

ment, styles a taxation "as between solicitor and client" as including both taxations between the solicitor and his client and a taxation of solicitor and client costs between party and party. Such a classification, however, seems unnecessarily confusing. The three methods of taxation are more properly classified as Boyd, C., points out, in *Heaslip v. Heaslip*, as follows:—

- (a) Taxations "between solicitor and client."
- (b) Taxations "as between solicitor and client."
- (c) Taxations "between party and party."

Both (b) and (c) are taxations between party and party but, under (b), the party taxing is entitled not merely to the usual costs taxable between party and party but also to certain of the other costs which are taxable between the solicitor and his client—but as the case of *Randall v. Giles* shews, such a taxation is stricter than it would be "between solicitor and client," and as a matter of common experience very little more is taxable than on an ordinary taxation between party and party; where, however, costs as between party and party are ordered to be taxed "between solicitor and client" no greater costs can be taxed than if the taxation were ordered "as between solicitor and client:" see *Heaslip v. Heaslip*, 14 P.R. 165.

Lord Justice Buckley regretted that the practice had arisen of differentiating between a taxation "between solicitor and client" and "as between solicitor and client," but considered the practice to be too firmly established to be now altered.

JUDGMENTS, AS AFFECTED BY THE STATUTE OF LIMITATIONS.

Two cases have recently been before the Courts respecting the operation of the Statute of Limitations as regards judgments. In *Poucher v. Wilkins*, 7 O.W.N. 670, the first Appellate Division determined that where a writ of execution has been kept alive by renewals, the execution may be enforced, or the writ may be continued to be renewed, even after the lapse of twenty years from the date of the judgment. The renewal