

But though 7,506 actions appear to have been commenced only 3,024 judgments appear to have been entered, and of these 2,427 were entered without trial, *i.e.*, the judgments were obtained by default or on motions for judgment, and only 597 after trial. In the County Courts 4,347 writs appear to have issued, of which nearly one-fourth were issued in Toronto. The total amount claimed was \$904,424.61. The total number of judgments entered in the County Courts was 2,404, of these 2,066 were entered without trial, and the remaining 228 after trial. By the former \$476,712.28 damages and \$39,362.43 costs were recovered, and by the latter \$28,800.08 damages and \$21,779.64 costs. We are unable to present similar statements of the amounts recovered in the High Court, as no returns are made to the Inspector from the Toronto offices.

During the year 1888 15,486 chattel mortgages were registered securing \$7,255,419.51.

On turning to the record of business done in the Surrogate Offices we find that the total amount of personal property devolving during the year 1888 was no less a sum than \$12,180,202.22, but we were somewhat surprised to find that the value of the realty devolving during the same period was only \$3,015,053.48. The total number of probates granted was 2,230, and of letters of administration 1,272. Dividing the aggregate values of the estates devolved between the numbers of estates to which probate or administration were granted would give an average value to each of \$4,331.

We cannot readily make a comparison between the statistics of 1888 and the year 1887, because in that year the totals were not added up in the schedule. Comparing them with 1886 the business appears to have steadily increased. The total number of writs of summons issued in the latter year from the High Court being 6,090, the amount for which they were indorsed being \$8,787,407, against 7,506 indorsed for nearly \$11,000,000. Further comparisons might be instituted, but it may suffice to say that all along the line the volume of business will be found to show a steady increase.

COMMENTS ON CURRENT ENGLISH DECISIONS.

We continue the Law Reports for August comprised in 23 Q.B.D., pp. 133-26; 14 P.D., pp. 85-130; 41 Chy.D., pp. 437-577, and 14 App. Case, pp. 105-336.

TRUSTEE—DEPRECIATED SECURITIES—APPLICATION BY TRUSTEE FOR ADVICE—COSTS.

In re Medland Eland v. Medland, 41 Chy.D. 476, was a summary application to North, J., by trustees for advice as to their duty regarding certain mortgage securities belonging to the trust estate, which had fallen in value so that the mortgage debt had come to exceed two-thirds of the value of the mortgaged property. Some only of the beneficiaries were parties to the application. North, J., was of opinion that it was not the absolute duty of the trustees at once to call in the mortgage debt, but that they have a discretion which they must exer-