

larly in favor of one class of judges or another class of judges, or what the amount of increase shall be, are questions which, of course, will have to be dealt with in detail. It is the intention of this Government next session to attempt to deal with the subject in a manner which they hope will be satisfactory to the country; but I must say this, that without some little compromise of views, and some little sacrifice of personal ideas about judges, we should have difficulty in passing the most admirable measure in the world even in this House, where the easiness of the 'circumstances of its members and their independent position renders them more unlikely to criticize a liberal payment to judges than perhaps members might do in another place. Such a measure as the Government, with the most careful consideration of the question, can prepare, they propose to bring down next session."

Several members in the House of Commons have already put themselves on record against any increase. That is to be expected. There are always those who think it desirable to pander to an ignorant and foolish prejudice against lawyers, as a class, and who are unable to see the immense injury done to the public by inferior men being placed in judicial positions. It requires no intelligence to see that this must be the necessary result of not providing adequate remuneration for those who ought to occupy seats on the bench. Those in authority who refuse to see this and act accordingly assume a grave responsibility and do grievous wrong to their constituents and their country.

COMMENTS ON CURRENT ENGLISH DECISIONS.

SOLICITOR—TAXATION OF COSTS—TAXATION AFTER PAYMENT—"SPECIAL CIRCUMSTANCES"—6 & 7 VICT., C. 73, SS. 38, 41. (R.S.O., C. 147, SS. 43, 46).

In re Cheesman (1891), 2 Ch. 289, the Court of Appeal (Lindley, Bowen, and Kay, L.JJ.) declined to interfere with the discretion of Kekewich, J., in granting an order for taxation of a solicitor's bill after payment, under the following circumstances: The solicitor was acting for a mortgagee; the mortgagor had sold the property, and the purchasers were pressing for completion; the solicitor refused to deliver up the deeds unless his costs were paid; the mortgagor objected to the amount, but in order to get the sale completed paid, under protest, the sum the solicitor agreed to accept, and within a month applied for taxation of the bill. Both Lindley and Kay, L.JJ., however, expressed doubts whether they themselves would have granted the order in the first instance, but they considered there were "special circumstances," and it was for the judge of first instance to say whether they were sufficient.

LIBEL—INTERLOCUTORY INJUNCTION.

Salomons v. Knight (1891), 2 Ch. 294, is another case in which an application was made for an interlocutory injunction to restrain the publication of a libel. In this case the defendant had previously published a libel against the plaintiff, for which he had been sued and judgment given against him for £1000 damages, which the plaintiff had been unable to recover. The defendant continued to