

Ontario Judge, that the remuneration of the professional man "can be better estimated by the result attained and the care and skill shewn in what is done, than by any summation of items each attached to an individual move in the game played with living persons." Solicitors have thought that the magnitude of the interests involved for the client should have some bearing on the amount of the charge they are entitled to make. This feeling has been evidenced by the tariffs adopted by various County Law Associations, providing for fees proportionate to the value of the property dealt with, the amount of the capital of companies incorporated, etc. It also appears in the somewhat general practice followed by many solicitors when delivering bills to their clients, of setting out in detail the services rendered and charging at the end of the bill what is called a "lump fee" to cover all. It has, however, been almost universally accepted that the law did not recognize the principle of the County Association tariffs, and the "lump fee" bill, and that if trouble arose between the solicitor and his client necessitating taxation or suit to recover the amount charged, the solicitor, if required, must furnish detailed charges. The very recent decision of the Second Appellate Division of the Supreme Court of Ontario, in the case of *Lynch-Staunton v. Somerville*, 15 Ont. W.N. 303, reversing the same case in 43 O.L.R. 282, is one of much interest to the profession at large, and will undoubtedly have a marked bearing on the form taken by bills of costs hereafter delivered by solicitors to their clients. The result of the decision would appear to be that in, at all events, the majority of bills, detailed charges are unnecessary for the purposes either of action or taxation.

When the importance of the question to the profession is considered, it is somewhat surprising that there are not more reported decisions on it than can be found in the reports. The cases where the solicitor has been allowed to charge by way of "lump fee" or on a commission basis are very few. Among the earliest in Ontario are *Re Richardson*, 3 Ch. Ch. R. 144, and *Re Attorneys*, 26 U.C.C.P. 495. The basis of these decisions appeared to be that the percentage principle might be applied where the work done by the solicitor was similar to that of an ordinary