

Law Review says: "One may fairly argue that the inducement held out might very well have led the woman to lie, in order to obtain the charm or talisman. She might think it of great value to her, even though she was innocent, but granting the Court's position, that the favour promised was one that would induce none but a guilty person to confess, have we here the true test of admissibility? Are confessions obtained by promises of favour to be excluded for the sole reason that they lack credibility? There are numerous dicta to that effect. So Mr. Justice Keating, in *Regina v. Reason*, 12 Cox, 228; Mr. Justice Littledale, in *Rex v. Court*, 7 C. & P. 486; and Mr. Justice Coleridge, in *Rex v. Thomas*, 7 C. & P. 345. But in none of these cases, or others hitherto decided, has it been necessary to go so far as to hold that the sole ground of exclusion. May it not be that the true ground is an aversion on the part of English-speaking peoples to the use in criminal cases of evidence obtained by such questionable means? May it not be from a spirit of fair play to the defendant? That would seem to be the reason why confessions obtained by threats are excluded. At all events, such a feeling has always had great influence on the minds of English and American judges. Whether it is wise to be so careful of the prisoner is another and larger question. Protests against such an excessive solicitude are not wanting to-day, and among them one may, perhaps, count this North Carolina case."

ABSENCE OF MORAL SENSE—THE PLAISTOW MURDER CASE.

There are one or two points of legal and medico-legal interest in this case to which attention may profitably be directed. We observe that in some quarters rather severe strictures have been passed upon the line taken by Mr. Justice Kennedy in refusing to accept the first verdict which the jury returned—viz. 'Guilty, but with a recommendation to mercy on the ground that Robert Coombes did not realize the nature of his act at the time when he committed it.' If this rider meant 'recommended to mercy on the ground of defective intellect,' it would, of course, be difficult to defend the learned judge's ruling. Such verdicts are perfectly legal—are returned every day—and, in the recognition which they involve of the theory of modified responsibility in mental disease, constitute a very gratifying evidence of the pro-