defendant deposed that he had never in fact pledged his credit to the plaintiff; and there being no evidence to the contrary, that was admitted. The defendant's wife deposed that the debt in question was hers, that she had reduced it from its original amount by a payment of 5*l.*, and had promised and intended to pay the whole amount, but had not yet been able to do so, her income being insufficient. Counsel for the defendant cited the cases of *Jolly* v. *Rees*, 33 Law J. Rep. C. P. 177, and *Debenham* v. *Mellon*, 50 Law J. Rep. Q. B. 155 (in the House of Lords), and submitted that the latter was exactly in point. Counsel for the plaintiff contended that, according to the case of *Debenham* v. *Mellon*, a husband was not liable for necessaries supplied to his wife when she had sufficient means, but that he was so liable if she had not sufficient means, and that, in the present case, the shampooing was a necessary, and the lady's means insufficient; or, at all events, that these were proper questions for the jury.—His Honour said he was disposed to enter a nonsuit, as there was no evidence of the necessity of of the shampooing in the first instance, or, at all events, of its continuance for two years. He also thought that, out of the lady's income of 400*l.* for two years, she had clearly sufficient means to have paid the plaintiff's bill of 35*l.*, or, at all events, that there was no evidence to the contrary. At the request of counsel, however, and in order that the case might go in a complete state before the High Court, he left four questions to the jury, to which they replied as follows: 1. Did the defendant pledge his credit?—No. 2. Did the plaintiff give credit to the defendant's wife in the respect of her separate income?—No. 3. Was the rubbing or shampooing a necessary?—Yes. 4. Had the defendant's wife sufficient means to pay for the same?—No. And his Honour entered a verdict for the plaintiff accordingly, the defendant giving notice of appeal.

SERGEANT BALLANTINE.

Sergeant Ballantine belonged to an era in the history of the bar which has not only passed away, but which has been succeeded by another which has passed away. Of his own contemporaries, Serjeant Parry is dead, Mr. Justice Hawkins and Baron Huddleston are on the bench, and Lord Halsbury is on the woolsack. Of their successors by rather a long interval (for Serjeant Ballantine was old enough to have been the pupil of Barons Platt and Watson), Mr. Douglas Straight 'shot madly from his sphere' to a seat on the bench at Allahabad, and Mr. Montagu Williams finds himself quietly ensconced in the magistrate's chair at Woolwich. Serjeant Ballantine, with his contemporaries already mentioned, was among those who soon advanced beyond the practice of the criminal law and entered upon more remunerative business, but while at the Old Bailey and the Sessions House, they played all the forensic parts of the Criminal Courts. Their best *rôle* was that of defenders of prisoners, but they were equally at home in prosecuting them. Their representatives of to-day are perhaps too apt to become specialists, even in a special branch of practice. They are divided into prosecuting counsel and defending counsel, and the result is a deterioration of both. The result is due to a large extent to the monopoly which the Treasury has obtained of all prosecutions of a serious kind. The criminal classes are, for example, hardly likely to choose Mr. Poland, whom they see daily making gaps in their ranks under the inspiration of a Treasury brief, to defend them if they should find him not engaged on the other side. The practice of always prosecuting and never defending, and *vice versâ*, has a tendency to embitter the proceedings, and a change from the one to the other is healthy for the individual and is in accordance with forensic habits and the genius of the law. The institution of a Public Prosecutor of late years has, perhaps, necessarily given rise to a class of counsel like the substitutes of *Procureurs-Généraux* abroad. No complaint is to be made of them, but the institution has a tendency to narrowness. The best corrective is to let it be understood that young counsel must win their spurs by defending well, and for the Treasury to give its retainers to the rising defenders of prisoners somewhat on the principle that an old poacher makes the best game-keeper.