

ever, held that the rule laid down in *Rex v. Meade* did not apply, and that drunkenness was no defence unless it could be established that at the time of committing rape the accused was so drunk that he was incapable of forming the intent to commit, which was not alleged in the present case, inasmuch as the death resulted from a succession of acts, the rape and the act of violence causing suffocation, which could not be regarded independently of each other, and although their Lordships were of the opinion that Bailhache, J., was mistaken in applying the test of insanity to a case of drunkenness not amounting to insanity, yet read as a whole, the summing up did not amount to misdirection. They therefore restored the conviction of murder.

Bench and Bar.

APPOINTMENTS TO OFFICE.

George W. Holmes, of the City of Toronto, to be Master of Titles, vice J. G. Scott, K.C., retired. (Dec. 18.)

Flotsam and Jetsam.

We extract the following from an article in the *Central Law Journal* entitled "The Crime Wave— Its Causes and Cure." The writer truly says: "The cure of crime in this respect, therefore, is a strong revival of belief in the supernatural to counteract the gross materialism of present-day philosophies. Mere social service agencies will not take the place of deep religious convictions. There must be some restraint imposed by a person's own conscience and sanctioned by faith in a Supreme Being who punishes disobedience and rewards faith and virtue before there can be any sound basis for a law-abiding organization of society."

We concur, and commend the above to the attention of all to whom it applies, and that means everybody.

The subject of Legal Aid came before the American Bar Association in St. Louis, U.S.A., last August, and seems to have created considerable interest there. A "Legal Aid Society" is an agency supported by private or public funds which pays the salaries of a staff of lawyers, with offices for that purpose. It is not a feature with us, as there has not been any crying necessity for it so far. The need may be felt hereafter; and when it does information can readily be obtained from those who have had experience therein. The *Central Law Journal* (Nov. 19, 1920) devotes six pages to the discussion of the relation between Legal Aid Work and the administration of justice.