Acts appear to us to be a very useful form of legal literature, and each one that is produced should be cordially welcomed.

IT has always been a surprise to us that the provisions for summary inquiries into fraudulent conveyances, in R. S. O. cap. 49, secs. 10, *et seq.*, should be confined, as they are, to conveyances of land. The class of persons who make conveyances with a view to defrauding and delaying their creditors do not always possess lands, but most of them possess chattels of greater or less value. At all events nothing is commoner than for impecunious people with fraudulent tendencies to execute chattel mortgages to their sisters, their cousins, or their aunts, and leave their creditors out in the cold. At present we take it, these chattel mortgages, however insupportable, can only be upset by means of a Superior Court action, or an interpleader issue. It would certainly be very convenient if in such cases summary applications could be made to the Master in Chambers, or the County Court Judge, as in the case of conveyance of land. We present this suggestion to the Attorney-General as a slight recognition on our part of his recent public services.

IT is a somewhat remarkable fact that a *cause célèbre* on the subject of maintenance and champerty should have come up in our courts, so soon after one on the same subject in the English courts. The case of *Bradlaugh* v. *Newdigate* was much referred to on the argument in the motion to strike out the now famous Rectory case from the list of cases standing for rehearing before the Chancery Divisional Court, which is now awaiting decision. The whole question in dispute is whether the vestry and churchwardens of St. James' Cathedral have such an interest in the subject of the action of *Langtry* v. *Dumoulin* as justifies them from a legal point of view in intervening, and carrying the case to rehearing in Canon Dumoulin's name. It appeared abundantly clear in the evidence that Canon Dumoulin, if left to himself, would not proceed further with the litigation, but that, subordinating his judgment to the wishes of the congregation he unwillingly acquiesced in the latter assuming control over the case and continuing the fight, at their own expense. Counsel for the plaintiffs, indeed, in somewhat forcible language, talked of "ecclesiastical parasites" who sought to derive sustenance by fattening on the rector. Counsel for the defendants on the other hand contended that the congregation had such an interest as prevented their intervention in the suit being classed as maintenance or champerty, because a wealthy rector would be a relief to the pockets of the congregation, and because the church debenture holders would be more secure in their investment. They also contended that Canon Dumoulin, if he succeeded in establishing his right to the fund in dispute, would hold it as a trustee for the congregation. This the plaintiffs strenuously denied, quoting words of Canon Dumoulin to show that such was not a position he himself recognised, inasmuch as he claims the money would be at his own disposal, although he would consider himself morally bound to consult the congregation in the disposal of it. They, also, lay stress on the fact that no such relationship of trustee and *cestui que trust* is set up in the pleading. Counsel for the defendant urged that as a master may maintain a servant's suit, and a rich man a poor man's, so *a fortiori* the vestry and churchwardens may maintain their rector's. On this the Chancellor observed that in the ordinary case of the rich man and the poor man, the poor man was desirous of having his suit maintained, whereas here the poor man appeared to wish nothing of the kind. Perhaps the decision will ulti-