

out the Dominion. Where religious questions are concerned, it is always a matter of great difficulty to frame an enactment that shall be fair and just to all, but, at the same time, the supreme authority in matters of marriage and divorce must be the entire State, and the interference by any particular church cannot be tolerated.—*Law Times*.

JUDICIAL APPOINTMENTS IN ENGLAND.

To fill the vacancy created by the retirement of Lord Robson, Lord Justice Fletcher Moulton has been appointed a Lord of Appeal in Ordinary. This appointment is unexceptionable, and the judicial strength of the House of Lords will receive a notable accession by the elevation to that House of the learned Lord Justice. Sir John Fletcher Moulton, who was appointed to the Court of Appeal in January, 1906, from the Inner Bar, has shewn that he is possessed of a peculiarly wide and extensive knowledge of law, and an equal capability of applying that knowledge to the facts of any particular case. The frequency with which the House of Lords have adopted his dissenting judgments in preference to those of the other members of the Court of Appeal is ample evidence of the weight and authority which attaches to his opinion. The vacancy in the Court of Appeal will be ably filled by the appointment of Mr. Justice Hamilton to be a Lord Justice. Although, perhaps, some surprise may be felt at the elevation of the learned judge over the heads of certain of his brethren senior in standing, no one can doubt the excellence of the choice which has been made. Mr. Justice Hamilton had the reputation when at the Bar, of being very learned in that branch of the law which is most frequently administered in the Commercial Court, and has shewn, since his appointment to the Bench in 1909, that his learning is not confined to any particular branch, but embraces a wide knowledge of the common law and the principles of equity. The appointment of Mr. Rowlatt to succeed Mr. Justice Hamilton will occasion no surprise. Mr. Rowlatt has for seven years acted as