The provisions of the Act regarding the rights of landlords do not appear to be very effective from a landlord's point of view. The assignment, or receiving order, puts an end to a landlord's right of distress, but does not appear to give him a first claim on the full value of the goods distrained for the rent to which he is entitled, but only in priority to other "debts," and it is therefore possible that the whole value of the distrained property may be eaten up by the trustee's fees and expenses.

Since the above was written, in *Re Auto Experts*, Mr. Justice Orde has decided that the Act does secure to a landlord a priority for his rent over the trustee's expenses.

Provision is made for appeals by creditors from the decision of the trustee regarding their claims, and appeals where the claim is under $500, and a good deal of other Court business under the Act, are committed to the Registrar.

We are inclined to think that the Act will need an early revision before it will satisfactorily answer the purpose intended; and in that revision we should hope to see a re-arrangement of some of its provisions.

EQUITABLE RELIEF IN COMMON LAW CASES.

Lawyers of the younger generation, who have grown up since the passing of the Judicature Act, and have a comfortable assurance in their minds that our Courts are Courts of Equity as well as Courts of Common Law, may perhaps be somewhat surprised to learn that a modern case may be lost for the reason that the action is one which before the Judicature Act would have been a purely Common Law action, to which the rules of Equity cannot even now be applied.

Section 16 of the Judicature Act, R.S.O. 1914, ch. 56, which prescribes the manner in which in every civil cause or matter Law and Equity shall be administered by the Supreme Court of Ontario, provides for the granting of equitable relief, and directs the Court to take notice of equitable rights and duties. However, this relief is to be the same as the Court of Chancery ought to have given in a suit or proceeding properly instituted