

the exemptions must be reduced in number. Accordingly, at a meeting of Convocation held on September 21st, certain Rules were passed, of which the Secretary was instructed to give the students immediate notice. The object of these Rules is to increase the attendance during the first term of the school. This result is sought in three ways. All students and articled clerks in Toronto who are entitled to present themselves for either the first or second Intermediate Examination in any term before Michaelmas Term, 1890, must attend the school during the session of 1889-90, and take the examination at the end of the school term. All students and articled clerks outside of Toronto who are entitled to present themselves for either the first or second Intermediate Examination in any term before Michaelmas Term, 1890, may attend the school during the session of 1889-90, and take the examination at the end of the school term. Honours and scholarships on the first and second Intermediate Examinations are to be awarded only at the examinations of the Law School, and the number of scholarships is increased, there being one of one hundred dollars, one of sixty dollars, and five of forty dollars. The Legal Education Committee may, under special circumstances, relieve any student or clerk from compulsory attendance under the Rule of 21 September. The session will not begin this year until 7 October. The attendance will be somewhat small for two years, notwithstanding the recent change. Then numerically the school will become a flourishing institution, and we hope that it will leave lasting monuments of its usefulness in the profound legal scholarship and distinguished career of many of its pupils.

COMMENTS ON CURRENT ENGLISH DECISIONS.

We continue the Law Reports for July comprised in 23 Q.B.D., pp. 1-135; 14 P.D., pp. 73-85; and 41 Chy.D., pp. 213-438.

INFANT—GUARDIAN—NATIONALITY—ALIEN—FRENCH SUBJECT—NATURALIZATION.

In re Bourgoise, 41 Chy.D. 310, was an application to appoint a guardian to some infants resident in France who were entitled to a considerable amount of personal property in England. Before his marriage, the father of the infants, who was a Frenchman, came to reside in England in 1871 and obtained the usual qualified certificate of naturalization as a British subject under The Naturalization Act of 1870, s. 7, but he did not obtain the consent of the French Government to his becoming naturalized as a British subject. In 1880 he married an English lady and then returned to France where he resided until his death on 18th August, 1886. His will was made in French form, and by it he gave his residuary estate, which included considerable personal estate in England, to his widow for life, with remainder to his children, the infants in question; the widow died and a guardian was appointed to the infants by the French Courts. Kay, J., refused to interfere by appointing a guardian in England, because he considered the father was at the time of his death a French subject, and therefore the Court had no