

held to be untenable, as the finding that the medicine might be injurious to infants prevented that doctrine applying. Secondly, that the medicine, being a proprietary medicine, was a patent medicine within the meaning of the exception in the Act; but, as to this, the Court of Appeal held that a "patent medicine" means a medicine protected by letters patent, and does not include mere proprietary medicines; but on this branch of the case it is necessary to note that the Ontario Act, as amended by 56 Vict., c. 28, and 57 Vict., c. 45, up to 1st July, 1895, expressly excepts the making and vending of both patent and proprietary medicines from its operation. The judgment of the Divisional Court (Charles and Bruce, JJ.) in favour of the plaintiff was affirmed.

BILL OF EXCHANGE—DAYS OF GRACE—ACCRUAL OF CAUSE OF ACTION—BILLS OF EXCHANGE ACT, 1882 (45 & 46 VICT., c. 61), ss. 14, 47 (53 VICT., c. 33, ss. 14, 47 (D.)).

*Kennedy v. Thomas*, (1894) 2 Q.B. 759; 9 R. Sept. 218, was an action on a bill of exchange which had been duly protested for non-payment. The action was commenced on the last day of grace after protest, and it was held by the Court of Appeal (Lindley, Lopes, and Davey, L.JJ.), reversing the judgment of Cave, J., that the action was premature, and that the cause of action was not complete until after the expiration of the last day of grace, following *Wells v. Giles*, 2 Gale 209, which, strange to say, does not appear to be cited in *Byles on Bills*.

CRIMINAL LAW—FALSE PRETENCES—INDICTMENT—EVIDENCE—COMPARISON OF HANDWRITING—28 & 29 VICT., c. 18, s. 8—(CRIMINAL CODE, ss. 358, 698).

In *The Queen v. Silverlock*, (1894) 2 Q.B. 766, the sufficiency of an indictment for obtaining a cheque by false pretences was in question. The indictment alleged that the defendant, by causing to be published in a newspaper a fraudulent advertisement (setting it out), did falsely pretend to the subjects of Her Majesty that (setting out the false pretence), by means of which last-mentioned false pretence he obtained from H. a cheque; and it was held by the Court for Crown Cases (Lord Russell, C.J., and Mathew, Day, Williams, and Kennedy, JJ.) that it was sufficient, notwithstanding it did not allege that the false pretence was made to any particular person. One other point in the case was whether a comparison of handwriting for the purpose of evidence