

L. R., 5 S. C. 262), that the transfer of the risk from one company to the other having been made by Kavanagh in good faith, before the fire occurred, and in accordance with the custom of insurance brokers in Montreal, he could not be held liable. This decision was unanimously affirmed by the Court of Queen's Bench (Baby, Bossé, JJ., Davidson and Cimon, JJ. *ad hoc*), and after a very full argument before the Judicial Committee the appeal has been dismissed.

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The vacancy in the English Queen's Bench Division caused by the promotion of Mr. Justice A. L. Smith to the Court of Appeal (see p. 193), has been filled by the appointment of Mr. Gainsford Bruce, Q.C., who is chiefly known by his labors in the department of legal literature and law reporting. The *London Law Journal* says:—"The careers of other law reporters who have been raised to the bench, Lord Campbell, for example, and Lord Blackburn, whose promotion was so vehemently attacked, as well as the three ex-reporters who are now on the bench, have amply justified their elevation. Mr. Bruce never, we believe, enjoyed a very large practice; but neither did those great judges Lord Blackburn and Lord Justice James."

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By chapter 401, A. D. 1890, the State of New York made it a criminal offence for an agent of a life insurance company to pay a rebate as an inducement to insure in his company. The N. Y. Court of Appeals in *Conger v. Treadwell*, March 22, 1892, held that this is not unconstitutional as an abridgment of the natural rights and personal liberty of such agent in the conduct of his business. Life insurance companies (observed Haight, J.) perform very important functions in modern society. "They operate in all parts of the State, and a very large number of people are interested in them. They are resorted to for the purpose of making provision for families and dependents after the death of the insured, and for that pur-