prove a man's style. To the official shorthand-writer, therefore, Sir Richard Webster has proved one of the fastest, as well as one of the most difficult speakers heard at the Parnell Commission Court. Sir Henry James is as voluble a speaker as the Attorney-General—he is possibly even more voluble—but then his elocution is remarkably clear and distinct."—*The Green Bag.*

SUPREME COURT OF THE UNITED STATES.—It is likely that there will be several changes in the personnel of the Supreme Court within the next two or three years. Justice Field is seventy-four years of age, while Justice Bradley, his junior in point of service, is three years his senior in age. Either could have retired on full salary for life. Two years hence the like right will be open to Justice Blatchford, who, at that time, will be ten years a member of the court, and seventy-two years of age. The probability therefore is, that the Supreme Court will contain more new faces within the next few years than it gained in any other equal period in the present decade. There seems to be something in service on that bench which is favorable to longevity. Few of its members have reached it until attaining middle life, yet the instances in which service has been extended to more than a quarter of a century are not rare. John Marshall, of Virginia, and Joseph Story, of Massachusetts, exceeded that limit nearly ten years, while the service of John McLean, of Ohio, and James M. Wayne, of Georgia, continued thirty-two years; that of Bushrod Washington, of Virginia, thirty-one years; of William Johnson, of South Carolina, thirty years; of Roger B. Taney, of Maryland, and of John Catron, of Tennessee, twenty-eight years; and of Samuel Nelson, of New York, twenty-seven years. Marshall heads the list in this respect, his service extending over thirty-four years.—*Central Law Journal.*

CAN A MURDERER ACQUIRE A TITLE BY HIS CRIME?—A decision which brings about a just result, but upon wrong grounds, is commonly mischievous as a precedent. A pertinent illustration of such mischief is to be found in *Shellenberger* v. *Ransom* (Nebraska, 1891), 47 N.W.R. 700, in which case *Riggs* v. *Palmer*, 115 N.Y. 506, was treated as a controlling authority. In the New York case a young man murdered his grandfather, in order to prevent a revocation of the latter's will, in which he, the grandson, was the principal beneficiary. Being convicted of the crime and sentenced to imprisonment for a term of years, he still claimed the property as devisee. The majority of the court, however, decided in favor of the testator's heirs, treating the will as revoked by the crime of the devisee. Two judges, dissenting, were of opinion that the will was not revoked, and that the grandson should keep the property in spite of his crime.

It seems possible to agree with the dissenting judges, that there was no revocation of the will, and also to agree with the majority of the court, that the grandson could not retain the property. By a familiar equitable principle, one who acquires a title by fraud or other unconscionable conduct is not allowed to keep it for himself, but is treated as a constructive trustee for the benefit of the victim of his fraud, or, if he be dead, for his representatives. Accordingly, full effect might have been given to the will, and yet the devisee, as a constructive