

that a lithographed endorsement was not a signature within that provision; and that, therefore, the decision of the deputy County Court judge was right, and the plaintiff was not entitled to recover.

Rule discharged.

SENTENCES ON PRISONERS.

There has been much correspondence on the method of sentencing prisoners adopted by the Recorder of Liverpool. The principle which he adopts in regulating his sentences is to proportion the punishment to the offence, and not to give outrageous sentences, which strike with horror those who hear them for the first time, but gradually become natural and tolerable to those who hear them frequently. The reason for advocating this principle was the effect that such punishments had upon the moral nature of the criminal, it being stated that a woman who had been leniently sentenced after several previous heavy terms of imprisonment had not troubled the Recorder's Court again. Sir Henry James, in commenting on lengthy sentences, endeavoured to show that the Recorder's address was in reality a call to society to arouse itself and prevent the recurrence of lengthy barbarous punishments. He stated that he was confident that the action of the Recorder would establish that even the most hardened criminals could be more influenced for good by being afforded opportunities of amendment than by receiving severe sentences, now so often imposed. It is suggested that a Court for the review of sentences should be established, and be within the reach of all. The Lord Chief Justice has also expressed concurrence with the Liverpool Recorder's views. On the other hand, the Recorder of Manchester, Mr. Yates, referring to the question of short *versus* long sentences, said he could not altogether agree with the Recorder of Liverpool in his recent remarks. In passing sentence, he (Mr. Yates) thought that the past life and conduct of the offender should be taken into consideration, whether, if previously convicted, he had tried to amend, or had committed a new crime as soon as he came out of prison.

While he set his face against anything like vindictiveness, he thought, above all, the public should be protected, and the circumstances of each case carefully considered. It was easy to assume the part of critic, but those charged with the administration of the law ought not to forget that the claim of duty was the highest of all.—*Law Journal*.

Lord Chief Justice Coleridge has addressed the following letter to a correspondent who drew his lordship's attention to Judge Hopwood's address to the grand jury of Liverpool advocating light sentences to prisoners, and asserting that the meting out of justice and mercy with discretion had had most beneficial effects in reducing the violence of many prisoners and the seriousness of their crimes: '1 Sussex Square, London, W., Jan. 18. Sir,—I thank you for the paper. Without pledging myself to details, I think that Mr. Hopwood's principles of punishment are certainly right.—Your obedient servant, COLERIDGE.'

CRIMINAL LAW—VIOLENCE OF HUSBAND.

In *Reg. v. Halliday*, 51 L. T. Rep. (N. S.) 701, before Lord Coleridge, C. J., Mathew, Cave, Day and Smith, JJ., in order to escape from the violence of her husband, who had used threats to his wife, amounting to threats against her life, the wife got out of a window, and in so doing fell to the ground and broke her leg. The husband was convicted of having wilfully and maliciously inflicted grievous bodily harm on his wife. *Held*, correct. Lord Coleridge, C. J., said: "I am of opinion that the conviction in this case is correct, and that the sentence should be affirmed. The principle seems to me to be laid down quite fully in *Reg. v. Martin*, 8 Q. B. Div. 54; 14 Cox C. C. 633. There this court held that a man who had either taken advantage of or had created a panic in a theatre, and had obstructed a passage, and had rendered it difficult to get out of the theatre, in consequence of which a number of people were crushed, was answerable for the consequences of what he had done. Here the woman came by her mischief by getting