

which have been held to amount to annexation. No very useful purpose would be served by so doing. Lord Blackburn in delivering the judgment of the court in the Exchequer Chamber in the case of *Holland v. Hodgson* (26 L. T. Rep. 709; L. Rep. 7 C. P. 328, at p. 335) gave some very striking examples. Blocks of stone placed on the top of one another so as to form a dry stone wall would become part of the land. Yet if these were deposited in a builder's yard and were, for the sake of convenience, placed one on top of another in the form of a wall, they would remain chattels. Then his Lordship gives another instance. An anchor of a large ship must be firmly fixed in the ground in order to bear the strain of the cable, yet no one could suppose that the anchor became part of the land, even though the shipowner happened to be the owner in fee of the land at the spot where the anchor was dropped. On the other hand, an anchor fixed in the soil for the purpose of bearing the strain of the chain of a suspension bridge would become part of the land. Again, the nailing of a carpet to the floor does not make the carpet part of the house.

It is the fact of annexation to the soil of a chattel by some person other than the absolute owner of the land that gives rise to the question of fixture or no fixture. This is a fundamental point which ought never to be lost sight of, when dealing with any point on the law of fixtures. Necessarily, there are innumerable degrees and methods of fixation. But without some degree of annexation there can be no question but that the chattel is no fixture. However paradoxical it may seem, the method and degree of fixation may be an important factor in deciding the question whether a chattel is a fixture. This arises from the fact that the intention of the party fixing the chattel is in truth the governing question in the whole matter. Speaking of this question whether a particular chattel was, or was not, a fixture, Lord Blackburn in *Holland v. Hodgson* (*sup.*, at p. 334) said: "It is a question which must depend on the circumstances of each case, and mainly on two circumstances, as indicating the intention viz., the degree of annexation and the object of the annexation. The effect of the cases, however, appears to be that this intention is one which must be gathered from the general circumstances