

might appear tight when the animal was standing, it was not at all tight when the horse was in motion.

Dr. W. B. McGoun, who had had a large experience with valuable horses, approved of the overdraw check-rein; in fact, he had had some horses which he could not control without it. When driving a horse he almost always used the overdraw check-rein.

Mr. James C. King had many times seen the horse in question when it had the overdraw check-rein on, and he had never seen it suffering pain.

Mr. J. Barsalou, whose experience with horses was a large one, approved of the use of the overdraw check-rein, which kept a horse in better style, and an animal did not suffer from it.

Dr. Bruneau deposed that the check-rein was less brutal than the bit, and its use was sometimes necessary. With the horse in question the use of the check-rein, so long as the strap was loose, would not be cruel, as the animal was one which naturally carried its head high.

Other evidence of a minor character having been given, the case was closed.

On the 14th instant the Recorder dismissed the case. He said that it had been proved the check was necessary to manage the horse, and that moreover it was quite lawful to use a check to render an animal handsomer and thus give more value to the property of the owner. Mr. Lowry being a sportsman, added the Recorder, has an interest that his horse should show well, and thus being a better price. No doubt the check causes a certain amount of annoyance until the horse gets accustomed to it, but the annoyance is not caused unnecessarily, and the section of the Criminal code upon which this action is brought does not apply to the case in any way.

---

### *THE LATE LORD HANNEN.*

After a long and painful illness, borne with the fortitude which distinguished him throughout his life, Lord Hannen passed away at his residence at Lancaster Gate on the afternoon of the 26th ult. His health had been in an unsatisfactory condition for many years. While he was president of the Probate, Divorce, and Admiralty Division, he suffered from a painful malady,