

A note on the method of certifying judgments in Ontario for use in foreign Courts, may perhaps be of interest to members of the profession from the absence in the rules of any provision regulating the practice. In the case of judgments entered in Toronto, the exemplification certified as correct by the Clerk of Records and Writs, and the seal of the Court, is presented to the Chancellor as President of the High Court, who verifies the seal and the signature of the Clerk of Records and Writs by his own certificate, according to a printed form provided by the central office. The whole is then authenticated by a certificate of the Provincial Secretary, which can be obtained on payment of two dollars. Where the judgment is entered in a local office neither the Clerk of Records and Writs, nor the Chancellor, can certify to the signature of the local officer. To overcome this difficulty it has been the practice in some cases to obtain from the Inspector of Legal Offices a certificate verifying the signature of the local officer, upon which the Chancellor has issued his certificate in the same form as that used with judgments entered in Toronto. The Provincial Secretary's certificate then follows as a matter of course.

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A correspondent draws our attention to a point which we had overlooked, viz., that in the case *Johnston v. Catholic Mutual*, referred to in our last issue, it is stated in the report at p. 93 that after the argument of the appeal and before judgment the legatees and next of kin of Patrick O'Dea were, by order of the court, added as parties, but whether as plaintiffs or defendants is not stated; as their rights were clearly antagonistic to those of the original plaintiff, we presume they must have been added as defendants. It does not appear by the report, however, that they appeared, or set up any counter claim. The case, even in this view of the matter, is quite unique, and is an instance of the possibilities of procedure under the Judicature Act. The action wholly failed as regarded the plaintiff and original defendant (the executor), and yet a judgment was pronounced in favor of defendants, brought in at the eleventh hour, and who, so far as appears,