America they manage better. A man who has bought a business is, in some States, only allowed to describe himself as successor. In others he may use the name of his predecessor, but only with his written consent.—*Ib.*

"No attorney," says Abbott, C.J. (*Montriou* v. *Jeffreys*, 2 C. & P. 113), "is bound to know all the law. God forbid that it should be imagined that an attorney, or a counsel, or even a judge, is bound to know all the law, or that an attorney is to lose his fair recompense on account of an error, being such an error as a cautious man might fall into." But a solicitor is bound to know some things, and one of them is that the County Court is, generally speaking, a cheaper forum than the High Court. When a local board, for instance, wants to recover £34 from a frontager, and is advised to sue in the Lancaster Palatine Court and loses and has to pay the defendant £240 in costs, it is naturally grieved at having to pay its solicitor another £200, and may be excused for charging negligence (*Barker* v. *Fleetwood Improvement Commissioners*, 62 L.T.R. 831). "The cases," says Charles, J., "seem to me to establish that where a solicitor recommends his client to sue in a Court that has jurisdiction over the matter in question, but where the client may incur a penalty as to costs, even if successful, the solicitor may be held to have been guilty of negligence if he has not advised his client as to the risk he runs of incurring the penalty;" but if there happens to be no penalty (as in the Lancaster Palatine Court) for bringing an action in a more expensive Court when he might have brought it in a cheaper, the client it seems has no remedy. Why? If he loses, as in *Barker* v. *Fleetwood Improvement Commissioners*, he has to pay perhaps ten times the amount in costs, because his solicitor has taken him into the more expensive Court. Of course a solicitor may have many proper reasons for doing so: then there is no negligence, but the criterion of penalty or not seems, from the client's point of view, unsatisfactory.—*Ib.*

LORD CAMPBELL much preferred judge-made law to the "crude enactments of the legislature." Lord Coleridge, on the other hand, like Lord Westbury, thinks statute law would be very tolerable but for the cases: so various, as Herodotus would say, are the opinions of men even on the commonest matters. Strange to say, this dictum of the Lord Chief Justice was called forth by the much-abused Bills of Sale Acts. Anyhow we may be thankful that in *Read* v. *Joannon* (25 Q.B.D. 300) the trumpet gave no uncertain sound, and that debentures have not been drawn into the terrible vortex of the Bills of Sale Acts. Whether a "covering deed," including chattels, must still be registered as a bill of sale is not quite clear (see *Ross* v. *Army and Navy Hotel*, 34 Ch. Div. 43), but probably it need not. *Re Pyle Works* (44 Ch. Div. 534) affirms the right of a company to charge its uncalled capital. Uncalled capital is part of a company's property, and there is nothing in the Companies' Act, or in principle, to prevent a company, if its articles authorise it, charging it like any other property. The sections and cases disallowing set-off on winding up were cited in argument as if they appropriated uncalled capital to creditors. The fallacy is transparent. On a winding up they