

the sittings of the court interfered with has been made and served, and that the existence of an alternative remedy by information or indictment for nuisance on the contempt is no answer to proceedings for summary committal, and they added that if law courts in a particular place interfere with neighbouring businesses, that is the fault of the authority which constructed them, and not of the judges (13 Victoria L. R. 539-547). This decision, the *Law Journal* says, is thoroughly in accord with the law of England, and a similar case arose recently at the Old Bailey. The Common Serjeant and his grand jury were disturbed by workmen hammering girders in some new buildings near the Court. He threatened to commit the foreman of the works unless the noise were stopped ; but stayed his hand on finding that the operation in progress was critical and must be finished. Thus he may be said to have suggested a new qualification to contempt of Court—viz. that a noise made in completing works necessary for the safety of the public or the workmen engaged, even if it disturbs a court and is done in disobedience to an order of the Court, is not punishable as being done under inevitable necessity. Oswald on Contempts, p. 27, lays down the principle that it is a grave contempt of court to persist in causing any noise, even outside the precincts of the court, which interrupts its proceedings.

---

Mr. Justice Cave, of the English bench, expressed himself somewhat strongly, on a recent occasion, with regard to the efforts of policemen to extract confessions from persons accused of crime. His Lordship said: "It is the duty of police constables not to get evidence by cross-examining a prisoner and asking questions, but to depose to the facts. I have a great distrust of these things, and the system is carried on in this country to a very wrong extent. It is monstrous the way in which the police constables in this country try to extract confessions out of prisoners." On the other side of the English channel