

the Northern Circuit, in the class of cases usually called heavy commercial cases. His acuteness in detecting the real points of his case and his energy in enforcing them, with the store of learning which he had accumulated, brought him success. His fame at this period of his career is commemorated in a song which is still sung on the Northern Circuit, in which all the briefs were said to fall into Manisty's red bag. He rapidly, twelve years afterwards, obtained a silk gown in 1857, and although he did not become the leader of the Northern Circuit, except, perhaps, in the sense that he was senior Queen's Counsel, he held his own on circuit and in Westminster Hall in cases requiring careful treatment of knowledge of the law or a knowledge of the place where to find it, which is almost equally good, and the power of putting the point and driving it home on the bench. It has been said that he had no humour; but there is a tale told of the judge that some time ago he consulted an eminent physician on the state of his health. When questioned as to his diet, he replied that he drank a good part of a bottle of port a day. The physician said, "That will not do; we must knock off that." The judge complied for a fortnight, and came back to say that he was no better and rather worse. The physician suggested that perhaps after all the change of habit had done more harm than good and advised him to return to his usual habit. Whereupon the judge said, "That is all very well; but how about the arrears?" The physician shook his head at this judicial devotion to clearing his list, but it is not impossible that the second prescription helped the judge to do what is the duty of every good judge—"keep down the arrears." The *Law Times* on the same subject, in reply to an article in the *Times*, makes a vigorous defence of those who have entered the profession without taking a University course.

REPORTING—THE MAKING OF HEAD-NOTES. — Judge Seymour D. Thompson has uttered a vigorous malediction in the current *Green Bag* against many minor errors and deficiencies in law reporting. We assent to every one of his criticisms. Especially do we join with the writer in his denunciation of the use of "*ubi supra*," etc. It frequently entails considerable turning back. The Latin form is all that saves it from derision. Suppose the judge or reporter should say "up there." But he has not included the greatest and commonest fault, that is, the construction of the syllabus. There are very few reporters who know how to make a head-note. The English head-notes are generally very poor. In this country there are not above six or eight reporters who know how to do it, and at the head of these we have always put Mr. Chaney, of Michigan, and he never can be surpassed. The radical difficulty with most reporters is that they begin to make the syllabus before they have read the opinion through, and so they build up the syllabus as they go along, by the same process as the judge builds up his opinion, giving every step of the legal reasoning, with all the ifs and buts, all the principles and conclusions of law lying in and around about the point to be desired, and then at the conclusion they give, or attempt to give, the facts and state the point. It is not an exaggeration to say that three-quarters of most head-notes may usefully be struck out or skipped in reading. It is also not an exaggeration to say that many head-notes do not give the slightest hint of what