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Of the case of *Cox* v. *Hakes*, which, as already mentioned (13 Leg. News, 345), presented a question similar to that decided in *Mission de la Grande Ligne & Morissette*, M. L. R., 6 Q. B. 130, the *London Law Journal* says:—"The judgments of the House of Lords in *Bell-Cox* v. *Hakes*, 60 Law J. Rep. Q. B. 89, will long be cited as authorities upon the procedure in *habeas corpus* and upon the construction of sections 19 and 47 of the Judicature Act, which give an appeal from the High Court to the Court of Appeal except in criminal cases. The House held unanimously that an order made upon a writ of *habeas corpus* to discharge from custody a prisoner attached under a writ *de contumace capiendo* (the prisoner was a clergyman whose imprisonment had resulted from disobedience to a monition requiring him to abstain from certain illegal practices in matters of ritual) is not a judgment in a criminal cause or matter within section 47 of the Act, whereby no appeal lies from the High Court to the Court of Appeal 'in any criminal cause or matter.' This is quite clear, and appeared so clear to the House that they did not care to have the question argued. Upon the general question whether an appeal lies from a discharge on *habeas corpus* great difference of opinion prevailed; but the majority of the House (five lords out of seven) held that no appeal lay, notwithstanding the very express words of section 19 of the Act of 1873, by which 'the Court of Appeal shall have jurisdiction and power to hear and determine appeals from *any judgment or order save as hereinafter mentioned*, of Her Majesty's High Court of Justice.' 'Probably no more important or serious question,' observed Lord Halsbury in giving judgment, 'has ever come before your lordships' House,' and Lord Bramwell and Lord Herschell delivered separate judgments. The point of authority is now, of course, finally settled."

At Edinburgh it was decided recently by five judges, on an appeal, contrary to the decisions of English judges, that the operation of dishorning cattle was necessary in the interests of the animals themselves, and that, therefore, the perpetrators could not be found guilty of cruelty. Of this judgment the *Law Journal* says:—"The decision of the Scottish Court of Justiciary last week as to the legality of the practice of dishorning cattle is the culminating point in a strange history of judicial conflicts. In the first case on the subject, *Brady* v. *M'Argle*, 14 L. R. (Ir.) 174, the Irish Court of Exchequer in 1884 held that the operation was illegal under the Act for the Prevention of Cruelty to Animals (12 & 13 Vict., c. 92); the judges in this case were Baron Dowse and Justice Andrews. But the very next year, in *Callaghan* v. *The Society for the Prevention of Cruelty to Animals*, 16 L. R. (Ir.) 325, Chief Justice Morris and Justices Harrison and Murphy came to the contrary conclusion, and held that the act is not illegal when performed with due care and skill, and for the purpose of rendering the animals more profitable to farmers in the course of their trade. Following these cases in 1888 came the leading Scotch case of *Renton* v. *Wilson*, 15 Ct. Inst. Ca. 84, in which Lords Young, M'Laren and Rutherford Clark decided that the practice was legal, being customary in certain counties, and justified by a reasonable purpose. Then in 1889, in *Ford* v *Wiley*, 58 Law J. Rep. M. C. 145, Lord Chief Justice Coleridge and Mr. Justice Hawkins discussed the subject with great care, and emphatically dissented, on the evidence before them, from the views expressed by the Scotch and Irish judges. In reliance on this decision the question was again raised in Scotland in *Todrick* v. *Wilson;* and on March 13 last the Lord Justice-Clerk and Lords M'Laren, Trayner, Welwood and Kyllachy pronounced judgment, reviewing all the previous decisions, and unanimously resolving to abide by the view that the operation of dishorning cattle, when performed with skill and in the usual manner, for the purpose and with the effect of preventing the animals from injuring one another, is not an offence under the statute. A curious and perhaps unique feature in this history is that