

The judge, obviously, did not intend to make a distinction based merely upon sex, but between charitable institutions and "bodies of a different character," for example, municipal councils or business corporations. In this light his remarks are perfectly just, for courts have always been reluctant to interfere with the domestic administration of benevolent institutions, or to subject their acts to the rules of strict technicality where no substantial grievance is complained of.

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The revenue of the Court of Appeal and High Court of Justice in England, according to a recent return, is not equal to the expenditure. For the year which ended March 31, the total receipts amounted to £489,649, while the expenses were £637,902. The salaries of the judges, including the salary of the Lord Chancellor, amount to £148,716, and the retiring annuities of judges and pensions to ex-Lord Chancellors, add an additional sum of £31,631. In England, however, the services of the best men are secured for the bench, apart from the consideration whether the institution is self-supporting.

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An instructive example of the way in which libels are punished in England is afforded by the recent case of the editor and proprietor of the *Spy*. They pleaded guilty to having maliciously written, printed and published in their journal defamatory libels concerning Mr. John Southam, a Manchester solicitor. The libels complained of were allegations against Southam that he had wilfully appropriated money left his mother for the benefit of his relatives. Since the committal there had been negotiations ending in the expressed willingness of the prosecutor to accept an apology from the defendants, who were further to pay costs, but the judge refused to allow such an arrangement. Mr. Spee, Q.C., addressing the court in mitigation of sentence, said the defendants desired to withdraw the libels as handsomely as they could. They