

man and man.) But let us quote Mr. Dicey for the last time here. "I read the other day in a leading American newspaper a statement to the effect that if the Governments of the United States and Great Britain would only issue a solemn protest against the awful butchery occasioned by the Russo-Japanese conflict in Manchuria, the public opinion of the civilized world would compel the belligerents to lay down their arms. More arrant nonsense was never written, even in the columns of the trans-Atlantic press." Contrasting these expressions with the lofty sentiments of Joseph Cook we ought to consign Mr. Edward Dicey, C.B., to the limbo of the forgotten before we censure our American cousins for not furthering an Anglo-Saxon alliance, or being careless in their speech about it.

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We are not aware that there has as yet been in this country occasion for any discussion as to the forgery of type-writing, but it may arise at any moment. The subject is discussed in a recent number of the *Law Notes*. As said by the writer, it would hardly occur to any one who had not considered the matter that among the advantages of a type-written document over one in manuscript might be numbered the difficulty with which a successful forgery of the former could be accomplished. In fact, most people entertain the contrary view. A critical examination, however, would seem to indicate that every type-writing machine is possessed of a strange individuality; and that type-writing is, of all kinds of writing or printing, the least susceptible of imitation. We have not space to go into the details that lead to this conclusion; those interested in the subject can work it out for themselves. There is one case of an attempt to forge type-writing which has come before the Courts in the United States: *Levy v. Rust*, 49 Atl. Rep. 1017. The defendant was an attorney who was in the habit of having receipts for money paid him made out in type-writing in his office, and then personally affixing his signature thereto. Some of these being produced in Court they were promptly repudiated by him as forgeries. The judge before whom the case was tried carefully examined these documents with an expert, and they came to the conclusion that the receipts never were made in Mr. Rust's office, the mechanical work forbidding such a conclusion. There was also further evidence in that direction owing to the quality of the