

Crompton (1852), Ballantine (1856), and Field (1875) respectively. The dates are those of their being made serjeants. All these gentlemen, except Ballantine, became judges; Lord Field alone survives. On each ring is engraved the motto the serjeant took. Channell's is 'Quid quandoque deceat'; Crompton's 'Quaerere verum'; Ballantine's 'Jacta est alea'; and Field's 'Fais ce que dois, avienne que pourra.'

**A TRUSTEE IN A DIFFICULTY.**—The *London Law Journal* refers to a case before Mr. Justice Williams, which illustrated a case of hardship where no one is to blame. The victim of the law or of circumstances was a trustee under a deed of arrangement, and the Board of Trade was proceeding against him for not rendering an account of his stewardship. The "estate" had realized £3 5s. The disbursements were £3 10s. The Board called for an account; the trustee rendered it, but he neglected to stamp the account, as required by the rules, with a 5s. stamp, and the Board refused to receive it unstamped. "We have no power," said the Board, "to dispense with the stamp. It belongs to the Inland Revenue. We are bound by the Act to exact the 5s." "I have no assets," pleaded the trustee. "I don't like sending a man to prison," said the judge, "unless he is contumacious." Each plea was in its way unanswerable. In the end the trustee was ordered to pay, but the Court intimated that it was not a case for incarceration.

**A QUESTION OF COSTS IN ENGLAND.**—An attempt was made recently in an action for false imprisonment, which had resulted in nominal damages against one defendant and a verdict in favour of the other, to render the plaintiff's solicitor personally liable to the successful defendant for his costs. It failed, however, because, although the plaintiff was undoubtedly without means, the judge was not satisfied that the action as against this defendant was frivolous and vexatious. There are numerous instances of a solicitor having been ordered to pay the costs of the opposite party. Most of them are cases in which the solicitor has brought an action without authority from the client, or has taken proceedings which must clearly be futile, either for an impecunious client or for one out of the jurisdiction, or has guaranteed the client against the costs of the proceedings, and thereby made the action his own. The mere fact that a solicitor