

tradition that the latter give proportionately more in charity and do more for nothing than any other body of men, ministers included.

LAW CLERK OF THE HOUSE OF COMMONS.

The position of Law Clerk of the House of Commons, vacant by the death of Mr. F. A. McCord, has been filled by the appointment of the Assistant Law Clerk, Mr. A. H. O'Brien. The new Law Clerk is a B.A. of Toronto University and an M.A. of the University of Trinity College. He was called to the Bar in 1890, and practised in Toronto until 1896, when he was appointed Assistant Law Clerk at Ottawa. Mr. O'Brien was, for many years, one of the editors of this journal, and is the author of several well-known legal works, among them being "O'Brien's Conveyancer," which is now the recognized work on conveyancing precedents for the English-speaking provinces of Canada.

The Law Clerk of the House of Commons being Parliamentary counsel to the Government as well as solicitor to the House, the position is one of importance. In making the above appointment the Government is entitled to the credit of having carried out the very proper rule—although not always followed—of promoting an official who has shewn himself competent.

BILLS AND NOTES—HOLDER IN DUE COURSE.

A fine point on the subject of negotiable instruments has recently arisen both in England and the United States. It is discussed by our contemporary, *Case and Comment*, as follows:

A recent Iowa case, and two recent English decisions, have reached different results on a question of no small importance under the uniform negotiable instruments law. The decision of the Iowa court in *Vander Ploeg v. Van Znuuk*, (Iowa) 13 L.R.A. (N.S.) 490, 112 N.W. 307, holds that an innocent payee who takes a promissory note in which a blank has been wrongfully