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WE would call the attention of our readers to the full report to be found in the *Albany Law Journal*, vol. 44, p. 86, of a case defining the law of easements in regard to companies utilizing electricity and operating in the public streets, which we have noted *post* p. 479.

AMONG the Acts passed at the last session of the British Parliament was that known as the Slander of Women Bill, which enacts that an imputation on a woman's chastity is actionable without proof of special damage. This is one of the numerous instances in which our legislatures are in advance of the old land's. The matter of this bill became law with us by c. 14 of 52 Vict. (Ont.). Our Act is a little wider, and provides for the giving of security for costs and for examination of parties immediately after the delivery of the statement of claim, provisions which do not occur in the English Act.

## DOWER IN MORTGAGED ESTATES.

In the late case of *Pratt v. Bunnell*, 21 Ont. 1, Street, J., in delivering the judgment of the Divisional Court, says that the decision arrived at is opposed to the view taken by Patterson, J.A., in *Martindale v. Clarkson*, 6 A.R. 1; by the Chancellor in *Re Croskery*, 16 Ont. 207; and by Ferguson, J., in *Re Hague*, 14 Ont. 660. We are, however, somewhat inclined to doubt whether there is really any such judicial conflict of opinion.

In *Pratt v. Bunnell* a mortgage had been given for purchase money, and the wife of the mortgagor had joined in the mortgage to bar her dower; and the question the court had to decide was whether, after payment of the mortgage debt, the wife's dower was to be calculated on one-third of the whole value of the land, or only on one-third of the surplus remaining after payment of the mortgage.

The Court came to the conclusion that the wife was only dowable in that case out of the surplus; which conclusion, if confined to the case of mortgages for purchase money, we believe to be a perfectly correct exposition of the statute; but if it be intended to apply that rule to other cases than mortgages for purchase money, we think it open to doubt, and in that case it certainly would be opposed to the previous decisions above referred to. The *obiter dictum* of Patterson, J.A., in *Martindale v. Clarkson*, referred to by Street, J., does not appear to be maintainable as a general proposition applicable to all cases. Speaking of the new right conferred on dowresses by the Act of 1879, he says, "To such dower the Legislature applies the rule adopted by the Court of Chancery in *Robertson v.*