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HON. MR. JUSTICE LATCHFORD.

Hon. Francis Robert Latchford, of the Ottawa Bar, takes the seat in the Chancery Division of the High Court of Justice for Ontario vacated by Mr. Justice Mabee, now Chief Commissioner of the Board of Railway Commissioners for Canada. Mr. Latchford held the position of Commissioner of Public Works and subsequently that of Attorney-General in the Ross Government in the Province of Ontario, so that much of his time has of late years been devoted to the field of politics, which is not in all respects desirable as a training ground for a member of the Bench, though it has some advantages even in that regard. It is therefore difficult to form an estimate of what Mr. Latchford's judicial future is likely to be. We congratulate him, however, upon his appointment, and wish him all success in his new and responsible position.

WORKMEN'S LIEN—DEFECTIVE DRAFTING OF STATUTE.

Another noteworthy illustration of the mischievous results which are constantly being produced by the imperfections of the present arrangements for drafting statutes has been furnished by a recent decision of the Manitoba Court of Appeal (a).

The point involved was, whether certain workmen, hired at the rate of so much an hour, were entitled under ss. 3 and 4 of the Builders' and Workmen's Act (Rev. Stat. Man. (1902) c. 14), to a lien on a building which their employer, an independent contractor, was erecting for the owner. It was held that the claimants were not within the purview of that statute, as it was applicable by its express terms only to

(a) *Dunn v. Sedziak* (1908), 7 West. Rep. 563.