

Excellent Majesty, by and with the advice and consent of the Lords Spiritual and Temporal, and Commons, in this present Parliament assembled, and by the authority of the same, as follows :

1. Upon application made by the governor or person exercising the functions of governor or of any of Her Majesty's colonies or dependencies, and after it has been shown to the satisfaction of Her Majesty's Principal Secretary of State for the Colonies, that the system of jurisprudence, as administered in such colony or dependency, answers to and fulfils the conditions specified in section three of the Colonial Attorneys' Relief Act, and also that the attorneys and solicitors of the superior courts of law or equity in England are admitted as attorneys and solicitors in the superior courts of law and equity of such colony or dependency, on production of their certificates of admission in the English courts, without service in the colony or dependency or examination, except in the laws of the colony or dependency in so far as they differ from the laws of England, Her Majesty may, from time to time, by Order in Council direct the Colonial Attorneys' Relief Act to come into operation as to such colony or dependency, although persons may in certain cases be admitted as attorneys or solicitors in such colony or dependency without possessing all the qualifications for admission or having fulfilled the conditions specified in the said section three, and thereupon, but not otherwise, the provisions of the Colonial Attorneys' Relief Act shall apply to persons duly admitted as attorneys and solicitors in such colony or dependency after service and examination; that is to say, no attorney or solicitor of any such colony or dependency shall be admitted as a solicitor of the Supreme Court in England unless, in addition to the requirements of the Colonial Attorneys' Relief Act, he prove by affidavit that he has served for five years under articles of clerkship to a solicitor or attorney-at-law in such colony or dependency, and passed an examination to test his fitness and capacity, before he was admitted an attorney or solicitor in such colony or dependency, and further that he has since been in actual practice as attorney or solicitor in such colony or dependency for the period of seven years at the least.

2. This Act may be cited as the Colonial Attorneys' Relief Act Amendment Act, 1884.

RINGING OF CHURCH BELLS—WHEN A NUISANCE.

In connection with a question which came before the Recorder's Court at Montreal not long ago, (*ante*, p. 257) it may be well to refer to a case decided last year by the Court of Appeals, St. Louis, Mo.—*Leete et al.*, App. v. *The Pilgrim Congregational Society et al.* The question was when the ringing of church bells will be regarded as a nuisance and restrained by injunction. The opinion of the Court seems to us sound, and may be read with advantage by those who are called upon to decide similar points. Thompson, J., for the Court, said :—

"The question in all cases of this kind is, whether the inconvenience complained of ought in fact to be considered as more than fanciful, more than one of mere delicacy and fastidiousness, as an inconvenience materially interfering with the ordinary physical comfort of human existence, not merely according to elegant or dainty modes or habits of life, but according to plain, sober and simple notions among the people. Applying these principles to the facts of the case, we are clear of doubt that we ought not to enjoin, restrain or in any way interfere with the ringing of these bells for religious worship on Sunday. The quarter-ringing is convenient and pleasurable generally to good people living in the vicinity of the church. This ringing takes place only in the daytime, and mingles with the ordinary sounds of the street. It cannot be greatly disturbing to persons of ordinary habits and temperaments, and an overwhelming preponderance of evidence shows that it is not disturbing to such persons, but pleasurable. The plaintiffs have not produced a single witness, except themselves, who have testified to being seriously annoyed or incommoded by this quarter-ringing in the daytime. We are therefore justified, under the principles already stated, in holding that this ground of their complaint has not been clearly made out, so as to enable them to relief by injunction, until they have established the fact by a verdict and judgment at law, that this particular ringing is a nuisance to them in their dwellings, and accordingly we decline to make any order touching the