

created under an Act of Congress in 1887, in view of the contest as to the election of President of the United States. The Commission seated Mr. Hayes, although Mr. Tilden had a majority of more than a quarter of a million of the popular vote. Of course, under our scheme of electing the President the popular vote counted for nothing. The case turned upon certain contests relating to Florida, Louisiana and (we believe) Oregon. It has generally been regarded as a partisan decision, and as evidence of the truth, illustrated by repeated instances, that on party questions judges will generally decide according to their party predilections. Mr. Justice Strong resigned the great office to which he had been appointed, in the year 1880, at the age of seventy-two, and undoubtedly prolonged his life by many years by casting off those onerous labors.—*American Law Review*.

GENERAL NOTES.

THE COMMERCIAL COURT.—The *Times*, in a recent article, points out that the success of the Commercial Court seems assured, for in the very short period in which it has existed—a small fraction of the legal year—399 summonses of various kinds had been heard, and most of them were the equivalents of several summonses in an action travelling by the ordinary judicial high road. Of the 399 applications, 150 resulted in orders to transfer to the commercial list, forty in refusals. The other 209 consisted of applications for directions, &c., in which the judge at an early stage got seisin of the matters in dispute, stated how things were to be put in train for trial, and took care that there was no futile nonsensical skirmishing before the decisive battle was fought. One hundred and thirty-one causes had been appointed for trial, an amount which, in view of the very short time in which the Court has been at work, and the fact that the total number of defended actions, big and little, tried in London and Middlesex by all judges does not much exceed 1,200 to 1,400 a year, is considerable. Ninety-seven causes, some of them of great magnitude and of moment to many others than the plaintiff and defendant, had been tried, and twenty-six had been settled, for the most part through the intervention of the judge. It would be interesting to compare with these figures the entire business of the London Chamber of Arbitration, which was to supersede in commercial cases the ordinary tribunals of the country.