

istrate by a young woman who said that her husband had married her in his father's name, although his parents were not married, and that she doubted whether she was really married. In England a man is perfectly free to use a name to which he is, strictly speaking, not entitled in the view of the College of Arms, and if it be that by which he is usually known, he cannot be said to be married under a wrong name. And even where a person uses a false name, *i.e.*, one by which he or she is not usually known, the marriage is not invalid (under 6 & 7 Wm. IV., c. 85, s. 42), unless the falsity is known to the other party to the marriage ceremony (*Regina v. Rea*, 41 Law J. Rep. M. C. 92; L. R. 1 C. C. R. 365).—*Ib.*

LIBEL.—When Mr. Gladstone went to the theatre on the evening of the day on which the news of Gordon's death arrived, many people said hard things of him. It is not generally realised that imputing callousness of this kind is a libel in law. We are reminded of this by a case in the new volume of the 'Revised Reports' (*Churchill v. Hunt*, 1 Chitty, 480). Lord Churchill (the grandson of the great Duke) had by furious driving upset a carriage with a lady in it, with the result that the lady was so bruised and cut that she died; and the *Examiner* published the following comment: 'We are informed, but can hardly believe the relation, that though this young nobleman was fully aware of the shocking death of the lady, he on the very evening of the catastrophe attended a public ball.' This was held to be a libel. The editor who was guilty of this indiscretion was Leigh Hunt, who not long afterwards expiated in prison a similar indiscretion in calling the Regent a 'fat Adonis of fifty'.—*Ib.*

INGRESS AND EGRESS.—It is a maxim of English law that when a grant is made the grantor tacitly grants that which is necessary to the enjoyment of the thing granted. Access to demised premises is an obvious illustration. It is no use having, for instance, expensive chambers in Piccadilly if when you are out you cannot get in, and when in you cannot get out. But what is the measure of this implied right of ingress, egress, and regress? Is it enough if the landlord provides means of access sufficient for the average man, or must he go further and provide a means of access fitted for a Brobdignagian specimen of humanity, or does the tenant take the premises as he finds them? All sorts of cases occur to a lively imagination—a bed too short, a balcony too frail. Many country stiles present a fatal obstacle to some corpulent forms. Would action lie in such a case for obstruction of the highway? The answer is that the average man is the standard of English law. If you happen to be an abnormal specimen you must make special contracts.—*Ib.*