

little doubt that if and when a reorganisation of the House of Lords is brought about, that will prove an opportune time for the establishment of the new court of final appeal, and that its nucleus will be found in the existing Judicial Committee of the Privy Council. A tribunal of this description, enlarged perhaps and sitting in more than one division, upon which all those who have to administer the systems of law that obtain throughout the Empire are represented, would be a truly actual and living Imperial Court of Appeal."

EXAMINATION OF BANK PASS-BOOKS.

Lord Halsbury, L.C., made it fairly clear in delivering his opinion in the historic case of *Bank of England v. Vagliano*, 64 L.T. Rep. 353, at p. 356, (1891), A.C. 107, that, so far as his view was concerned, a customer of a bank was "bound to know the contents of his own pass-book." That expression of his Lordship, however, followed almost immediately after a previous statement of his that he did not dispute the proposition that "the carelessness of the customer or neglect of the customer to take precautions unconnected with the act itself cannot be put forward by the banker as justifying his own default." Is the omission of a customer to examine, and make himself fully acquainted with, the contents of his pass-book carelessness or neglect so "unconnected with the act itself" as not to preclude him from recovering from the bank amounts paid in respect of cheques, the signatures to which were forged, although such cheques were debited to his account in the pass-book? An affirmative answer to that question is of such prime importance to a vast number of persons—for everyone who possess a banking account runs the risk of the forgery of his signature to a cheque—that it may well be anxiously sought for. And it is to be obtained from the judgment of Mr. Justice Channell in the recent case of *Walker v. Manchester and Liverpool District Banking Company, Limited*, 108 L.T. Rep. 728. The learned judge gave it as his opinion