

jurisdiction of the Circuit Court. It was held, on contestation of declaration of a garnishee, in a case before the Circuit Court, that that Court has jurisdiction to pronounce upon the validity of a deed invoked by the garnishee to prove title to goods in his hands, though the consideration mentioned in the deed exceed \$200.

In *Turnbull v. Travellers' Insurance Co.*, Court of Review, Montreal, Nov. 30, 1892, Mr. Justice Doherty, delivering the judgment of the Court, decided an important point as to non-suits in our practice. It was held that the judge presiding at a jury trial has no power to non-suit a plaintiff save in the two cases provided for by Articles 394 and 395, C. C. P., that is, either where the plaintiff does not appear at the time and place fixed for the trial, or where, having so appeared, he, at any time during the trial and before verdict, withdraws from Court and abandons his suit,—the effect of such non-suit being in either case to dismiss the plaintiff's action, but permit his beginning anew. Any variation of these rules which may exist in modern English practice cannot affect our procedure which is based upon the system as it existed in England at the time of its introduction into this country.

The office of Chief Justice of the Supreme Court of Canada, vacated by the death of the late Chief Justice Ritchie, has been filled by the appointment, on the 13th instant, of Mr. Justice Strong, a puisne judge of the Court. Mr. Justice Strong has been a member of the Court since it was constituted, and was, at the time of appointment, the senior justice. Mr. Justice Strong's place, at date of writing, has not been filled.

Mr. T. C. deLorimier, Q.C., is the third of the elder members of the Montreal Bar who have passed away within a brief period. Mr. deLorimier, who was in his fifty-sixth year, was admitted in 1861, and practised for