entered in a book of accounts, the conclusion is inevitable that the last entry correctly represents the total. It may be that, as a general rule, if a witness, after refreshing his memory from a contemporaneous writing, can speak from his memory, the writing is not admissible in evidence. But if the writing be an account consisting of a mass of figures, he may refer to the paper if he knows it is correct, and testify from it; and we see no reason why it should not be introduced—not as original evidence, but as showing distinctly the specific account to which he has testified. *White* v. *Ambler*, 8 N. Y. 170; *Insurance Co.* v. *Weide*, 6 Wall. 680; Abb. Tr. Ev. 321. Here it was proved that the accounts which were offered from the books consisted of entries made from the scale-book at the end of each day's transaction, and that the scale-book had been lost or destroyed; and we are, therefore, of the opinion that the book was properly admitted as tending to prove the weights of the wheat which was shipped from McKinney." —*Albany Law Journal.*

LIMITS OF THE PRIVILEGE OF PUBLIC WRITERS.—In the Queen's Bench Division, on April 18, before Baron Huddleston and a special jury, Samuel Peters, Secretary of the "Workmen's National Association for the Abolition of Foreign Sugar Bounties," sued Charles Bradlaugh, M.P., to recover damages for having, on December 3, 1887, falsely and maliciously printed and published of and concerning him in the *Times* newspaper the words following: "I had, from my place in Parliament, offered to prove that leading Conservatives, including Lord Salisbury, had given cheques to promote the meetings of the unemployed which had preceded, and, as I believe, aided in the riots of Trafalgar Square. I am ready directly Parliament meets, to trace several cheques signed by leading members of the Conservative party, including one signed by the Marquis of Salisbury, some of which were payable to S. Peters, all of which I believe passed through the hands of S. Peters, and which were used in connection with the so-called fair trade meeting of the unemployed which preceded the riotous meetings in Trafalgar Square." The defendant pleaded privilege and justification. Baron Huddleston, in summing up, explained to the jury that anything which reflected upon the character of any one, if written and published, constituted a libel, and proceeded to trace the law relating to libel before and after Fox's Act. They, therefore, would have to look at the words of the libel and say whether or not they bore the construction put upon them by the plaintiff. No doubt it was right that public writers should be allowed some extent of comment, and it would not be right to be too nice on such points. But the facts commented upon must be true. The first question was, therefore, Was this statement of the defendant's true? If it was, then Mr. Bradlaugh was entitled to say that it was privileged. But so long as he continued to administer the law he would most strenuously uphold that it was no defence in an action for libel for the defendant to say, "Oh! I *bona fide* believed what I wrote was true," when the words reflected upon the plaintiff's character. The learned judge referred to *Campbell* v. *Spottiswoode*, 32 Law J. Rep. Q. B. 185, as a case that was always recognised and fol-