

child died? Could he many years after annul the marriage? It is difficult to see why not if he had no means previously of discovering the truth. Could he bastardize his children? It is also difficult to see why not, unless some further refinement be introduced into the law.

My belief is that to assent to the proposition for which the petitioner contends would be to introduce into a law which now is, and beyond question should be, and be believed to be, certain, a new principle not resting on any sound basis, and develop as it must in several directions, sure to give rise to many doubts and much confusion. To show that this apprehension is not visionary, I venture to quote the experience of the American text-writer to whom I have already referred, expressed in the last edition of his work: Bishop, Vol. 1, 452. Speaking of the subject of fraud in relation to marriage, he writes: "Such judicial utterances upon it as we have are largely conflicting, and otherwise muddled. So that, should an author discussing present all those views, and those only, which have occurred to the judges and found embodiment in their utterances, he would lead his readers into a labyrinth of contradictory and chaotic things, out of which the practitioner could not readily discover a path." I hope that I may be pardoned for declining to take a step which, apparently, leads to such consequences. I have to express my acknowledgments to the learned counsel on both sides for the great aid which their researches have afforded to me. I am sorry for the undeserved misfortune of the petitioner, but the petition must be dismissed.

#### RETIREMENT OF THE MASTER OF THE ROLLS.

Lord Esher's long judicial career, says the *London Law Journal*, has at length closed. He will be seen at least no more in that branch of the Court of Appeal over which as Master of the Rolls he has presided with so much vigour and geniality, though we may hope that he will still lend his experience to the Privy Council and the House of Lords. At such an event there will be but one sentiment—that of sincere and widespread regret; for his retirement removes from the Bench a great judge, whose unique personality it will be impossible to replace. These are the days of specialists. We have the company lawyer, the Admiralty lawyer, the commercial lawyer, the bankruptcy lawyer; Lord Esher was all these and more in one. He knew Admiralty law