A case tried recently at Chester assizes before Mr. Justice Stephen deserves notice, as an instance of reconsideration of a case by a jury after a verdict of guilty had been returned. The facts, as stated by the *London Telegraph*, are that a coal agent named McLean had been put upon trial charged with embezzling sums of money belonging to the Lancashire Coal Company. The prisoner's counsel, in a forcible speech, contended that the accounts had only been muddled. The whole deficiencies discovered amounted to £230. The jury found McLean guilty, and the judge commenced to pass sentence, when the prisoner appealed to his lordship to allow him to make a statement. His explanation was that the deficiency was quite accounted for by the fact that three hundred customers had left Birkenhead owing to bad trade, who had not paid him. Several instances were recalled, and the judge said, whether the proceeding was regular or not, he would undertake the responsibility of asking the jury whether, after the prisoner's statement, they wished to hear him (the judge) with reference thereto, and to reconsider their verdict. The jury having decided in the affirmative, his lordship again addressed them, and the jury reconsidered their verdict with the result that they found the accused not guilty, and he was discharged.

The editor of the *Manitoba Law Journal*, whose name appeared in a recent list of Queen's Counsel, does not seem to set too high a value upon the dignity, for he immediately published an article advocating the abolition of the title. The *Law Journal* (London) also thinks the present system of conferring the honour might be improved. "It is an example of the want of independence of the bar," observes our English contemporary, "that the question of precedence should have been left to the Crown to decide instead of being retained under the control of the bar itself. The Lord Chancellor would probably be glad to be relieved of a troublesome and disagreeable duty, and if the bar were to lay down for itself the circumstances in which any of its members may anticipate his seniority, there is no doubt the courts would fully recognize the arrangement. No regret would be felt at the abolition of the anomalous dignity of Queen's Counsel, which is a comparatively modern institution, originating not in any consideration of merit or convenience, but purely in court favor; and the opportunity might be taken of reviving, in a new form, the ancient order of serjeants, if the Crown should be graciously pleased to place that title at the disposal of the bar."

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*SUPERIOR COURT—MONTREAL.**

Inscription en droit—Exception à la forme—Articulation de faits.

JUGÉ:—1o. Que lorsque le défendeur a plaidé une exception à la forme, puis une défense en droit, le demandeur ne peut inscrire en droit avant que l'exception à la forme ait été jugée.

2o. Que l'on ne peut sur une exception à la forme produire des articulations de faits.—*Lachambre* v. *Normandin.*

Enregistrement—Renouvellement—Hypothèque—Collocation—Rang.

JUGÉ:—1o. Que le renouvellement de l'enregistrement d'un titre, dans les délais prescrits, là où le cadastre devient en force, n'est nécessaire que pour les droits réels consentis sur un immeuble, c'est-à-dire, les hypothèques ou autres charges constituant le *jus ad rem;* et qu'il n'est pas nécessaire pour les droits dans la propriété, *jus in re.*

2o. Que lorsque ce renouvellement est nécessaire, s'il est fait, il valide tous les titres qui découlent du titre enregistré, même ceux antérieurs au renouvellement, lesquels conservent leur rang.—*Surprenant* v. *Surprenant*, et *La Cie. de Prêt et Crédit Foncier.*

Election municipale—Cité de Montréal—Contestation—Délai pour contester—Obligation conditionnelle—Avantages matrimoniaux—Gains de survie—Evaluation municipale—Mise en demeure.

JUGÉ:—1o. Que les échevins, pour la cité de Montréal, ne sont, d'après la charte de cette dernière, réellement élus que lorsque sur le rapport du bureau des réviseurs, le con-

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