and a receipt indorsed for the purchase-money, although signed by the seller is of no avail in equity if the money be not actually paid (*Coppin* v. *Coppin*, *sup.*; see *Griffin* v. *Clowes*, 20 Beav. 61), though the receipt in the body of the deed, being under seal, amounts to an estoppel, and is binding on the parties at law. *Rountree* v. *Jacob*, 2 Taunt. 141.

The question between the plaintiff and the defendant company in *Lee* v. *Lancashire and Yorkshire Railway Company*, *sup.*, was, whether the receipt covered future and consequential injuries or not. The receipt was in terms a discharge of the plaintiff's claim in full upon the company, but the plaintiff alleged that he signed it on the express condition that he should not thereby exclude himself from further compensation if his injuries eventually turned out to be more serious than was then anticipated. A receipt, as we have seen, is an admission only, which may be contradicted or explained (*Graves* v. *Key*, *sup.*), and it was accordingly open to the plaintiff to traverse the plea by denying that he received the money paid him in satisfaction and discharge of his injuries, except the injuries then known; in which case it would be properly left to the jury to say whether or not he received the money in full satisfaction and discharge. But if the plaintiff had given a release under seal in similar terms, and the defendant company had pleaded it, his evidence could not have been received to explain the instrument. In that case, if fraud had been imputed to the defendant company, two courses would have been open to the plaintiff, viz.: either to meet the plea of the release by a replication of fraud at law, or to file a bill charging fraud, and praying that the defendants might be restrained from relying on the plea. Such a bill will lie, although it does not go on to pray for compensation or any other relief (*Stewart* v. *Great Western Railway Company*, *sup.*), although there is a concurrent remedy at law. But in *Lee* v. *Lancashire and Yorkshire Railway Company*, *sup.*, fraud was not imputed, and there was no relief in respect of the receipt, which the court could give plaintiff, which he could not equally well obtain at law by rectifying the plea, and adducing evidence to show that the receipt was not intended to exclude him from further compensation.—*Solicitor's Journal.*

GRAND JURIES.

The Grand Jury lately sitting at the Central Criminal Court, impressed with their uselessness, expressed a wish for their own destruction. They made a presentment to the effect that "in our opinion the office we have been called upon to occupy is useless, and ought as speedily as possible to be abolished. We consider that the ends of justice are not served by the presentation of indictments before us, after the decision of the magistrates who have had the advantage in the hearing of each case of the legal assistance engaged by both parties. The evidence adduced in all the cases shows how carefully the matters are investigated, and the necessary endorsement of a grand jury under the present system appears to involve a reflection on the decision of the magistrates, and a useless sacrifice of valuable time on the part of the jurymen. We, therefore, beg respectfully to express our hope that steps may speedily be taken to abolish altogether the said office." There can be very little doubt that when a case has once been investigated by a qualified magistrate, a secondary preliminary examination before a grand jury is not much better than a waste of time. And it probably rarely happens in cases coming before the Central Criminal Court that an innocent man is committed for trial through any incompetence or default on the part of the committing magistrate. It will easily be conceived too by any one who read the evidence taken before the House of Commons Select Committee on juries, two or three years ago, as to the constitution of London grand juries, that their investigation of the charges brought before them has not always been of the most searching or intelligent nature. But though we are not disposed to quarrel with the general estimate which the late grand jury form of the value of their own services in reviewing the decisions of magistrates, and though we quite sympathise in their complaint of the loss of time which they have themselves to incur, it does not follow that the case is to be met by the pure and simple abolition of the grand jury without either qualification or the provision of a substitute. It must be remembered that, notwithstanding the Vexatious Indictments Act, indictments may still in many cases be preferred without any preliminary investigation before a magistrate. There are many offences, for instance, to which the Act does not apply at all, and of which an accusation may be brought without any previous investigation; and in such cases it would, we think, be very undesirable that a prosecutor should be able to call upon an accused person to stand his trial before a petty jury without some previous security that there is at least a *prima facie* case against him. Again, prisoners may be and are committed for trial on the verdict of a coroner's jury. And, assuming a coroner and his jury to be as fit a tribunal for investigating charges of crime as a magistrate, it must be remembered that the object and character of the magistrate's inquiry and the coroner's are wholly different. The magistrate examines directly the very question which has afterwards to be tried by the petty jury—the guilt or innocence of the accused person. The coroner inquires generally into the cause of death of the person on whom the inquest is held; the question of guilt or innocence in any particular person arises only incidentally, and the inquiry into the latter question is