

Dividends.

Re Edouard Caron, Rivière du Loup.—Dividend, payable June 1, A. Lauranger, Louiseville, curator.

Re Hilaire Chevalier, farmer, parish of Ste. Elisabeth.—First and final dividend, payable May 21, F. X. O. Lacasse, Ste. Elizabeth, curator.

Re Francis Giroux, Montreal.—Special dividend, payable May 28, Kent & Turcotte, Montreal, joint curator.

Re Alfred Trottier.—First and final dividend, payable May 22, A. Quessel, Arthabaskaville, curator.

Separation as to property.

Marie Louise Bégin vs. Louis Gaudiose Leclerc, leather merchant, Montreal, April 29.

GENERAL NOTES.

DECREASE OF CRIME.—In charging the grand jury at Warwick Lord Coleridge stated that his experience showed him that, with a largely increasing population, there was a largely decreasing number of criminals. Whether this was to be attributed to the spread of education, to the better system of police, or to other causes, he did not know, but it was a matter for great congratulation. There is no doubt of the fact of the diminution of crime, in the country districts at least. The very light calendars at most of the smaller assize towns afford ample evidence of this. As to the causes there may possibly be different opinions, but probably the progress of the temperance movement has had much to do with bringing about this desirable result.—*Law Journal.*

SHIPBROKERS' COMMISSIONS.—A point of some importance to shipowners and brokers came before Mr. Justice Kekewich last week in the case of *Williamson v. Hine Brothers* (Notes of cases, p. 160). The question there raised was whether the managing owners of a ship, who were also shipbrokers, and were in receipt of a fixed sum as remuneration for their services as managing owners, were entitled to retain for their own benefit, independently of that fixed remuneration, commission or brokerage for procuring charters and freights. The learned judge considered that the managing owners had no such right, the procuring of charters and freights being part of the duties of managing owners. It was not disputed that managing owners were entitled to employ brokers, and if brokers were so employed they could be paid by the managing owners out of moneys in their hands. But as his Lordship pointed out, where the managing owners were themselves also ship brokers—as is frequently the case—if they chose to employ themselves they could not make any secret profit or commission out of such employment. This, of course, proceeds upon the well established doctrine that an agent is not permitted to make any secret profit out of the conduct of his agency. For all profits acquired whether directly or indirectly, by an agent in the course of, or in connection with, his employment, without the sanction of his principal, belong absolutely to his principal. It was argued that brokers must necessarily be employed; but the evidence went to show that managing owners, who were also ship brokers, did generally, if not always, procure

charters and freights either from their own houses or from outside brokers.—*Id.*

ENGLISH STATUTES OF 1890.—The *Law Students' Journal* directs attention to some features of the annual legislation by the following rhymes;—

'Company's Act.

'A brewery company thought
They'd save money by laying down port,
One can't understand 'em,
But their memorandum
Has been altered by leave of the Court.'

'Directors' Liability.

'A director, who's credulous very,
Believed toast-and-water was sherry;
But they made him say why
He believed such a lie,
A surprise after Peek versus Derry.'

'Judicature Act.

'There was an old judge of appeal,
Who said he could stand a good deal,
But with oceans and oceans
Of new trial motions,
He'd never have time for a meal.'

'Intestates' Estates.

'There was a poor widow called Honey,
Who murdered her son for his money,
But her son, as she found
Left but five hundred pound,
And that went to his widow. How funny!'

A tenant of Lord Halkeston, a judge of the Scotch Court of Session, once waited on him with a woeful countenance, and said; 'My Lord, I am come to inform your Lordship of a sad misfortune. My cow has gored one of your Lordship's cows, and I fear it cannot live.' 'Well, then, of course, you must pay for it.' 'Indeed, my lord, it was not my fault, and you know I am but a very poor man.' 'I can't help that. The law says you must pay for it. I am not to lose my cow, am I?' 'Well, my lord, if it must be so, I cannot say more. But I forgot what I was saying. It was my mistake entirely. I should have said that it was your lordship's cow that gored mine.' 'Oh, is it that? That's quite a different affair. Go along, and don't trouble me just now. I am very busy. Be off, I say!'

Judge Willis about 1780 sentenced a boy at Lancaster to be hanged, with the hope of reforming him by frightening him, and he ordered him for execution next morning. The judge awoke in the middle of the night, and was so affected by the notion that he might himself die in the course of the night, and the boy be hanged though he did not mean that he should suffer, that he got out of his bed and went to the lodgings of the high sheriff, and left a reprieve for the boy, or what was to be considered equivalent to it, and then, returning to his bed, spent the rest of the night very comfortably.

Sir George Rose had a friend who had been appointed to a judgeship in one of the colonies, and who, long afterwards, was describing the agonies he endured in the sea passage when he first went out. Sir George listened with great commiseration to the recital of these woes, and said, 'It's a great mercy you did not throw up your appointment.'