

of libel. But now, not only malicious prosecution, but the other actions are taken out. This is a considerable change, the effect of which should be carefully considered.

ACTIONS ON FOREIGN JUDGMENTS.

The law as to foreign judgments has been much before the courts for many years, but, like many other subjects, cannot be said to be settled. Ever-varying facts open the door from time to time to differences of opinion which require judicial settlement.

In another column (p. 714) is the note of a judgment of a single judge in British Columbia (*Wanderers' Hockey Club v. Johnson*) reported in 14 D.L.R. 42. There is also a recent case in England (*Phillips v. Batho*, 135 L.T. Jour. 186) on the same subject. These cases give a text for a reference to the law discussed therein.

The plaintiff in the latter case claimed £7,200 against the defendant, being damages awarded to be paid by the defendant to the plaintiff by a judgment of the Bengal High Court in divorce proceedings in which the plaintiff was petitioner and the defendant co-respondent. The defendant replied that before the date when these proceedings commenced he had left India, and the court pronouncing the judgment had, therefore, no jurisdiction over him, and he was not bound by their judgment. The plaintiff was an Armenian Christian, born in Persia, who for thirty-three years had lived in British India, and who was domiciled there. He was married to his wife in British India. The defendant was a British subject domiciled in England, who resided in India for nineteen years before March 22, 1910, when he left India for England. On April 20, 1910, the plaintiff caused to be issued in the Bengal High Court a divorce petition against his wife, alleging her adultery with the defendant in India in 1909. The defendant was joined as co-respondent, and served with process by registered post in England. He did not appear; the wife defended. At the trial adultery was proved