

mildly, and that the evidence would warrant a stronger finding as to the ability of the defendant as an expert ball player. He has been for several years in the service of the plaintiff club, and has been re-engaged from season to season at a constantly increasing salary. He has become thoroughly familiar with the action and methods of the other players in the club, and his own work is peculiarly meritorious as an integral part of the team work (sic, *which is so essential!*) In addition to these features which render his services of peculiar and special value to the plaintiff, and not easily replaced, Lajoie is well known and has great reputation among the patrons of the sport for ability, and was thus a most attractive drawing card for the public. He may not be the sun in the base-ball firmament, but he is certainly a bright particular star." Surely this is a voice from "the bleachers,"—a voice that is most clamorous when the dog-star rages, and intellectual brilliancy pales its insignificant fires before the dazzling lustre of the "diamond!"

When one's nerves recover from the shock of perusing this naive bit of forensic literature it is well to note that in the *American Base-ball and Athletic Exhibition Co. v. Harper*, the Circuit Court of St. Louis, in May last, refused an application for an injunction in a precisely similar case, and expressly disagreed with the opinion expressed by the Supreme Court of Pennsylvania in the *Lajoie case*. Moreover, it is to be observed that the English courts have very jealously guarded the extension of the doctrine of *Lunley v. Wagner* as to restraining breaches of negative stipulations in contracts for personal services.

A CHAPTER ON "SCISSORS."

When a solicitor is called on to advise a client, as to recovering a claim such as was in question in *McCormick Harvesting Machine Co. v. Warnica*, 3 O.L.R. 427, he will have to say to his client something to the following effect:—"This will prove a very costly affair if you wish to recover the claim by process of law, and will probably in the end involve you in more costs than the whole amount at stake, because, according to the decisions of the High Court of Justice, the claim is not within the jurisdiction of the Division Court and must be sued in the County Court as you may see from