

count that offences were committed "on divers days between the month of January, 1909, and October 4, 1910," and in another count that offences were committed "on divers days between October 4, 1910, and the end of February, 1913." At the trial after the defendant had pleaded not guilty and the jury had been sworn, objection was taken that the indictment was bad for duplicity. The objection was overruled, the trial proceeded and the defendant was convicted. On appeal to the Court of Criminal Appeal (Isaacs, C.J., and Darling, Bray, Lush and Atkin, JJ.) it was held that although the indictment was bad in charging more than one offence in each count, yet as the accused had not in fact been embarrassed or prejudiced in his defence by the form of the indictment there had been "no substantial miscarriage of justice," and the appeal must be dismissed: see the Criminal Appeal Act, 1907, s. 4(1): (R.S.C. c. 146, s. 1019.) The court was of opinion that in strictness the objection to any defect appearing on the face of an indictment should be taken before plea. At the same time the court refused to decide that an objection of that kind might not be taken after plea or verdict.

CRIMINAL LAW—ATTEMPTED SUICIDE—"ATTEMPT TO COMMIT FELONY."

In *The King v. Mann* (1914) 2 K.B. 107, the Court of Criminal Appeal (Lord Reading, C.J., and Bankes and Avory, JJ.) held that an attempt to commit suicide is in law an attempt to commit a felony, and punishable as such.

LANDLORD AND TENANT—COVENANT TO REPAIR—NOTICE OF BREACH—SPECIFICATION OF BREACH OF COVENANT—ADDITION OF GENERAL CLAUSE—SUFFICIENCY OF NOTICE—CONVEYANCING AND LAW OF PROPERTY ACT, 1881 (44-45 VICT. c. 41), s. 14(1)—(LANDLORD AND TENANTS ACT (R.S.O. c. 155), s. 20(2)).

*Jolly v. Brown* (1914) 2 K.B. 103. In this case the plaintiff was lessor of certain premises of which the defendant was the lessee. Certain breaches of covenant had been committed by the lessee, of which the plaintiff had given notice to the defendant under the Conveyancing and Law of Property Act, 1881, s. 14(1), (see *The Landlord and Tenants Act* (R.S.O. c. 155), s. 20(2)), and the question was whether this notice was a sufficient specification of the breaches complained of within the Act. The demised premises consisted of six small houses and the notice stated that the breach complained of was committing or allowing the dilapi-