unnecessary to do so." In the *Berkeley Peerage Case* which is now being heard before the Privileges Committee of the House of Lords, a letter signed by George IV. was held inadmissible, but without any direct overruling of *Abignye* v. *Clifton*, Hol. 213, in which the simple certificate of James I. as to what passed in his hearing was admitted in evidence *in the lifetime* of His Majesty. *Abignye* v. *Clifton*, however, is a case which has been very much questioned (see Best on Evidence, 7th edit., p. 185), and the better opinion seems to be that the evidence of the sovereign, if given at all, must be given on oath (see Taylor, citing 2 Lord Campbell's Lives of the Chancellors, 510). It is, of course, perfectly clear, as was pointed out by Baron Parke in *The Attorney-General* v. *Radloff*, 10 Ex. p. 94, that the sovereign cannot be compelled to give evidence, and we think it to be equally clear that the deduction of Baron Parke from this, to the effect that the sovereign cannot be a witness at all, was quite unsound. The fact, however, remains undoubted, that in no case has the sovereign yet appeared as a witness, and that Charles I. took upon himself to direct the judges of his day to leave the question of admissibility of his evidence an undetermined one in point of law.—*Law Journal.*

EVIDENCE OF A JUROR.—At the recent Bedford Assizes, a prisoner on his trial for rape, after giving evidence himself in denial of the charge, under the Criminal Law Amendment Act, 1885, proposed to call one of the jurors as a witness to his character. Mr. Justice Williams declined to allow the juror to be sworn, but said that he might give his fellow-jurors the benefit of his knowledge in deliberating on the verdict, and this having been done the jury acquitted the prisoner. We have much doubt whether the practice pursued was in accordance with precedent. It appears to be a settled rule (see Best on Evidence, 7th edition, p. 193) that a juryman may be a witness for either of the parties to a cause which he is trying, and "it is essential that this should be so, as otherwise persons in possession of valuable evidence would be excluded if placed on the jury panel, and might even be fraudulently placed there for the purpose of excluding their testimony." It is said, too (see Starkie on Evidence, 3rd edition, p. 542), that if a juror know any facts material to the issue he ought to be sworn as a witness, and if he privately state such facts it will be ground of motion for a new trial. The rule was applied to a criminal trial in *Regina* v. *Rosser*, 7 C. & P. 648; and though we can find no instance of its being applied to a witness merely to character, we cannot but think that it ought to be applied to such a witness, on the ground that the test of cross-examination cannot be properly employed to testimony privately given in the jury-box. It is true, no doubt, that witnesses to character are seldom cross-examined, but their liability to cross-examination is undoubted. Moreover, if evidence as to character be given privately in the jury-box, there will not be the same facility for the prosecution, under 6 & 7 Wm. IV., c. 111, giving evidence, if they should happen to possess it, that the prisoner has been previously convicted of felony.—*Law Journal.*