

gent legislation to prevent the signing of death certificates without having exhausted all means of ascertaining that death has actually taken place. This evil has so impressed itself upon the minds of some persons that they make provision in their wills to prevent themselves being buried alive.

It has been asserted by those who have made a study of this subject that the medical profession is inclined to minimize the result of its perfunctory performance of its duties in connection with this matter, but the facts disclosed by recent statistics, and the investigations of scientists, shew that there is need of legislation to enforce a more careful scrutiny. Carelessness in this matter on the part of those responsible is akin to murder.

NO EQUITIES AS BETWEEN ROGUES.

"He who comes into equity must come with clean hands" is a good maxim. Mr. Justice Houghton, sitting in the Appellate Division of the New York Supreme Court in the case of *Fay v. Herbert*, is the author of another equally trenchant maxim, which goes a little further in the same direction. He crystalizes his views on a case recently before him in the words: "Equity does not adjust differences between rogues." He considered that the plaintiffs were not entitled to legal protection in that they were engaged in a business which was a deceiving of the public for the sake of gain. He also laid down the rule that in equity proceedings the complainant is first to be judged, and until he has been found free from taint a Court of equity will not proceed to determine whether or not he has been wronged. These rules are wholesome and calculated to protect the public against itself, for people do certainly love to be humbugged.

The plaintiffs in the above case were husband and wife, giving entertainments through the country under the name of "The Fays." The principal performances consisted of alleged mind-reading and telling of future events, interspersed with sleight-of-hand tricks. The defendants were former employees,