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A note in the *Law Journal* (London) by Mr. Uttley, refers to a point of interest which was raised at the Manchester Assizes, in what was known as the Moston Murder Case, as to whether the statements of a prisoner to a police constable ought to be put on the depositions. The prisoner was charged with the murder of his landlady, and amongst the witnesses to be called was a police constable, whom, it appeared, the prisoner, when on trial at the Police Court, had sent for, and there told he desired to make a statement. An interview took place in the dock prior to the magistrates taking their seats. Upon this constable being called as a witness at the assizes, the counsel for the defence objected to his evidence, submitting that when a prisoner sends for a constable and makes a statement to him it should be put in the depositions. A magistrate himself cannot take any statement of a prisoner without first administering to him the caution provided for such occasions, and after that, the prisoner having been clearly given to understand that he has nothing to hope from any promise, any statement which he makes is to be taken down in writing, and it then becomes proper evidence. The protection which the law throws over a prisoner would be completely useless if a constable were allowed to go into the dock when a man was on his trial and receive a statement from him. The constable might colour it in any way he liked, and give it in evidence on the trial. The prosecution must show that there was no inducement held out to the prisoner that he should make this statement before it could be produced as evidence. It appeared, however, on further examination in chief, that the police constable had cautioned the prisoner that any statement he made might be given in evidence against him, and no inducement was offered to the prisoner to make the statement. It was written down but not read over to the prisoner. The judge thereupon ruled that the statement was admissible. The prisoner was found guilty, and sentenced to death.

An unusual application for an injunction was made before the Master of the Rolls in Ireland, in *Kelsoe* v. *The Waterford and Limerick Railway Co.* The plaintiff, who was both an ordinary and a preference shareholder, asked for an injunction to restrain payment of a dividend to the preference shareholders until certain necessary repairs in the rolling stock of the company had been effected. He represented that the profits of the company for the last half-year would only suffice to pay a dividend to the preference shareholders, and the ordinary shareholders would get nothing. He contended that the company's capital had deteriorated, inasmuch as they had allowed their rolling stock to be diminished; and it ought to be made up before any dividend was paid, otherwise the payment of a dividend would be a payment out of capital. The injunction was refused, the Master of the Rolls saying that he could not hold, because a number of waggons which happen to be out of repair required to be put into good order and condition, that, therefore, a shareholder was entitled to come into the Court of Chancery and stop a dividend.

The recent example in Ireland, of the increase of a sentence on an appeal by the convict, was a surprise to us in Canada, and it appears that in England serious doubts exist as to its legality. The *Law Journal* (London) says: "The Irish Act of 1857 is substantially the same as the English Act of 1879, with this important exception, that the Irish Act gives, in cases of a civil nature, a right of appeal to either party; and the section to be interpreted applies to these appeals as well as to appeals by convicted persons, although in the latter case only the person against whom the order is made can appeal. The section in question provides that the quarter sessions or recorder may 'confirm, vary, or reverse the order made by the justices.' The words 'confirm or reverse' apply to criminal as well as civil cases; but the question is whether, according to the true meaning of the section, the word 'vary' does not apply to civil cases only, being cases in which either party may appeal. The practice of Courts of Appeal in civil cases is not to vary the judgment given against the appellant so as to