deprive her of the right to vindicate herself in the fullest manner from the aspersions which she believes to have been cast upon her." Lord Brampton's judgment indicates a similar idea.

The question has been the subject of some discussion in Ontario. In *Vardon* v. *Vardon*, 6 O.R. at p. 736, Wilson, C.J., though he does not decide the point, indicates his agreement with the earlier English cases referred to in the judgments below in *Neale* v. *Lady Gordon-Lennox*, and in *Hackett* v. *Bible*, 12 P.R. 482, Boyd, C., in Divisional Court, laid down the rule in accordance with those cases.

But in *Watt* v. *Clark*, 12 P.R. 359, the Chancellor, again in Divisional Court, set aside counsel's settlement of a libel action on the application of his client, the defendant, who said that he had forbidden any settlement at all.

It is true that counsel for the defendant, in his reply, contended that the case was unlike any other reported case, but the foundation for this contention is by no means clear from the report, and the judgment is difficult to reconcile with the Chancellor's own earlier remarks in *Hackett* v. *Bible*.

However, in *Benner* v. *Edmonds*, 19 P.R. 9, the question again came squarely before a Divisional Court, this time the Common Pleas Division.

The action was one of slander, and the plaintiff had authorized a settlement upon the term of a withdrawal of all defamatory statements. The court considered that this involved a prohibition against settling on any other terms. Nevertheless, counsel made a settlement, which did not include such a withdrawal, and the Divisional Court, on the plaintiff's application, set aside the settlement.

By no means all the cases seem to have been cited in the argument, and the Court based its decision upon *Stokes* v. *Latham*, 4 T.L.R. 305, the exceptional English case above referred to.

But that case seems hardly a satisfactory foundation for a decision which is contrary to an otherwise uniform line of