

without being limited by reference to the preceding words, and that no limit was placed on the discretion of the Court. This is in effect saying that the majority thought the *ejusdem generis* rule did apply, and that the dissentient Judge thought it did not. But the expression *ejusdem generis* does not occur in the reported judgments, and all express mention of the doctrine seems to have been carefully avoided. Lord Justice Bankes said there was "an insuperable difficulty in defining the limitation to be placed on these general words," thus almost echoing in substance the observation of Lord Loreburn in *Larsen v. Sylvester* (*sup.*) as to the impossibility of laying down exhaustive rules for the application of the *ejusdem generis* doctrine.

The Increase of Rent, etc., Act 1915 has now been amended by the Increase of Rent, etc. (Amendment), Act 1919 (assented to on the 23rd Dec. last), and sec. 1 (3) is replaced by other provisions leaving no discretion to the Court on "other grounds," but this does not, of course, affect the value of the judgments in *Stovin v. Fairbrass* for the present purpose. These judgments justify the statement that the *ejusdem generis* doctrine as an actual rule of construction is of much diminished importance at the present day. It might, in fact well be allowed to fall into disuse as a separate rule, being merely an illustration of the maxims *Verba generalia restringuntur*, etc., and *Noscitur a sociis*, already quoted. As *Stovin v. Fairbrass* shews, the doctrine itself is not abrogated and can be applied without being referred to as a substantive rule. In *Larsen v. Sylvester* (*sup.*) Lord Robertson observes that "both in law and also as matter of literary criticism it is perfectly sound."

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THE FREEDOM OF THE SEAS.

M. Clemenceau, in his recent speech in the French Chamber of Deputies in explanation of the Treaty of Peace, in a singularly noble passage said: "As regards the freedom of the seas, England had no need to demand it of anyone. She already had it, and there was no one to dispute it with her." M. Clemenceau, albeit unconsciously, echoed a celebrated declaration of Queen Elizabeth nearly three centuries and a half ago. When Mendoza, the envoy