

faith, cannot revendicate the cord-wood, if the value of the work bestowed in making it greatly exceeds the value of the trees; and he can only claim the value of the trees when standing, if, moreover, he has suffered no damage beyond that value.—*Hall v. Hould*, (S. C.) 7 Q. L. R. 31.

*Proceedings in formâ pauperis*.—Les officiers de justice n'ont pas d'action pour leurs services contre les parties poursuivant ou défendant in *formâ pauperis*, qui ont succombé, mais ils ont droit à leurs déboursés, et le montant qu'accorde le tarif pour transport est un déboursé dont ils peuvent poursuivre le recouvrement.—*Dion v. Toussaint* (C. C.), 7 Q. L. R. 54.

*Tutor—Witness*.—Le tuteur plaidant en nom qualifié pour son pupille est témoin compétent pour ce dernier, et sa crédibilité peut seule être affectée par sa position dans l'instance.—*Thompson et al. v. Pelletier*, (S. C.), 7 Q. L. R. 59.

#### RECENT ENGLISH DECISIONS.

*Slander—Privilege*.—To an action for slander the defendant stated in defence that the words were spoken upon his examination on oath before a select committee of the House of Commons, which had been appointed by the House to inquire and report upon certain circumstances connected with the plaintiff, power being given to the committee to send for persons, papers and records. *Held*, on demurrer, that this was a good answer to the action.—*Seaman v. Netherclift*, L. R., 2 C. P. Div. 53; *Dawkins v. Lord Rokeby*, L. R., 7 H. L. 744. Q. B. Div., Feb. 25, 1881. *Goffen v. Donnelly*. Opinions by Field and Manisty, JJ., 44 L. T. Rep. (N. S.) 141.

*International Law—Jurisdiction over Foreign Sovereign*.—A foreign Sovereign or State is exempted by international law, founded upon the comity of nations, from the jurisdiction of the tribunals of this country, and therefore an action is not maintainable in our courts against a foreign sovereign or state. The only exceptions to this rule are; 1. Where a foreign sovereign or State has waived the privilege he possesses, and has come into the municipal courts of this country to obtain relief, in which case the defendant may assert any claim he has by way of cross-action or counterclaim to the original action, in order that justice may be done. 2. Where there are moneys in the hands

of third parties within the jurisdiction of the English courts, to which a claim is set up by a foreign sovereign, notice of an action against the third parties in relation to those moneys may be given to the foreign sovereign, that he may have an opportunity of putting forward his claim. Ct. of App., Nov. 17, 1880. *Strousberg v. Republic of Costa Rica*. Opinion by Jessel, M. R., James & Lush L. JJ. 44 L. T. Rep. (N.S.) 199.

#### GENERAL NOTES.

Lord Justice James died June 7, aged 74 years.

CHIEF JUSTICES OF ENGLAND.—The following is a list of Lords Chief Justices of the King's and Queen's Bench since 1756: Lord Mansfield, from 1756 to 1788, 32 years; Lord Kenyon, from 1788 to 1802, 14 years; Lord Ellenborough, from 1802 to 1818, 16 years; Lord Tenterden, from 1818 to 1832, 14 years; Lord Denman, from 1832 to 1851, 19 years, and the Right Hon. Sir Alexander Cockburn, Bart. G. C. B., recently deceased, from 1859 to 1880, 21 years.

The General Council of the Bar of the Province of Quebec met in Montreal on the 14th ult. All the members were present:—W. W. Robertson, Batonnier of the Montreal section; the Hon. J. G. Malhiot, Batonnier of the Three Rivers section; Joseph G. Bossé, Batonnier of the Quebec section; William White, Batonnier of the St. Francois section; and C. T. Suzor, of Quebec, the Secretary-Treasurer. W. W. Robertson, Esq., was elected Batonnier-General of the Province for the ensuing year, and C. T. Suzor, Esq., was re-elected Secretary-Treasurer. The bill now before the Legislature to amend the charter of the corporation was the chief subject of discussion, and after considering its more important features, the Council adjourned its session to meet in Quebec on the following Tuesday morning, on which day the bill was to come before a select committee of the House of Assembly.

DISRAELI.—In the general grief at the death of Lord Beaconsfield, lawyers will not forget that he entered upon the business of life as a lawyer. Like the rest of the early history of Mr. Disraeli, little is known with certainty of his career in the law, except that it was short. He is believed to have been articled to a solicitor in Old Jewry; but what was the name of his principal, and how he came to leave the law, is without even a tradition. His disciples in the legal profession may well have found internal evidence of an acquaintance with legal processes. Mr. Disraeli's statements of the law were always precise and singularly accurate; while he had a remarkable facility for taking in the effect of proposed legislation, however complicated. His appreciation of the legal bearings of political questions was sound; and his presence in the House of Commons at the time of the Bradlaugh incident would probably have saved the House from a ridiculous situation.—*London Law Journal*.