

or members of the grand jury commonly sat on the jury which tried the accused—*i.e.* that the offender could be tried by his accusers, or a jury consisting partly of his accusers, and that the right of challenge for cause, though it existed in capital cases, was not absolute. In 1340 a commission of oyer and terminer was issued to try Chief Justice Willoughby and other justices for acting in the exercise of their offices unfaithfully and deceitfully towards the king and his people, a precedent which might have been of some interest in the recent case of *Anderson v. Gorrie*. At the trial of Willoughby it was laid down by Mr. Justice Parning that in cases of indictment there should be upon the jury to try the accused both 'indictors' and others, and that in the interest of the king care should be taken to have indictors on the jury. But this statement of the law led to the enactment of 25 Edw. III., stat. 5, c. 3, which entitles the accused to challenge for cause any indictor (*i.e.* member of a grand jury or coroner's jury) who is put upon the inquest or petty jury. This Act is forgotten but unrepealed, and unaffected by the County Juries Act, 1825 (6 Geo. IV., c. 50), and it may be regarded as putting an end to any tendency to confuse the functions of the jury of accusation and jury of trial; but it does not absolutely disqualify a grand juror from sitting on the petty jury; nor would his presence invalidate the verdict (*Regina v. Edmunds*, 1 St. Tr. (N.S.) 785, at 883).—*Law Journal (London)*.

GENERAL NOTES.

WOMEN AS BARRISTERS.—A bill has been read a second time in the House of Representatives in New Zealand, admitting women to practise at the bar, and at the same time reducing examination fees to a minimum, and providing that examination papers shall be set in English only.

FOREIGN DIVORCE LAWS.—Nearly a year ago circulars were sent by Lord Rosebery to English representatives abroad asking that information might be supplied to the House of Commons respecting the laws of divorce in the most important of our colonies, as well as in foreign countries. Some very curious answers have been received, and an entertaining Blue-book, just issued, is the result. In America very curious differences exist in different States; 'it is extremely difficult to give even an outline of the marriage laws prevailing in this country,' remarks our