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The abuse of injunctions is undoubtedly more common in some of the states of the neighbouring republic than with us; yet the cases in which this proceeding has been resorted to for illegitimate reasons are far from rare, even here. The *Chicago Legal News* observes:— "There is no power possessed by the Courts that is so often and seriously abused as the power to issue injunctions. The issuing of an injunction may ruin the prosperous business of an individual or corporation, and yet there are judges who order them issued without careful examination and without notice to the opposite party. There ought to be something more than the affidavit of the complainant that his rights will be unduly prejudiced if notice is given to the respondents before the injunction is issued. Some judges will simply glance over a bill that has never been even before a master, see that the usual affidavit is attached, and sign the order for an injunction, which will tie up the business of the defendant, with the remark, "well, if there is anything wrong in this, a motion can be made to dissolve the injunction." The wrong is in granting an injunction in such a manner. A judge should never grant an injunction, unless, upon the exercise of a reasonable intelligence, it appears to him that a proper case is presented. Five minutes' examination of the complainant would often show that he had no cause for an injunction. An injunction is, so to speak, an aggressive writ. It takes hold of the property or thing and keeps it where it is, pending a hearing on the merits, and ought therefore not to be granted where doubtful questions of the law are involved. The ends of justice would be served by the exercise of greater care in the granting of injunctions."

Mr. F. Solly-Flood, Q. C., late Attorney-General at Gibraltar, has published a pamphlet to show that the long-accepted story of Prince Henry of Monmouth, and Chief Justice Gascoign, is a fable. The strongest point made by Mr. Solly-Flood is,that at the date of the story a summary committal for contempt, without trial by jury, was recognized to be contrary to law. The author gives a case of an actual contempt of Court committed by Prince Edward, son of Edward I. This is recited in a conviction of one De Breosa for a similar offence, when it is stated in the roll, "Idem Dominus Rex filium suum primogenitum et carissimum Edwardum Principem Walliæ pro eo quod quædam verba grossa et acerba cuidam ministro suo dixerat et hospicio suo fere per dimidium annum amovit nec ipsum filium suum in conspectu suo venire permisit quousque prædicto ministro pro transgressione satisfecerát."

The common version of the story referred to above reads, that one of the dissolute companions of the Prince of Wales (afterwards Henry V., A. D. 1413), having been indicted before C. J. Gascoign, the young prince was not ashamed to appear at the bar with the criminal, in order to give him countenance and protection. Finding that his presence had not the desired effect, he proceeded to insult the Chief Justice openly. Gascoign thereupon committed the Prince to prison, and Henry submitted to the order. The King, on being informed of what had taken place, remarked that both the firmness of the Chief Justice and the submission of the Prince were grounds of congratulation. It may be observed that under our Code of Procedure (Art. 7) there could be no doubt as to the power of the Court to commit, for it is enacted that "any person who, during the sitting of a Court or of a Judge, disturbs order, utters signs of approbation or disapprobation, etc., may be condemned at once to a fine or imprisonment, or both, according to the discretion of the Court or Judge." "Utters signs" is a curious expression, but the meaning is tolerably clear.

An instance of a retiring ministry exercising their appointing power after resignation occurred during the present summer. Mr. Hugh Cowie, Q. C., died after the resignation of the Gladstone Ministry, but before