celebrated granter of injunctions, in the name of the people of the State of New York, "by the grace of God free and independent," having been disrobed and disbarred, has gone into the tobacco business, where he can more safely indulge his propensity of rendering a *quid pro quo*.

The Court of Appeal has given judgment in the *Goodhue Will Case* in favor of Mr. Becher's appeal from the order of the Court of Chancery. Our readers will remember that on 16th January, 1872, the judges were divided in opinion, (see 8 C. L. J. N. S. 38), and the case was consequently re-argued. The decision just given did not turn upon the power of the Legislature to pass the Act, but upon its construction. It is rumoured that an explanatory or amending act may be applied for this session by the petitioners for the former Act. But public opinion is strongly opposed to such objectionable legislation as this, and we have no fear that any such attempt will prove successful. The Premier at least is not likely to give it countenance, holding views opposed to the propriety of Legislative interference in this case.

In the Supreme Court of Pennsylvania Mr. Justice Agnew lately delivered the opinion of the Court upon a review of the old English statutes relating to costs which appear to be in force in that State to the effect that a judgment for the defendant upon an issue of *nul tiel record*, entitles the successful party to his costs. *Steele* v. *Linebergers: Pittsburgh Legal Journal, Dec.* At the close of his judgment he makes the following observations, which lose none of their point when read as if levelled at the state of practice in Ontario on the vital subject of costs:

"From the examination I have been under the necessity of giving to this case I have been led to the conclusion that an act of assembly to consolidate and simplify the whole law upon the subject of costs in different actions and legal proceedings is much needed, and if some gentleman of the bar, of sufficient practical experience, would prepare such an act for consideration and adoption by the Legislature, it would confer a great service on the profession, the courts and the public."

The Solicitor-General of England, Sir George Jessel, made the following remarks upon the question of law reform, in addressing his constituents at Dover:

To shew them that he really was in favor of law reform, he would tell them that he believed that the only law reform that could be effectual was the simplification of the usages not suited to the present age. As regarded the form of procedure, let them be able to transfer land cheaply and economically, which would be done by a proper Land Transfer Bill. The law of mortgage should be simplified; the law as to succession of land should be exactly the same as the succession of personal property. He would blot out the laws which prevented a woman after marriage enjoying the benefit of her landed property just as before, unless she chose to settle it on her husband or any one else. He would also alter the law of limitations."

We copy from the English *Law Journal*, which seems to regard Sir George Jessel as a true law reformer, in opposition to others whom it calls law revolutionists.

The complications of modern society are now occasioning no small trouble in legal circles, in view of the possible and actual *status* of the softer sex. Take the case of a woman fully divorced. What is her proper "addition" in law? Is it "spinster"? Take the still more puzzling case of a woman not fully divorced, who has only a decree *nisi* for the dissolution of her marriage. How is she to be styled? In the Nisi Prius case of *Fletcher* v. *Krell*, the point was raised as to the effect of the word "spinster," if used as descriptive of a woman in a contract. The defendant maintained that it was in effect a warranty of her condition, and that consequently the plaintiff, who had entered his employ-