

pair," say the Hebrews; but the Western Court, in *Sharp v. Sharp*, *supra*, belonged to a different school of philosophers, and held that to live in the same house with a wife for ten years and not to address her "either in anger or in kindness" "ill accords with the duty of a husband to his wife." "It is difficult to imagine anything more disagreeable and exasperating than the presence of one who from mere sullenness will not utter a word. The veriest solitude, where no living creature is visible, would be preferable." Out West, taciturnity appears to be a ground for divorce.

In New Jersey, if a man talks too much and steals the engagement ring from his wife, she may get a divorce. The period of conjugal felicity which McKean and his wife—according to the judgment of Bird, V. C.—enjoyed, was measured by a few months. Then came separations and wanderings, charges and recriminations. "But," says the judge, "after her return to her parents, he (McKean) called upon her and had a private interview with her. During this interview he asked for her engagement ring, and promised her upon his honor to return it to her. He did not return it. He left her then and took the ring with him. He says that he told her she could have it again if she would live with him. She says that he took and kept it without any qualification whatever. In my judgment, this act of the husband in taking this ring and carrying it away, without any subsequent efforts at reconciliation, is most ample proof of a determination to separate himself from his wife and to desert her, unless it is made to appear that she was first in fault, and had taken some step to sever the marital relation. I find no such fault in her conduct, although not in all respects of the highest rectitude. Why did the husband want a private interview? He asked her father for such an interview. I conclude it was for the sole purpose of securing the engagement ring, and of thus proving to her the entire absence of all affection or regard." The wife got a divorce, notwithstanding his assertion that he loved her, and was willing and anxious to live with her as his wife. Alack, alack, well-a-day! the difficulties that now beset a poor man's path! A private in-

terview with a man's own wife, with her own father's consent, may now be brought up in judgment against him. Formerly the danger lay in private interviews with other men's wives. (*McKean v. McKean*, New Jersey Ct. of Chy., 34 Albany L. J. 242.)

We understand, from what others have told us, that one of the most difficult things a young lady ever has to decide is what to do with the rings, photos, books, &c., which her Romeo has given her during the happy engagement days, when the love of Romeo has grown cold and the engagement is broken off. To return or not to return? That is the question. With regard to some gifts, such as candies, ice cream, sweets, and kisses, no such troublesome query occurs; they have all melted away. Miss Kraxberger has settled, for the benefit of her unmarried sisters, that the engagement ring may be returned to him who has broken his plighted troth, while at the same time she may make him pay heavily in damages for trifling with her affections, and injuring her prospects of settling with some other one for life. List to the graphic way in which the judge of the Supreme Court of Missouri speaks: "Fully realizing then" (because he had just told her so) "that she had indeed lost the love that he had once assured her was hers, and upon the faith of which she had engaged herself to him, and that his determination not to marry her was final and conclusive, she takes from her finger the engagement ring once given her as a token of his sincerity and fidelity, now a memento only of his fickleness and treachery, and in her express words, 'gave it up to him,' and went crying from his presence. This, forsooth, is claimed to be evidence that the plaintiff agreed to rescind the contract and release the defendant from the obligations thereof.... The defendant by his own action had left her no choice in the matter, nothing that she could do but accept the situation he made for her, abandon all hope of the marriage, give up the symbol of that hope, and seek such compensation in damages as the law could give her for the injuries she had suffered, without fault on her part, at the hands of the defendant; and this, the only remedy left her, she seeks in this case." And she got it (*Kraxberger v. Roster*, 91 Mo. 404).