

the work has since devolved upon the Superior Court judges in Montreal. After a lapse of five months, the district magistrates have somewhat unexpectedly been appointed judges of the Circuit Court. Here again it would have been very desirable by prompt action to have prevented the names of other gentlemen from being discussed in the newspapers as candidates for the vacant positions.

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As regards the Superior Court appointment, Mr. Archibald has been a hard-working and successful lawyer, and coming to the bench as he does with ripe experience, there is every reason to expect that he will be an efficient and capable judge.

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In *Toupin v. The Montreal Harbour Commissioners*, Superior Court, Davidson, J., Montreal, June 30, 1893, it was held that the Board of Harbour Commissioners, Montreal, constituting in its corporate character the "pilotage authority" of the pilotage district, has no power to delegate to a committee its functions with respect to the investigation of charges against pilots. This nullity cannot be covered by acquiescence on the part of the accused. It was also held that the law requires the evidence in such investigations to be taken upon oath. Three commissioners make a quorum for such investigations, so that no inconvenience need result from requiring the Board to sit as a Board.

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The attack made some time ago by one Norcross upon Russell Sage has given rise to a peculiar claim for damages, which came recently before the N. Y. Supreme Court—*Laidlaw v. Russell Sage*. A letter had been handed to the defendant, Sage, by a visitor, containing a threat that if he did not give said visitor a large sum of money, the latter would immediately explode a package of dynamite then in his possession. Plaintiff, who was ignorant