

Court. R.S.O. c. 80, s. 10, however, applies to orders of County Courts as well as to orders of the High Court.

CRIMINAL LAW—FALSE PRETENCES—EVIDENCE—GUILTY KNOWLEDGE—ACTS IN RESPECT OF WHICH DEFENDANT HAD BEEN PREVIOUSLY ACQUITTED.

The Queen v. Ollis (1900) 2 Q.B. 758, was a prosecution for obtaining money by falsely pretending that three cheques which the accused gave to the prosecutors were good and valid orders for the payment of money. The accused had been previously acquitted on a similar charge on the prosecution of another person, and the question submitted to the Court for Crown Cases Reserved was whether the facts connected with the charge on which the accused had been acquitted could be given in evidence to shew that he had no reasonable ground for believing that there would be funds to meet the cheques on which he obtained the money from the prosecutors in the present case. The Court (Lord Russell, C.J., and Mathew, Grantham, Wright, Darling, Channell, Bruce, and Ridley, JJ.) held that the evidence was admissible; Bruce and Ridley, JJ., dissented, on the ground that a cheque is not like a coin, which is either inherently good or bad, but is a thing which may be good or bad according to circumstances which might vary from day to day; and that, therefore, the passing of a cheque for which there were no funds on one day, would not be evidence that a cheque passed on another day was also bad to the knowledge of the person passing it. The majority of the Court, however, adopted the broader view that the fact that the accused had on another day passed a cheque which had been dishonoured, was a circumstance to shew a course of conduct on the part of the accused, and that the passing of the cheques in question was not a matter of forgetfulness, but that they were bad to his knowledge.

MARRIED WOMAN—CONTRACT OF MARRIED WOMAN—PROPERTY LIABLE TO EXECUTION AGAINST MARRIED WOMAN—RESTRAINT UPON ANTICIPATION—MARRIED WOMEN'S PROPERTY ACT, 1893 (56 & 57 VICT., c. 63) s. 1—(R.S.O. c. 163, s. 4).

Barnett v. Howard (1900) 2 Q.B. 784, was an action against a married woman in which judgment had been recovered against the defendant in the form settled in *Scott v. Morley*, with such variation as was necessary to make it conform to the Married Women's Property Act of 1893. That Act, s. 1, provides that the