1872. They lived together in England until January, 1873, after which they went to America. In February, 1879, she instituted proceedings in the United States for a decree dissolving the marriage, and was successful. Afterwards she returned to England, and instituted proceedings here for the purpose of having her marriage declared null and void. Mr. H. B. Deane appeared for her, and when the case came before Mr. Justice Butt, he raised the question of jurisdiction, contending that if the marriage was absolutely dissolved by the decree of the United States, then there existed no marriage between the parties upon which this court could be called to pronounce any opinion, his lordship directing that the case be argued by the Queen's Proctor. The arguments were heard before Sir James Hannen, who reserved his judgment. Sir James Hannen now said he was of opinion that this court had no jurisdiction, in the sense that the marriage was duly and absolutely dissolved by the decree in the United States court, and therefore there was no marriage existing between the parties to be dissolved and declared null and void by this court. The husband was domiciled in the United States, and after his marriage the petitioner took up her permanent abode in that country, and completely acquired a domicile there. Her suit, consequently, would be dismissed.—*Keble's Gazette* (Eng.).

SUPPLY OF INTOXICATING LIQUORS TO CLUBS.—The decision of Mr. Justice Stephen and Mr. Justice Charles in *Evans* v. *Hemingway*, some time ago, is an illustration of the application of the law of licensing to clubs. On proof of the supply of intoxicating liquors, and the passing of money, it lay on the defendant to show that the place was a club. It has always been assumed by the Inland Revenue and in the courts that proprietary clubs are equally exempt with members' clubs. The exemption of members' clubs is clear, because the liquor is the member's own, and he contributes towards funds of his club to the extent of what he orders, and does not buy the liquor. The statute requires that there shall be a sale. There is no sale in members' clubs; but is there a sale upon which a conviction may be obtained in a proprietor's club? The better opinion appears to be that there is not, because clubs like Boodle's and White's could not take out a license—at all events not a spirit license—if they wished, not being intended to be kept as places of public resort. In this state of the law the justices in the case in question may well have been puzzled to know what points they ought to find as a basis for the decision of the Queen's Bench. Eventually, in answer to a somewhat leading question of the court, they found that the arrangements representing the establishment as a club was a pretence. If by this they meant that the place was not a club at all, there was no more to be said, but they went on to say that, "in fact the manager was the proprietor of the establishment," which may mean merely that it was a proprietary club. The court evidently took the former view of the finding, and the case cannot be considered to decide that all proprietary clubs must take out a license.—*Law Journal* (Eng.).