of procedure will in due course of time become formulated by the decisions of the Judges. Meanwhile there are some probabilities as to the effect of the Act in question upon some branches of the law, which we propose briefly to consider.

And first, as to demurrers in Equity for multifariousness, the practice will be somewhat altered. This objection is one which must be taken by demurrer; otherwise, if passed over, so that the cause comes to a hearing, the Court will administer appropriate relief. The objection for multifariousness generally is open to the defendant, when upon the record distinct matters are united, which it would be inconvenient and undesirable for the Court to try at the same time. In *Loucks* v. *Loucks*, 12 Gr. 343, Spragge, V. C. remarked (adopting the language of Lord Cottenham)—"To lay down any rule applicable universally, or to say what constitutes multifariousness as an abstract proposition, is, upon the authorities, utterly impossible." But he goes on to say, "It is a just ground of complaint with the demurring defendants, that distinct matters, wholly unconnected, in which they have no interest, are united in the same record with the case they have to answer." Now, according to the former practice, the objection would not be good on demurrer if the multifarious matters united were such as could only be cognizable at law, and in respect of which there was not jurisdiction in Equity. Thus it is laid down in Story's Equity Pleadings, section 283, referring to *Knye* v. *Moore*, 1 Sim. & Stu., 61. "If one of the distinct subject matters be clearly without the jurisdiction of a Court of Equity for redress, it seems that the Court will treat the bill as if it were single, and proceed with the other matter, over which it has jurisdiction, as if it constituted the sole object of the bill."

But the effect of the 32nd section of the Administration of Justice Act, giving Equity jurisdiction in Common Law matters, will alter the law in this respect, so that the demurrer for multifariousness in such a case as *Knye* v. *Moore* (*supra*), would be probably upheld.

Again, a very important advance in the administration of the law was made in this Province by Strong, V. C., when he decided in *Longeway* v *Mitchell*, 17 Gr. 190, that the beneficial provisions of the statute 13 Eliz. cap. 5, were open to all creditors. Before this decision, the rule was to refuse relief to a creditor seeking to avoid a fraudulent conveyance made by his debtor, unless the person seeking relief had obtained a judgment and execution at law. But, as the Vice Chancellor observed, "if a simple creditor could not maintain such a bill, he might be entirely defeated by a conveyance by the fraudulent grantee to a *bona fide* purchaser, whilst the action at law, in which he seeks to recover his judgment, is actually in progress." Now under the provisions of the same 32nd section it seems to us that a creditor seeking to impeach a fraudulent conveyance, could proceed concurrently, and by one and the same suit in equity, to establish his right as a creditor by the decree of the Court, (which would be equivalent to a judgment at law,) and also to have it declared, in a proper case, that the conveyance impeached was fraudulent and void as against his claim. In cases such as *Longeway* v. *Mitchell*, the Court did not heretofore order the land to be sold for the satisfaction of the creditor, because not having his execution in the Sheriff's hands, the Court would not expedite the sale of the lands. Yet we think under the new Act, this relief by way of sale of lands could be worked out in such a suit by an ordinary creditor, whose rights as a creditor are established by a decree for the payment of the debt.