hand, the Court of Appeal is glutted with business, and unless some arrangement is made to relieve it, any appeal to that Court will soon involve, of necessity, a very great delay before it can be heard. Under section 12 of the Judicature Act there is a power to constitute a second Division of the Court of Appeal, to be composed of two judges of the Court of Appeal, and two judges of the High Court. Whether an Appellate Court so constituted would be a satisfactory substitute for an appeal to a Divisional Court of the High Court, with the further right of an appeal thereupon to the Court of Appeal, is doubtful. The postponement of cases on the list of causes set down to be heard before the Divisional Court in order to suit the convenience of counsel, says a great deal for the complaisance of the bench ; at the same time it is a somewhat dilatory method of disposing of cases, and it may not be unreasonably asked, in the interest of the junior bar, who are eager and anxious for briefs, why so much consideration is shown to the leaders of the bar, especially as it prevents dissemination of business among the juniors, who would be only too glad of it.

THE RIGHTS OF ACCOMMODATION PARTIES TO BILLS AND NOTES INTER SE.

The principle of equity that co-sureties are liable to mutual contribution has been firmly established since the decision in the well known leading case of *Dering* v. *Earl of Winchelsea,* 1 Cox, 318. It has its origin not in contract, but in the plain dictates of natural law.

This doctrine applies whether the parties are bound in the same or different instruments, provided they are securities for the same principal and in the same engagement, even though they are ignorant of the mutual relation of co-suretyship: *Craythorne* v. *Swinburne*, 14 Ves. 163, 165. But a person may take himself entirely out of the principle, as where he becomes merely a collateral surety. " In the case of A. undertaking that if the principal does not pay, and if B., who has already become surety, does not pay, he, A., will pay, it seems per-