

The head note of *Adams v. Sutherland*, 10 O.L.R. 645, describes the deposit of a sum of money with the sheriff as "special bail." We need hardly remind our readers that the term "special bail" as a term of art is properly confined to "bail above," as it used to be called, or "bail in the action," and does not include bail to the sheriff or "bail below" as formerly called (see Arch. Pr. 12th ed., pp. 801, 829). Bail in the action or "special bail" is to be given in one or two ways, either by payment into Court, or by a bond to the plaintiff by the defendant, or with the plaintiff's consent by any other form of security (see Rule 1036). The condition of bail to the sheriff is that the defendant will give bail in the action, or render himself (see Rule 1030), but the condition of bail in the action is that he will pay the debt or render himself (Rule 1037). The reporter may possibly have been misled by the learned judge having inadvertently used the expression "special bail" in his judgment.

One of our exchanges when speaking of the success of many Southern men who practise law in New York, says that their success may well be attributed in a large degree to their courteous, pleasant manners. A writer on the subject says that the full measure of unassuming courtesy is found in its perfection among the Southern lawyers. The reason given is that a very large portion of them are graduates of some college or law school in the southland where these principles of courtesy are exalted in the minds of the students. A leading judge has remarked that the polite deference of the younger men of the south for their elders was a noticeable and charming characteristic.

In referring to the same subject, a writer in the *Central Law Journal* makes the following excellent comments: "Few things are more important in the education of young lawyers than the development of good manners. Good manners will win many a narrowly contested case; and serve to win that undercurrent of human sentiment that in the last analysis unconsciously bends the human mind in the direction of its own desires. A gruff man will often win a good case, but a polite man will more often win