

complied with the statutory requirement as to speed, but Bruce, J., who tried the action, was of opinion, that it was not incumbent on the informant to make any such case, and that it was sufficient to shew that the defendants were disregarding the statute to entitle the plaintiff to an injunction, which was accordingly granted.

**FALSE PRETENCES**—CRIMINAL LAW—EVIDENCE OF SUBSEQUENT FRAUDS—PRISONER'S RIGHT TO GIVE EVIDENCE ON HIS OWN BEHALF—GRAND JURY.

*Queen v. Rhodes* (1899) 1 Q.B. 77, was a case in which the defendant was prosecuted for obtaining eggs by false pretences. At the trial evidence was given to shew that the prisoner had falsely represented, by advertisements in newspapers, that he was carrying on a dairyman's business. Evidence was also admitted to shew that subsequent to obtaining the goods in question, he obtained eggs from other persons by means of similar advertisements. The question as to the admissibility of the latter evidence was reserved for the opinion of the Court for Crown cases reserved (Lord Russell, C.J., and Wills, Wright, Bruce and Darling, JJ.), who held that the evidence was rightly received. The point was also reserved whether a prisoner is—under the recent Criminal Evidence Act, 61 & 62 Vict, ch. 36, which enables an accused person to give evidence on his own behalf—entitled to give evidence on his own behalf before the grand jury, and the Court held that the accused is not so entitled. The English Act differs from the similar Canadian Act (56 Vict, c. 31, D), in that it does not forbid comment by the Court on the failure of a prisoner to offer himself as a witness. Some of the English judges, we see, have taken a curious view of the new Act, and have actually added to the sentence of a prisoner found guilty, because, in their opinion, the prisoner in giving his evidence had committed perjury; this has very justly provoked adverse comment, as inflicting on the convict a punishment for an offence for which he has not been tried.

**LIBEL**—DISPARAGEMENT OF RIVAL TRADERS' GOODS—CAUSE OF ACTION—INJUNCTION—RULE 288—(ONT. RULE 261),

*Hubbock v. Wilkinson* (1899) 1 Q.B. 86, was an action to restrain the defendants from publishing in China and Japan circulars alleged to contain untrue statements as to an alleged comparative test of the plaintiffs' and defendants' goods, and a