The real question in the case, however, is the question of fact I have already alluded to. Do all the transactions between Joly and his friend Langlois show sufficiently and clearly that Joly is the real owner, and Langlois is only the pretended owner? It is very difficult to give a confident and decisive opinion on this question. It is a question of appreciation of evidence, and of inference from facts. I have weighed it all as carefully as I can, and I have come to the conclusion that although the circumstances may show clearly, that in all Langlois did he was desirous of protecting his friend Joly from the hostile action of his creditors, there is nothing to show that he (Langlois) is not the real owner. Creditors are suspicious naturally enough under such circumstances, but that is a very different thing from saying that Langlois is to lose his property, or that any hope or design the parties may have had that Joly might some day become the owner, is to expose Langlois to lose his present rights.

Opposition maintained.

C. L. Champagne, for opposant.

Geoffrion & Co., for plaintiff contesting.

GENERAL NOTES.

An esteemed correspondent at Quebec, with the tone of whose communication we certainly have no reason to be dissatisfied, thinks a recent reference to our "modern legislators" to be somewhat *déplacé*, in the columns of the *Legal News*. Our correspondent is perfectly right in assuming that we do not propose to allow politics to intrude upon our space. At the same time it may be remarked that the *Legal News* is not exclusively (as our correspondent implies) a mere report of judicial proceedings. It is an independent journal devoted to legal topics, and, as such, it follows the course adopted by the leading journals of the law in England and the United States, in offering a free and unbiassed criticism of such matters pertaining to the law, and to law-makers and administrators, as may seem to merit attention.

The manner in which certain lady taxpayers propose to demonstrate their fitness to take part in the government of the country—namely, by lawlessly declining to pay the Queen's taxes—will be found attended with some difficulty. The maxim of law that an Englishman's house is his castle may be admitted to extend to an Englishwoman, so that if she keep her door shut against the sheriff's officer, armed with the ordinary writ of *fi. fa.*, the blockade cannot be raised by breaking the door open. Crown debts are, however, not recovered by a *fi. fa.*, but by the more effective weapon of a 'writ of extent,' under which the 'body, land, and goods' of the fair recalcitrants would be seized. The seizure of their bodies would delight these candidates for martyrdom, but the necessities of the revenue would be fully answered by taking their property. If they shut their doors against the sheriff, he will be bound, after politely asking them to surrender, to break the doors open by force. This law is at least as old as the reign of James I. It is reported by Lord Coke in *Semayne's Case*; and, although Lord Coke did not get on well with the ladies of his family, he was a very accurate reporter.—*Law Journal* (London).

In commenting upon Eno's case, the *Evening Post* points out that an offence, in order to be extraditable, must be the offence understood by the name given to it in the treaty in both of the countries which are parties to the treaty and not in one only. There is no doubt that the offence charged against Eno is not forgery in England, and that an indictment against him for forgery would not lie in England. The *Post*, however, seems to assume that Eno has committed what may be described as "American forgery," and that is not the case either. He has only committed New York forgery. Many American decisions go the length of the English doctrine, quoted by the *Post*, that "telling a lie does not become a forgery because it is reduced to writing." In Massachusetts it has been held "that the mere false statement or implication of a fact, not having reference to the person by whom the instrument is executed, will not constitute the crime." The cookery of accounts to cover an embezzlement is forgery by the statute of New York only, and, of course, it is even more preposterous to maintain that the extradition treaty must be construed by the statutes of one State than if such a construction were general in this country.—*N. Y. Times*.

The Washington *Law Reporter* gives the following statement of three months' work of the United States Supreme Court:—"The last volume, 109, of the United States Supreme Court Reports, covers a period of three months, October 15, 1883, to January 7, 1884, and in that time shows 90 cases decided by the court. Of these the chief justice delivered the opinions in 20, Judge Blatchford in 13, Matthews in 13, Woods in 12, Gray in 9, Bradley in 6, Harlan in 6, Miller in 6, and Field in 5. There were 12 dissenting opinions, of which no less than 5 were by Judge Harlan, 3 by Field, 2 by Gray, and 1 each by Miller and the Chief Justice. The longest opinion in the volume is that in the Civil Rights Cases, *U. S.* v. *Stanley*, which covers 59 pages, of which 36 are devoted to Judge Harlan's dissent."

W. D. Thompson, in the *American Law Review*, says of the late Charles O'Conor:—"He was a model to the bar and an honor to his country. He used no dishonorable means to win the favor of a jury. He was no orator; but by plain statements of facts well marshaled he rarely ever lost a doubtful case. As a man, his character was unimpeachable. He was honest, stern, upright, and noble. He was seldom known to smile. He was like the younger Pitt: 'Modern degeneracy had not reached him.' No political corruption, state chicanery, or bribes could induce him to swerve from the path of duty. All his sayings and actions bespoke of energy and a powerful intellect."