sel. In England no Queen's Counsel, can take a brief against the Crown except by license of the Crown, first obtained from the Crown, which, in England costs, it is said, about £9. In England no Queen's Counsel can accept a brief as junior counsel, but is compelled, by the etiquette of the profession, to confine himself to leading business. In England, a barrister, when he has attained a sufficient standing at the bar to warrant his giving up business as a junior, applies to the Lord Chancellor to be made a Queen's Counsel. The granting of the application, however, is in the discretion of the Lord Chancellor. There is, however, nothing *infra dig.* or unseemly on the part of the barrister in making such an application. It will be seen, therefore, that the mode of appointment, and the consequences of appointment of Queen's Counsel differ very much in Canada. In Ontario it has not been customary to require Queen's Counsel to be sworn, though why that preliminary to their exercising this office is dispensed with we do not know. Queen's Counsel hold briefs against the Crown in Ontario without obtaining any license for so doing; and they even take business as juniors, both in Chambers and in Court. If they apply to be appointed, it is too often not because their position at the bar entitles them to, and justifies them in claiming, the distinction, but principally because they or their friends think their services to the party machine merit the reward.

TRIALS IN CAMERA.

The case of *Malan* v. *Young*, an action to recover damages for alleged libel and slander by the head master of Sherborne school against an assistant master, was down for trial before Mr. Justice Denman and a special jury in the beginning of November last. Upon the case being called, Sir Charles Russell for the plaintiff, with the consent of Mr. Lockwood, Q.C., who represented the defendant, asked that the case might be heard *in camera*, upon the ground that a public trial would prejudicially affect the interests of third parties, who were not before the court. The learned judge at first doubted his power to make the order asked for, but after consulting some of his brethren on the Bench, he consented to hear the case in private, without a jury. The withdrawal under protest of "a barrister robed," who claimed the right to remain in court as one of the public, and as the father of boys who are being educated at Sherborne school, imparted a momentary dramatic effect to the prosaic, but by no means trivial, incident, and the hearing of the cause proceeded in private.

While the matter is still to some extent occupying public attention, it may be interesting and instructive to trace shortly the history of judicial practice in England in regard to the trial of actions *in camera*.

In 1860, a petition for declaration of the nullity of a marriage, reported as *H.* v. *C.*, in the first volume of Swabey & Tristram, at p. 606, came before Sir Cresswell Cresswell, as Judge Ordinary of the new Probate or Divorce Court. An application was made for a trial *in camera*, on the ground of the painful nature of the evidence to be adduced; but the Judge Ordinary, with the concur-