

criminal law, Statutes of Canada, Orders in Council, and the official *Gazette*, all of which will be of great value to the associations, in that the money hitherto spent on these books can now be applied in the purchase of reports so much needed. Even the libraries of the York and Hamilton Law Associations, large as they are, owing to the continued and untiring exertions of a few of the officers and to donations from friends, are, notwithstanding, still deficient in many respects, and it is to be hoped that the Government will see fit to grant the petition of the deputation for a sum of money to be given to the county judges for the purpose of being expended on works of criminal law to be placed upon the shelves of the libraries of the associations wherever they exist.

We think that those of the profession, and especially the junior members, who do not belong to our local law association, do not realize the store of legal literature that lies at their very doors; but there are a large number, and increasing, we are told, every day, who do not now find it necessary to make the longer journey to Osgoode Hall to look up a point of law when they can find all they want in the Court House library. We understand, too, that, in order to induce the junior members of the profession to join, any barrister or solicitor in the county may pay the annual fee of two dollars, which entitles him to the use of the library, with a right to vote at all general meetings. We would also refer to our remarks *ante* p. 45.

What we have said with regard to the libraries of the York and Hamilton Law Associations must *a fortiori* apply to those of the outside associations where, although the collection of books may not be so large, each additional subscription—and this applies to all associations—goes towards the purchase of new books, so that each member directly increases the value of the library. The old adage does not apply in this case, for with more members we have "the better cheer."

The law associations should not only feel indebted to the gentlemen who were instrumental in bringing this matter to the attention of the Government, but should, and no doubt will, appreciate the prompt action of the Minister of Justice in so readily complying with their request.

#### COMMENTS ON CURRENT ENGLISH DECISIONS.

The Law Reports for March comprise (1892) 1 Q.B., pp. 273-384; (1892) P., pp. 69-95; (1892) 1 Ch., pp. 101-321; (1892) A.C., pp. 1-89.

PRACTICE—ATTACHMENT OF DEBT—GARNISHEE ORDER—TRUST FUND IN HANDS OF GARNISHEE—COUNTER-CLAIM OF GARNISHEE.

In *Stumore v. Campbell & Co.* (1892), 1 Q.B. 314, the Court of Appeal (Lord Esher, M.R., Lopes and Kay, L.J.J.) have decided that a garnishee who has a counter-claim against the judgment debtor, to whom he is indebted, cannot set that counter-claim up as a defence to the claim of the attaching creditor to attach the debt. In this case the garnishees were solicitors, in whose hands the judgment debtor had placed a sum of money for a specific purpose, which had