directed to bring in a special verdict. This got rid of much of the evils of a general verdict, but it was not wholly satisfactory. Accordingly in 1874 an Act was passed, 37 Victoriae, c. 7, which by section 32 provided that except in actions of libel, slander, criminal conversation, seduction, malicious arrest, malicious prosecution and false imprisonment, the Judge instead of taking a general or special verdict, might direct the jury to answer any questions of fact stated to them for that purpose, and made it the duty of the jury to answer the questions and abstain from finding a verdict. Upon the answers to the questions the Judge enters the verdict. (The exceptional cases are now cut down to libel alone.)

Before 1895 civil juries were required to be unanimous (as criminal juries still are); but in that year by the new Judicature Act, 58 Victoriae, c. 12, s. 112 (3), it was declared sufficient if ten jurors agreed in the verdict or in the answer to the questions. The point was raised more than once but never decided whether the same ten must agree in the answers to all of the questions. This question was laid to rest by the Judicature of 1913, 3-4 George V, c. 19, s. 58 (3), which answered it authoritatively in the negative.

In the case of a special jury *(rara avis in terris, nigroque simillima cygno)*, unanimity is still required — I have seen two special juries in my thirty years' experience, and do not expect to see another. I do not know the slightest advantage they present, and it is not unlikely that that "institution" will die of inanition.

The jury system in the Supreme Court and the County Courts, I have now explained.

A Surrogate Court is found in each county or union of counties, presided over by a Judge who (in every instance but one) is also the Judge of the County Court. This Court