attack on the Christian religion is not criminal as blasphemy at common law, thus setting at rest any doubt which may have been felt about the striking summing up of Lord Coleridge, C.J., in *Reg* v. *Ramsay and Foote* (48 L.T. Rep. 733; 15 Cox C.C. 231; Cababé and Ellis, 126).

Lord Coleridge's ruling has held the field for thirty-four years, and was followed by Mr. Justice Phillimore in *Rex* v. *Boulter* (72 J.P. 188). Its accuracy had, however, been disputed by Sir James Fitzjames Stephen, in his writings on Criminal Law, *passim*, and more fully in the article in the *Fortnightly Review* for March 1884. To this article the late Mr. L. M. Aspland, barrister of the Middle Temple and Northern Circuit, replied in a pamphlet, "The Law of Blasphemy: being a Candid Examination of the Views of Mr. Justice Stephen" (Stevens and Haynes, 1884), which contains a full and able review of the authorities, and strongly supports Lord Coleridge's view. It is noteworthy that Mr. Aspland—a member of a well-known Unitarian family—in Appendix II. reprints two letters from Sir Samuel Romilly, written in 1817, which, curiously, contain the germ of the appellants' second contention. Thus, Sir Samuel Romilly wrote (p. 38) that legacies for propagating Unitarian or Jewish religion would not be "established" by the Court of Chancery, and (p. 39) that "there are many acts which are so illegal that courts of justice will give no countenance to them, although they do not amount to indictable offences." These letters were in explanation of his own argument for the relators in *Attorney-General* v. *Pearson* (3 Merivale, 353).

And, in truth, it was round this last point that the discussion in the recent appeal really ranged. The Court of Chancery, in the days of Lord Hardwicke and Lord Eldon, and later, certainly regarded the time-honoured dictum of Lord Hale in *Taylor's case* (Ventris, 293) that "Christianity is parcel of the laws of England," not (as Lord Sumner now regards it) as mere rhetoric, but as a definite rule of law, to be applied as occasion arose. Two comparatively modern decisions caused the principal difficulty to the society's case, and these the Court of Appeal felt bound to overrule: *Briggs* v. *Hartley* (19 L.J. 416, Ch.; 14 Jur. 683) and *Cowan* v. *Milbourn* (16 L.T. Rep. 290; L. Rep. 2 Ex. 230). They demand some examination.