injured in the course of employment is not barred from recovery by the fact that, at the time of the accident, he was engaged in doing an act forbidden and penalized by a general statute of the state, unless the employer can show that he had knowledge of the statute, or that reasonable steps had been taken to bring notice of it to him."—*King v. Empire Collicries Co.*, 139 S. E. 478.

AMERICAN LAW INSTITUTE

Hon. Geo. M. McKenna was delegated to represent North Dakota at the recent meeting of the American Law Institute, and he makes the following comprehensive report:

An exceedingly interesting meeting of delegates and guests interested in the work of the American Law Institute was held in Chicago, October 27, 28 and 29, 1927.

The meetings were presided over by Hon. George W. Wickersham, President of the Institute work, and Dr. William Draper Lewis, Director.

Invitations had been sent out to the various State Bar Associations, members of the Federal Judiciary of the Sixth, Seventh and Eighth Circuits, members of the highest courts, and other Judges in the Northwestern and Central States. The response was very gratifying. The State Bar Association or Supreme Courts of the States of Colorado, Illinois, Indiana, Iowa, Kansas, Kentucky, Maryland, Michigan, Minnesota, Missouri, Nebraska, New York, North Dakota, Ohio, Pennsylvania and Wisconsin were represented.

The object of the meeting was two-fold: First, to analyze and discuss critically the tentative drafts of the re-statements on Conflict of Laws, numbers 1, 2 and 3; Contracts, numbers 1, 2 and 3; and Torts, numbers 1 and 2; secondly, to discuss ways and means by which these tentative drafts might be placed in the hands of the practicing Bar of the country as a whole.

The writer had the honor of being the sole representative of the State of North Dakota present at the meeting. In his opinion, the meeting was more successful and more advantageous than the larger meetings which are held annually at Washington, D. C., for the reason that the group was smaller and the delegates apparently felt more free to voice their criticisms, to ask questions, and to enter into the various discussions.