dressed could be considered the signature of the defendants. From the evidence it appeared that the memorandum had been prepared by a clerk of the defendants, who had been authorized to draw it up and get it signed by the plaintiff. Under these circumstances, following *Schneider* v. *Norris*, 2 M. & S. 286, where a lithographed bill-head had been held a sufficient signature of the names mentioned therein, Denman and Cave, JJ., held that the name "H.M. & Co." was a signature by the defendants, so as to make the memorandum sufficient under the Statute of Frauds.

LUNATIC, CONTRACT BY—DEFENCE OF LUNACY—EVIDENCE—ONUS OF PROOF.

Imperial Loan Co. v. *Stone* (1892), 1 Q.B. 599, was an action brought on a promissory note made by the defendant, to which was pleaded a defence that at the time the defendant made the notice he was lunatic, and that the plaintiff knew of the defendant's insanity. At the trial, Denman, J., left it to the jury to say whether the defendant was insane and whether the plaintiff knew he was so. The jury found that the defendant was insane, but disagreed as to whether the plaintiff had knowledge of his insanity. Upon this finding the judge gave judgment for the defendant. The Court of Appeal (Lord Esher, M.R., Fry and Lopes, L.JJ.), however, set the judgment aside and ordered a new trial, holding that the defence could not succeed unless the defendant established that the plaintiff had knowledge of his insanity at the time of the contract.

PRACTICE—REFUSAL OF LEAVE TO APPEAL—APPEAL FROM DECISION REFUSING LEAVE TO APPEAL.

In re Housing of Working Classes Act, ex parte Stevenson (1892), 1 Q.B. 609, the Court of Appeal decided that where a statute gave a party a right of appeal from an award upon obtaining the leave of the High Court or of a judge in chambers, and a judge in chambers had refused to grant such leave, no appeal would lie from his decision refusing such leave. The principle of this decision would appear to apply to all cases where the right to appeal is dependent on leave being obtained; *e.g.*, to appeals under Ont. Jud. Act, ss. 65, 66, 67, 69.

NOTICE OF ACTION—SUFFICIENCY OF STATEMENT IN NOTICE OF ACTION OF PLACE WHERE ACT COMMITTED.

In *Madden* v. *The Kensington Vestry* (1892), 1 Q.B. 614, the defendants were entitled to notice of action, and the notice served stated the act complained of had been done in Silver street, whereas the evidence showed that it was in Uxbridge Road, opposite Silver street, about twenty feet from the end of that street, which joined the Uxbridge Road. Denman and Cave, JJ., were agreed that the notice was sufficient.

JUSTICE—PRACTICE—SUMMARY TRIAL WITH CONSENT—CONVICTION—APPEAL TO GENERAL SESSIONS—SUMMARY JURISDICTION ACT, 42 & 43 VICT., C. 49, SS. 12, 19—(R.S.C., C. 176, S. 8; C. 178, S. 76).

The Queen v. *Justices of London* (1892), 1 Q.B. 664, is a case in which a prisoner charged with larceny elected to be summarily tried before a magistrate under the Summary Jurisdiction Act (see R.S.C., c. 176, s. 8), and it was held by Lawrance and Wright, JJ., that no appeal would lie from the conviction to the Quarter Sessions. The decision, however, to some extent, turns on the word-