it was not strictly a legal way of necessity, but a way the use of which was essential to the convenient enjoyment of the farm. The evidence in the case was sufficient to show that it had been so demised.

It would appear that the Courts in America are somewhat less liberal in deciding what is necessary for the comfortable enjoyment of premises. In the case of *O'Rorke* v. *Smith*, the Supreme Court of Rhode Island laid down a some what stricter rule. M. C., the owner of a tract of land, conveyed the west portion to D., reserving to himself the use of a well thereupon for the benefit of the remaining part, which he called the homestead estate. M. C. devised to J. in fee the land between the house and the lot sold to D.,; and to S· the house and the rest of the homestead estate. For a considerable period, but not for long enough to gain an easement by prescription, the occupants of the house had crossed the land devised to J. to get to the well. The only other way for the parties residing in the house to go to the well was by going down the street in front of the house and accross D.'s land, but this was longer, and it was not known that D. would consent to it. In trespass *q. c. fr.* by the grantee of J. against S., it was held that the way across J.'s lot could not be claimed as a right of way of strict necessity, and that the right of way could not be implied from the circumstances of the case as one reasonably necessary. Durfee, C. J., in giving judgment, drew a distinction, supported by some English authorities, between continuous easements, such as air, light, &c., and non-continuous easements, such as rights of way ; and decided, with regard to the latter, that the party claiming the easements would be required to show, either that without the use of the way he would be subjected to what, considering the value of the granted estate, would be an excessive expense, or that there was a manifest and designed dependence of the granted estate upon the use of the way for its appropriate enjoyment, or to adduce some other indication equally conclusive. A similiar conclusion was come to by the Court of Appeal at Ontario,* Canada, in the case of *Harris* v. *Smith*, (*ante*,*infra*. 128) where the Court held that a shop and premises demised by a deed *with all the appurtenances* would not give the lessee a right of way over a neighbouring close, although both premises had originally belonged to the same landlord, and although the close had been demised subject to the right of way. The decision was grounded upon the same reasoning, namely, that a right of way is not such a continuous easement as to pass by implication of law with a grant of land ; only a way of necessity will so pass. The American and Canadian Courts thus considered that, in the absence of express words of grant conveying the easement, it is necessary to prove an absolute necessity—*i.e.*, no other mode of access to the object sought to be approached. It may be added that New Jersey, Louisiana, and Illinois are the only States of America which have adopted the English common law rule as to easements in light and air being capable of acquisition by use or prescription : see *Stein* v. *Hauck*, 4 Cent. L. J. 581. The tenant-farmers in Ireland may be thankful that the courts of law and equity at home are more liberal in their views on the doctrine of easements than the courts on the other side of the Atlantic.—*Irish Law Times.*

* This writer has followed the example of an Englishman in speaking of Ontario as if it were a city. They know many things at home, but are lamentably ignorant of geography. We would mention for their information that Ontario is the name of a country about twice as large as the United Kingdom.—Eds. L. J.

HOW TO GET MARRIED.

This is the question which at the present time is agitating the minds of millions of the fairest daughters of our land. Alas ! for these bright maidens, States now-a-days neither give bounties to men who marry young, nor impose heavy penalties upon all celibates, as the Grande Monarque was wont to do in Canada. 1 Parkman's Old Regimé, 225. This is a query apparently scarcely more soluble than the Oriental question in Europe or the Celestial question in America, yet we will endeavour to answer it, and if our efforts throw any single beam of light into minds darkened by the shades of uncertainty or doubt, we will feel that we have not dipped our pen in ink in vain.

Dear readers, do not expect to have in these lines receipts for philtres to bring back to your sides erring lovers, or draw