

under an agreement and had recovered judgment in that action for a part of the sum claimed, which the defendant admitted that she owed. Subsequently the present action was brought in the County Court to recover a further instalment of rent due under the same agreement, and in this action the defendant set up that the agreement was without consideration, and the county judge gave judgment for the defendant; but the Divisional Court (Bray and Bankes, JJ.) held that the defendant was estopped by the recovery in the former action from setting up in this action the plea of want of consideration.

The departure of His Majesty the King for India reminds us that by the Act of Settlement "no person who shall hereafter come to the possession of this Crown shall go out of the dominions of England, Scotland, or Ireland without the consent of Parliament." This article was, however, repealed very soon after the accession of George I. (1 Geo. I. c. 51) as it was held to impose an ungracious restriction on the personal liberty of the Sovereign. On the 10th inst., at a meeting of the Privy Council held by the King for the purpose of making provision for his temporary absence by appointing a commission to act for him in certain matters, including the summoning of a Privy Council should there be urgent need, Prince Arthur of Connaught, the Archbishop of Canterbury, the Lord Chancellor, and Lord Morley were approved by the King as commissioners, and appointed by letters patent under the Great Seal. The constitution of the personnel of the commission was based on ancient and approved precedent. Prince Arthur of Connaught, as a Prince of the Blood and the nearest male relative of the King of full age in the kingdom, was named in a commission which partook of the nature, however remotely, of a regency in accordance with well-established usage; the Archbishop of Canterbury and the Lord Chancellor were named therein as the holders of the highest offices in Church and State, the inclusion of the Archbishop of Canterbury reminding us of the time when Churchmen were likewise, in temporal matters, Ministers of the Crown till the Reformation period; while Viscount Morley found a place on the commission as Lord President of the Council—an officer of the highest dignity, who ranks next after the Chancellor and the Lord High Treasurer, whose office has long been in commission, and now by custom, the commencement of which is uncertain, takes the first place at the council table on the King's right hand.