

during the progress of the war. But one thing is certain: legislation will be necessary if woman is to be admitted to the Bar. When a woman did apply for admission to the Bar she was refused by the Benchers. An appeal lay, as of right, to a committee of the judges. To this committee she presented, in person, a formidable argument, but in vain. The appeal was disallowed for the reason that "there was no precedent for admitting a woman to the English Bar." Volumes could not have said more!

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NEWSPAPER CRITICISM OF PUBLIC MEN.

At no time in the world's history, probably, have the words and works of public men been so discussed and criticized in public as they have been since this great war began. It is well that this should be, within, of course, reasonable and patriotic limits. The subject of newspaper criticism of public men has recently been discussed by the House of Lords in the case of *Levy & Company v. Langlands*, reported in the *Times* of January 22nd. A writer in the *Solicitors' Journal*, in referring to this case, says that in no previous case has any Court expressed in such emphatic terms the distinction between the public and private life of a citizen as a legitimate subject of criticism in the press as has just been done in the above case. The law on the subject as laid down by the trial judge, and confirmed by the House of Lords, is, that in the case of an attack on a man's private character, any words apparently imputing improper motives will be, *prima facie*, construed to shew malice in law, and to be actionable, so that the defendant is called upon to rebut this inference, and prove his plea of fair comment. But where a man's public character alone is the subject of attack, there is an implied right to comment on it in the public interest, and such criticism is presumed to be intended for the public benefit; malice in law will not therefore be presumed, and evidence must be given of malice in fact.