told of the great value of these notes, which we need scarcely add are not produced without great labour and at much expense. One of our subscribers, very competent to speak of such matters, for example, in a recent letter says: "The English Cases are well worth the price of THE JOURNAL, without speaking of its other commendable features."

WE recently felt it our duty to call attention to a very objectionable collection circular issued by a Division Court bailiff (see *ante* p. 40). The County Judge to whom we sent the document, as there promised, did his duty in promptly calling his officer to account. The latter, with equal promptitude, wrote a letter to the judge, which is now before us, expressing his sorrow for his misconduct, and promising not to offend again. As the learned judge interceded on behalf of his bailiff, and as the latter has amply apologized, we presume the matter may be allowed to drop. The public as well as the profession are indebted to those who take the trouble of exposing games of this kind. We shall, on our part, be glad to give any assistance in that direction.

DOWER IN MORTGAGED ESTATES.

The Chancery Divisional Court has, at its recent sittings in the case of *Gemmill* v. *Nelligan*, adopted the view which we ventured to express concerning *Pratt* v. *Bunnell*, 21 Ont. 1 (see *ante* vol. 27, p. 449), viz., that the actual decision in that case is not in conflict with the previously well-established rule, that a married woman who has barred her dower in a mortgage is entitled to have the value of her dower in the mortgaged estate estimated on the full value of the amount realized by the sale thereof, where the mortgage is to secure a loan to her husband. It is true that in the judgment in *Pratt* v. *Bunnell* the court assumed to lay down a rule of universal application, to the effect that in all cases where a wife joins in a mortgage her dower must, on a sale by the mortgagee, be estimated only in the surplus. But, as we formerly pointed out, the actual question for decision in that case was this: the mortgage having been given for purchase money, to what extent was the wife dowable? And the actual decision was that in such a case she is dowable only in the