

for every day's default, and the defendants claimed that the proceedings were in the nature of criminal or penal proceedings, and therefore that they were privileged from examination for discovery, but the Court of Appeal (Lord Esher, M.R., and Smith, L.J.), however, determined that the proceedings were not criminal, and that as no penalty necessarily followed from the making of the order sought, but only as a consequence of the defendants disobeying it, and then only in the discretion of the Court, if it should be satisfied that disobedience was without reasonable excuse, that fact constituted no ground for relieving the defendants from making discovery.

POST OFFICE DIE FOR MAKING FICTITIOUS STAMP—POSSESSION "WITHOUT LAWFUL EXCUSE"—POST OFFICE PROTECTION ACT, 1884, (47 & 48 VICT., ch. 76) sec. 7 (c.)—(CR. CODE, sec. 435 (c).)

*Dickins v. Gill*, (1896) 2 Q.B. 310, was a prosecution under the Post Office Protection Act, 1884, sec. 7 (c.) (Cr. Code 435 (c).) against the defendant for having in his possession "without lawful excuse" a die for making a fictitious stamp. It appeared by the evidence that the defendant was the proprietor of a newspaper circulating among stamp collectors, and had caused a die to be made for him abroad, from which imitations of a current colonial postage stamp could be made. The only purpose for which he had actually used it was for making on an illustrated catalogue illustrations in black and white, and not in colors of the stamp in question. This catalogue was sold as part of his newspaper. On a question stated by a magistrate as to whether this evidence showed "a lawful excuse," Grantham and Collins, JJ., were unanimous that it did not.

PRACTICE—EXECUTION—MARRIED WOMAN—SEPARATE PROPERTY—EXAMINATION OF THIRD PARTY IN AID OF EXECUTION—ORD. XLII., R. 32—(ONT. RULE 928).

*Hood Barrs v. Heriot*, (1896) 2 Q.B. 338, is a case, judging from its frequent appearance in the reports, in which the plaintiff is bound to settle the law on the liability of married women as far as he possibly can. Having recovered judgment against the defendant (a married woman) in the form settled in *Scott*