question arose out of a defective roof through which water found its way into a flat. It is curious that *Dobson* v. *Horsley* (*supra*) does not seem to have been referred to, but the learned judge took a decided view as to the extent of the principle established in *Miller* v. *Hancock*, and he followed it in preference to the limitations imposed by later cases. "I have," he said, "carefully considered the language of *Miller* v. *Hancock*, and have come to the conclusion that, as reported, all the judges imposed an absolute duty to repair on the landlord. I think if the Court, and particularly Bowen, L.J., had meant merely to impose a liability for traps on the lines of *Indermaur* v. *Dames* (L.R. 2 C.P. 311), they were quite capable of expressing it in clear words, and would have done so."

But in the present case of *Groves* v. *Western Mansions* (*supra*) the Divisional Court (Lush and Bailhache, JJ.) had *Dobson* v. *Horsley* (*supra*) before them, and they held—though Bailhache, J., with hesitation—that the trap theory now holds the field. It may be so, but we have on numerous occasions expressed the view that *Miller* v. *Hancock* is the better authority, and, since leave to appeal has been given, we hope the matter may now be reconsidered, and the wide principle which the Court of Appeal first laid down confirmed.—*Solicitors' Journal.*

TERMINOLOGY OF COMPOUND NAMES.

A correspondent in a note published in our last volume (page 430) took exception to the expression "Lords Justices," which was used in 36 O.L.R. p. 205, thinking that grammar requires the expression "Lord Justices." Another correspondent now writes us taking strong ground against this criticism. He says that when the Court of Appeal in Chancery matters was instituted by 13 & 14 Vict. c. 83, it was expressly provided in sec. 3 that the Judges to be appointed should be called "Lords Justices," and they always were so called. Also that when the Judicature Act was passed in 1873 (36 & 37 Vict. c. 66), sec. 6 provided that the