

846 Longshoremen's and Harbor Workers' Compensation Act--Climbing of Ladder to Leave Hold Following Heart Attack as Cause of Death--Accidental Injury.

Medical evidence supported the commissioner's finding that after suffering a heart attack the deceased climbed a 30-foot perpendicular ladder, the only means of exit from the hold in which he was working, and that this exertion was the cause of his death 15 minutes later. Such an overstraining of the workman's powers, when the required exertion is too great for the man undertaking the work, constitutes an accidental injury; the source of the force producing the injury need not be external. Judgment upholding an award of death benefits was affirmed. Southern Stevedoring Co., Inc. v. Henderson. United States Court of Appeals, Fifth Circuit. No. 12,707. July 14, 1949. --CCB

847 Silicosis--"Gift Payments"--Statute of Limitation--"Ditty Rule"--Computation of Award.

Where an employer is aware that an employee has contracted silicosis, continues to employ him at a reduced wage, and after the employee is unable to work any longer, makes weekly payments which he calls "gifts" until a length of time in excess of the period of the statute of limitations has elapsed, a finding that these "gifts" were in reality compensation payments and as such did not toll the statute will be affirmed if supported by sufficient competent evidence. In computing the award, the employer was allowed a credit for only the compensation payments made (which included the "gift" payments) since the "Ditty Rule" was held inapplicable as the employer reduced the compensation of the employee upon continuing his employment after the discovery that the employee had contracted silicosis. American Radiator & Standard Sanitary Corp. v. Crawford. Kentucky Court of Appeals. June 21, 1949. --CCB

Books, Pamphlets and Notices

848 Bottom-Up Management. People Working Together. W.B. Given, Jr. Harper & Brothers, New York. 171 pp. (1949) Price \$2.50.

The author has previously outlined the principles of "bottom-up management" and briefly described its practice in his company. (See IHF Abstract No. 716, June, 1949). This book deals more extensively with the same subjects. The first section entitled "Freedom within Management", emphasizes sharing responsibility, careful selection of men in authority, knowing people in the organization, open discussion of ideas, and freedom to fail. It is also pointed out that sometimes a top-down push is necessary. The second section, "The Competition of the Possibles", with the foreward from Francis Bacon: "It would be unsound and contradictory to expect that things which have never yet been done, can be done, except by