

THE SALE OF GOODS ACT, 1893.

The Sale of Goods Act, 1893, is perhaps the most successful of them all—if the true measure of the success of an enactment lies in the fact that it is seldom explained or criticised in reported cases. The fact is, of course, that this particular measure embodies the condensed wisdom of whole generations of English Judges, famous alike for their knowledge of the common law and for their faculty of applying it to individual cases. The Act was drafted by His Honour Judge Chalmers, and the manner in which it took shape is best described in the preface to his work, *The Sale of Goods Act, 1893* (published in 1894). He wrote: "It is difficult to know whether to call this little book a first or a second edition. It is a first edition of the Sale of Goods Act, 1893, but it is a reproduction of my book on the sale of goods, published in 1890, which was in substance a commentary on the Sale of Goods Bill. The clauses of the Bill, with a few verbal alterations, formed the large type propositions of the book. But though the language of the propositions remains the same its effect is now very different. Those propositions have become sections in the Act, and the decided cases are only law in so far as they are correct and logical deductions from the language of the Act." The great beauty of this measure is largely due to the fact that its passage through Parliament was secured by a number of distinguished lawyers, including (in the Upper Chamber) Lords Bramwell, Herschel, Halsbury and Watson, and (in the House of Commons) Sir Charles Russell and Sir Richard Webster.

LORD BROUGHAM AS LAW REFORMER.

Many of the great Victorian Chancellors toiled in the interests of legal reform. In 1828 Lord Brougham—or plain Mr. Brougham as he then was—moved the House of Commons that a commission should issue to enquire into the defects occasioned by time or otherwise in the laws of the realm and into the measures necessary for removing the same. His speech lasted six hours. In the course of it he exhausted a hatful of oranges, the only refreshment then tolerated by the custom of the House! According