the plaintiff had been entitled in remainder. On the plaintiff's estate falling into possession this action was brought within the time limited by section 8. A Divisional Court, composed of Field and Manisty, JJ., refused to follow the ruling of Fry, J., in *Laird* v. *Briggs*, and held that a remainderman is not a person entitled in reversion within the meaning of section 8, and consequently that the plaintiff was barred by the statute, and that the defendants had acquired an indefeasible right to the easement in question.

CITING CASES.

IT is an easy matter to cite cases. It is not always an easy matter to cite them effectively. If we might be allowed to make a suggestion we should say that the most effective way to cite authorities is to abstain from citing any case which the citer has not himself read. Furthermore, we should say that to throw a mass of citations at a Court without regard to order, is not a good method. If counsel desire to have the cases he cites read and weighed by the Court, some discrimination is necessary in the selection of the cases to be cited. Generally speaking, when a late case is cited which collects and discusses previous authorities, it is useless and a waste of time to cite the earlier authorities which are so collected. unless counsel desire to make some point by so doing, as, for example, to induce the Court to reconsider the later case, or to distinguish it from the case in hand.

The great object of citing cases is to assist the Bench in coming to a right conclusion on the matter being argued; and, depend upon it, the judges very soon learn to appreciate at their proper value arguments marked by citations carefully and intelligently made, and those which are characterized by an undigested heap of cases from text-books or digests flung at the Court promiscuously.

We have sometimes heard counsel who were by no means inexperienced juniors, citing cases to the Court by the initial letters or abbreviations by which the reports are known, *e.g.*, "Drew." for "Drewry," and "D. M. & G." for "DeGex, McNaghten & Gordon." We need hardly say that counsel who thus cite cases inevitably create the impression that they have never looked at the case they thus cite.

We think no student will waste his time, if in his studentship he endeavours to make it a rule never to cite cases that he has not read; and to make it a rule never to cite cases merely for the purpose of multiplying authorities on the same point, unless there is some real reason for so doing. The advantage of this early training will soon be manifest when he enters into active practice on his own account. The gaining the ear and the confidence of the Court is what all counsel should aim at, and we know of no better means by which counsel may do this than by being known to the judges as one who never cites authorities unnecessarily, or which are not in point; and, above all, as one who never misstates the effect of a case that he does cite, or attempts to conceal any case from the attention of the Court which bears upon the case under consideration.

This brings us to another point, and that is how an advocate should cite cases adverse to the side for which he is arguing. Those who regard it to be the duty of the advocate to win his client's case by hook or by crook, honestly if he can, but any way to win it, will perhaps be inclined to think that an adverse decision should simply be ignored by him, unless brought to the attention of the Court by his opponent. We doubt very much, apart from any question of professional ethics, whether