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The English law with reference to the guardianship of infants, which is depicted in so unfavorable an aspect by William Black in one of his recent romances (*Sabina Zembra*), was amended in 1886, 49 & 50 Vict., c. 27. An interesting case, *In re Witten*, has occurred, illustrating the benefit of the increased power which the Court now possesses to deprive the father of the custody of an infant child, and to deliver the child to its mother. The father, a man of 53 years of age, was accused of having formed an improper connection with a young lady of six-and-twenty, who was under his tuition in medicine. He denied any impropriety, pretending that he had adopted the young lady in question, and that he never acted towards her in any other way than a father ought to act towards his daughter. The lady, however, admitted in an affidavit that her character had been destroyed by the association, and it also appeared that the defendant had lost a position of trust in consequence of being unable to meet the charge of impropriety. The wife, moreover, for the same reason had commenced proceedings for a judicial separation, and she had been informed that her husband intended soon to go to Morocco with the young lady and the child (a boy of ten years of age), and to live there permanently. In these circumstances, Mr. Justice Kay said he had no hesitation in granting the mother's application for the custody of the child. His lordship hoped that the father's relations with the young lady were innocent, though it was rather difficult to believe it. But if the relations were as innocent as possible, such conduct on the part of a married man was inexcusable. The order was made that the boy be delivered into the custody of the mother, and the only concession made was that he might reside with his father for a fortnight in the summer and a week in the winter holidays, in any house in which the lady was not, and to which she did not come. If she attempted to associate with the boy in any shape or way, his lordship would at once interfere. The *Law Times* doubts whether the application would have been successful without the legislation of 1886.

Another case relating to the custody of the father, *In re Coram*, has occurred in New Brunswick. A father, being in poor circumstances, left his infant daughter, then aged seven years, with her uncle and aunt upon the understanding that she should be considered as their child, and that they should support and educate her as such. She remained with her uncle and aunt until she was nearly fifteen years of age, and was educated by them, the father contributing nothing toward her support. During this time she became much attached to them, and was unwilling to leave them. The Supreme Court were divided on the right of the father to obtain the custody of his child. The majority of the Court (Allen, C.J., Wetmore, King and Tuck, JJ.,) held that the father had the legal right to resume the custody of the minor, notwithstanding his agreement, even though his object was that she should assist in the work of his house, and thereby her duties would be more laborious, and her mode of living less easy and comfortable than she had been accustomed to in her uncle's house—there being no imputation against her father's character, or that she would not be properly cared for in his house. It was also held that the fact of her having been brought up by her uncle as a Presbyterian, and that her father was a Methodist, was no ground for refusing the father's application. The dissentient judges (Palmer and Fraser, JJ.) were of opinion that in applications of this kind, the principal thing to be looked at was the welfare of the child; that it would not be for the interest of the child that the father should exercise his right of custody and force her into a different position in life from that which her education and the habits she had acquired had led her to believe she would occupy; and that, so far as he could, her father had emancipated her from her duty to submit to his control, and therefore his application ought not to be granted.