reforms of this kind appears to be that the urgent need for them is not sufficiently appreciated either by the general public or leading statesmen.

The need for reform is, however, very urgent. It ought not to be possible that on the same point of law—apart from statute law—two courts in the Empire should arrive at diametrically opposite decisions, and that each of these courts should be right. Instances of this may not be very frequent—if they were, no doubt a remedy would at once be found—but their occurrence should be impossible. At present these contradictory decisions do occur sufficiently often to constitute a juridical scandal. In all branches of law, from mercantile law to constitutional, cases can be cited from the reports in which contradictory answers to the same question have been given by courts of the same Sovereign. The larger class of cases in which these conflicts occur consists of cases in which the English courts (including the House of Lords) differ from the oversea courts (including the Privy Council). A smaller class consists of cases in which the Privy Council differs from oversea courts.

That there should occasionally be divergence in the decisions of courts of co-ordinate jurisdiction is not remarkable, and it would not, therefore, be surprising to find the courts in England declining to be bound by oversea decisions. But that the courts in England (below the House of Lords) should not be bound by decisions of the Privy Council, the final appellate court for the oversea courts, is anomalous and inconvenient. The oversea courts are themselves bound by decisions of the Privy Council, and the result of the latter not being binding on the English courts is that one rule of law may prevail oversea and another in the United Kingdom. The inconvenience (though not the anomaly) is equally great in the case of the House of Lords itself and the Judicial Committee coming to different conclusions on the same point of law. This anomaly and inconvenience would, of course, at once cease to exist if both English and oversea courts had as their common appeal court of final resort such a tribunal as could be set up by amalgamating the House of Lords and Privy Council judicial bodies. In illustration of the conflict between English and oversea