occupancy of the judicial seat was only for a short period it became evident that a life of judicial usefulness was before him had he thought fit to retain the position; but, preferring a more stirring life, he returned to the Bar in April last, and his services were then secured by the Canadian Northern Railway to act with Mr. Lash as counsel for that company. His well-known business ability and pleasant personality, as well as his legal attainments, will doubtless be of great service to the enterprising men at the head of that great third transcontinental line.

This retirement has been followed by that of Chief Justice Dubuc, of whom also there is nothing but what is complimentary to be recorded. A courteous gentleman—an impartial judge, always desiring to be absolutely fair—a sound lawyer, specially strong on facts, and whose judgments were seldom reversed on appeal—he retired after a judicial service of thirty years, beloved by the Bar and respected by the people. He was born in the Province of Quebec in 1840, where he became versed in civil law, a helpful addition, by the way, to common law learning. He removed to Winnipeg in 1871, and eight years later became a puisne judge of the Queen's Bench. On the promotion of Mr. Justice Killam, he was made Chief Justice of Manitoba. We trust he may have many years to enjoy his well-earned rest.

ABSOLUTE IMMUNITY IN DEFAMATION.

JUDICIAL PROCEDURE.

A writer in the *Columbia Law Review* is giving a series of articles on the subject of absolute immunity in defamation. The particular matter to which he directs attention in the last issue of that journal speaks of the loctrine in reference to judicial proceedings. We now reproduce it, not, however, giving the large number of citations and lengthy notes, which can, however, be seen by reference to the original article. The general propositions as laid down by the learned writer are as follows:—

Some restrictions upon the application of the doctrine of absolute immunity have been advanced. It has been asserted that