

the Rules of Court, and has no effect upon the operation of the Statute of Limitations. This point, however, is now met in Ontario by The Interpretation Act (7 Edw. 7, c. 2) s. 7, which, in such circumstances, would appear to extend the time for bringing an action until the next day which is not a holiday.

LIBEL—INNUENDO—TRADE PUBLICATION—LIST OF DECREES IN ABSENCE—ERRONEOUS ENTRY—IMPUTATION OF INSOLVENCY.

Stubbs v. Russell (1913) A.C. 386. This was an appeal in a libel action from a Scotch court. The libel in question was published in a weekly paper published by the defendant purporting to give a list of judgments which had been pronounced in the Small Debts Courts against persons in their absence. The list was headed with a statement that in no case did the publication of the decree imply inability to pay on the part of anyone named. The plaintiff was a tradesman, and in the list of judgments one was stated to have been given against him, the fact being that he had paid the debt sued for and the action had been dismissed. The plaintiff averred that the publication falsely and calumniously represented that he was unable to pay his debts, and the court below had directed an issue to be tried. The House of Lords (Lord Haldane, L.C., and Lords Halsbury, Kinnear and Shaw) were of the opinion that the entry, when read in connection with the explanatory note, was incapable of bearing the defamatory meaning alleged, and that therefore there was no question to go to a jury, and the issue ought to have been disallowed.

FRAUD—CONTRACT INDUCED BY MISREPRESENTATION—APPEAL ALLOWED ON FACTS.

Glasgow & S.W. Ry. v. Boyd (1913) A.C. 404 may be here briefly noted as being a case in which the House of Lords reversed the judgment of the Court of Session, in an action to set aside a contract induced by alleged fraudulent misrepresentations, on the facts, their Lordships being of the opinion that the alleged fraud had not been proved.

HEARING IN CAMERA—PUBLICATION OF PROCEEDINGS AFTER TRIAL—CONTEMPT OF COURT—COMMITTAL—APPEAL—CRIMINAL PROCEEDINGS.

Scott v. Scott (1913) A.C. 417. This was an appeal from the decision of the Court of Appeal (1912) p. 241 (noted *ante* p. 66),