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We are glad to know that the views we ventured to express on the subject of judicial courtesy have been favorably commented upon, not merely by the Bar, but by members of the Bench. It would not, in this connection, be out of place, but simply and only to show the thought of those to whom our government might naturally look for guidance in such matters, to repeat the well known observation of one of England's greatest Chancellors, who is reported to have said, "My judges must be gentlemen, and if they know a little law, so much the better."

We follow the example of a contemporary in referring to what is described as a widespread belief still existing, that when a cheque is sent in settlement of a claim the creditor must return the cheque if he wishes to say that a sum larger than the amount of the cheque is due to him. Reference is made to the cases of *Miller v. Davies* and *Day v. McLea*, 58 L. J. Rep. Q.B. 293, 294; L.R. Q.B.D. 610, 612. In both these cases the defendant had sent to the plaintiff a cheque for a smaller amount than was claimed, stating that it was intended to be in settlement of the plaintiff's claim. The plaintiff replied that he accepted the cheque on account, and it was held that he was not precluded from suing for the balance of his claim, the keeping of the cheque not being, as a matter of law, conclusive that there was accord and satisfaction, but rather that it was a question of fact on what terms the cheque was kept.

Our namesake in England says that the accounts received from different parts of the country as to the working of the Criminal Evidence Act, which enables all persons charged