Lords in the recent case of *Foakes* v. *Beer*, 9 App. Ca. 605, 51 L. T. N. S. 833; and a binding agreement, for the payment of part of a debt in satisfaction of the whole, may now be made without its additional "canary bird, or tomtit, or other rubbish," as Sir George Jessel scornfully termed those "valuable considerations," which *Foakes* v. *Beer* solemnly determined were necessary to be given in order to make such a bargain good in law.

Then sections 33, 34 and 43 of the Judicature Act, 1881, are restricted to actions only. After this, the subject of indemnity to defendants in replevin actions is taken up, with a view to altering the law as recently laid down in *Williams* v. *Crow*, 10 App. R. 301, so far as actions of replevin are concerned, which do not arise out of distress for rent, or damage-feasant. Then, for a little diversion, the Queen's Printers' copies of statutes and orders in Council, both Provincial and Dominion, are made *prima facie* evidence.

The High Court is then invested with power to appoint administrators, or administrators *ad litem* with, or without security. This is an extension of the jurisdiction of the High Court. Formerly, it had no power to appoint a personal representative; but it had power to appoint a person to represent the personal estate of a deceased, where no personal representative had been appointed. Persons thus empowered to represent an estate, were often erroneously designated administrators *ad litem*, which of course they were not, as the Surrogate Court alone had jurisdiction to appoint administrators. The Act then goes on to enable the Court to grant a judgment for the general administration of an estate as against an executor *de son tort*, without joining a duly-appointed executor, or administrator.

The jurisdiction of the Master in Chambers is extended to all acts now done by a Judge in Chambers, except the matters excepted by Rules S. C. 420 *a*, 424. The effect of this piece of legislation appears to be to take away from the learned Master in Chambers, the power to make orders for the payment of money out of Court which, under the recent Rule S. C. 548, had been conferred on him—the reason of which is to be found in the fact that, by a subsequent section of the same Act, each County Judge and Local Master is authorized in his respective County to exercise the same jurisdiction as the Master in Chambers, and we suppose that the allowing orders for payment of money out of Court to be made by all these officers, although it might lead to a decentralization of the moneys in Court, was thought not to be of so great a public convenience, as the possible inconveniences which might result from that course.

The result of giving the various local officers these enlarged powers we predict will lead to a great diversity of practice—possibly a different one for each county—together with increased work for the judges in the way of appeals. The various innocents who passed this measure are, no doubt, of opinion they are making law cheaper. Doubtless, they are right too. It will prove cheap, but accompanied with many inconveniences which will in the end, we fear, prove excessively expensive. Formerly, you could go to Osgoode Hall and find the whole record of an equity suit, the decree and the various orders made in it. Now, unless one knows which of the forty offices an action is commenced in, one is pretty well in the position of "searching for a needle in a bundle of hay." In searching titles and other proceedings involving the necessity of examining the papers in any suit, this decentralization which is all the rage, will prove an endless nuisance and a costly luxury. We fear that too many of the lawyers in the House are actuated by Sir