

would turn it over in what he is pleased to call his mind. The answer to the question, "Why old Cranny always sits with the Lord's Justices?" was, "The fact is that Cranny does not like to sit alone in the dark"—not, "I take it to arise from a childish indisposition to be left alone in the dark." The story about the Great Seal is a pointless application of a play upon words exhausted by a witty predecessor of Lord Westbury, when Lord Erskine, commenting on Captain Parry's statement that in the Polar Seas he had lived on seals, said: "Very good living, too, if you keep them long enough." If Lord Campbell had not been Chancellor, Bethell might have said, "I mistook you for the Great Seal." If he said what is put into his mouth, he was not only rude, which is probable, but stupid, which is unlikely.—*Eng. Law Journal*.

THE LATE MR. JUSTICE KEATING.—Sir Henry Singer Keating, who died a short time ago full of years and honours, leaves a name which will, in the history of English law, be associated with the latter days of the Court of Common Pleas. Those days were, perhaps, more brilliant than the last days of all immediately preceding the extinguishment of this great court, although Sir Henry Keating took part in both. When, in 1875, the Court of Common Pleas was merged in the High Court of Justice, to re-issue for a brief period as the Common Pleas Division, Lord Coleridge was Chief Justice, and the justices were, Keating, Brett, Grove, Denman, Archibald and Lindley. When Sir Henry Keating joined the court in December, 1859, Sir William Erle was Chief Justice, and the justices were, Vaughan Williams, Crowder, Willes, Byles and Keating, which last took the place left vacant at the top by Lord Campbell becoming Lord Chancellor, whose successor in the Court of Queen's Bench was Sir Alexander Cockburn, translated from the chiefship of the Common Pleas. A stronger court, perhaps, never sat in Westminster Hall. Every judge of it represented the best traditions of the English bench, and it was specially famed for its knowledge of commercial law. It was a court of men saturated with the learning of the law of England, but a business-like court withal, and not wanting in breadth of view.

If any two contemporaries on the bench of

Common Pleas became more closely associated than the others, they were Keating and Willes. Both were born in Ireland, of English extraction, and educated at Trinity College, Dublin. Keating was ten years older than Willes, but was still a laborious junior on the Oxford Circuit, and attending the Oxford and Gloucester Sessions, when Willes was called to the bar. The first meeting took place on a winter's morning in the Temple Gardens. Keating had risen early for his studies, and, to clear his brain, was taking a brisk walk beside the river, when he met Willes on the same errand. Similarity of tastes led to a close friendship, and a few years afterwards Willes was associated with Keating as editor of "Smith's Leading Cases." In 1849 Keating took silk, leaving Willes to plod on as a stuff gown until he was made a judge in 1855, on the same bench to which Keating was added four years later. Meanwhile Keating diverged into politics. He entered Parliament as the representative of Reading in 1852, supported Lord Palmerston, and was Solicitor-General twice. He did not forget the law, but, as a private member, introduced an Act of Parliament which goes by the name of "Keating's Act." Its object was to provide a summary remedy in actions brought on negotiable instruments, which were too commonly defended merely for the purposes of delay. The principle has since been further applied, and the late judge may be considered as the inventor of that very effective and comprehensive legal weapon which goes by the name of "Order XIV." His own Act has never, we believe, been repealed, but only replaced, and has the solitary distinction of a special rule for that purpose among the rules of court. Since his retirement from active service on the bench, Sir Henry Keating has taken part in the judgments of the Judicial Committee of the Privy Council. He was never so great a lawyer as Mr. Justice Willes, but his judgments were always brief and to the point, and his judicial manner perfect. Unlike his colleague, Mr. Justice Vaughan Williams, he seldom differed from Chief Justice Erle, who, in summing up the qualities of the three judges, who usually sat with him, estimated Willes as a man of profound learning, Vaughan Williams as rather obstinate, and Keating as of singular sense.—*Eng. Law Journal*.