

to 'entrap a person into liability for the publication of a libellous letter by inducing him to permit others to read it. It was shown that the person defamed had heard of the existence of such letter, and sent agents to obtain sight of it. This they accomplished by concealing their relations to him and pretending that he had treated them badly. The Court charged the jury, that if the plaintiff invited and procured the publication of the letter for the purpose of making it the foundation of an action, it would be most unjust that the procurer of the alleged wrongful act should be permitted to profit by it unless there had been a previous publication of the letter by the defendant. This, although undoubtedly correct and in harmony with the general doctrine as to the effect of instigation to crime as a defence to its prosecution, seems to be a novel point in the law of libel.—*Central Law Journal*.

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The Astute Married Woman.

We have long been familiar with the married woman's capacity for successfully baffling her creditors, and when she runs up bills for smart gowns or diamonds with charming irresponsibility, we can half forgive the feminine foible; but business is business, and when a married woman takes to carrying on a trade separately from her husband, she really ought to be prepared to meet the trader's liabilities or face the consequences. So at least one might think; but the enterprising married woman in *In re Dagnall* saw a third alternative—dropping her business; and having done that, she said, "Now I am not a married woman carrying on business sep-

arately from my husband" within the meaning of section 1 (5) of the Married Women's Property Act, 1882. I did carry it on, and I contracted debts which are still unpaid, but I don't carry it on now, and I can't be made a bankrupt." It was a bold stroke, and for the moment it quite nonplussed a Divisional Court in Bankruptcy, because sections entailing bankruptcy disabilities have to be construed strictly. The Court in the end outmanœuvred the lady. "True," it said, "you have ceased to carry on business; but as long as any debts incurred by you in carrying on the business are unpaid you must be treated as still carrying on business. Checkmate!" An artificial doctrine, no doubt, this; perhaps a legal fiction; but technicality may be played off against technicality. The difficulty was that in two cases the Court of Appeal had held that a debtor was not still carrying on business because debts incurred in it were unpaid. But this was under the Bankruptcy Act, 1869; under the Act of 1849 it was otherwise.—*The Law Journal (Eng.)*.

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The Lawyers Lead.

The three nominees for Governor of this state are lawyers. This is not strange or exceptional. We do not remember that West Virginia has ever had a Governor who was not a lawyer. The legal profession is the one practical school that fits the citizen for public station. Without the education and training it gives, a man in the office of Governor would find himself at sea, timid and without self-reliance, liable to blunder, appointed to lead without the qualifications for leadership.