

for this, that and the other thing. A physician's little bill for "professional services" has the merit of brevity and comprehensibility, though perhaps it is none the more conducive to any real satisfaction on the part of the recipient, than the more voluminous bill of the solicitor. These qualities of brevity and simplicity, however, which it undoubtedly possesses, are probably considered sufficient to render it unnecessary to require in such cases a month's delivery before suit, and most solicitors would very gladly exchange the detailed system of rendering of bills imposed on them by law for the delightful brevity and simplicity of the physician's method.

Seeing, however, that this exceptional duty of delivering a bill in detail a month before suit, is imposed on solicitors, it seems a little hard to vex them further by holding, as an Irish Court has recently done (see *Maguire v. Carcy*, L. T. Jour., Feb. 1, 1896, p. 316), that where the bill is sent by post, the day of its actual delivery by the post office officials to the person to whom it is directed, is the day of delivery, and not the day on which it is deposited in the post office. If such a ruling were to prevail in Ontario, owing to the very irregular way in which people in country places call for their letters at the post office, it would in many cases be unsafe to resort to the post office as a means for delivering a bill, and nothing but the actual manual delivery of the bill to the client would enable a solicitor to say when he might with safety begin his action for its recovery.

DIVORCE IN BRITISH COLUMBIA.

The jurisdiction of the Supreme Court of British Columbia over the subject of Divorce has again been questioned. The Chief Justice the other day declined to hear and dispose of a motion in the case of *Levey v. Levey*, as he doubted the jurisdiction of the Court in such matters. The motion was afterwards brought before Mr. Justice Drake, who took the view that the Supreme Court had jurisdiction, and acted accordingly.