

built on, and further, that while the construction of the wall was proceeding, appellant notified respondent that he was encroaching. Subsequently appellant resorted to an action *en bornage*, and the encroachment was established. The Court of Appeal considered that the value of the land was not so insignificant as to justify the application of the maxim "de minimis non curat lex." The action for demolition was therefore maintained.

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In the case of *Plummer v. Gillespie*, referred to, *ante*, p. 2, the Court of Appeal (Feb. 24) unanimously affirmed the judgment of Mr. Justice Archibald, since reported in Q. R., 10 S. C. 243. The underlying principle of the decision seems to be that services volunteered by strangers or outsiders do not give them a legal title to remuneration against the party to whom the services are rendered, where there is no evidence whatever that the latter requested or recognized the service in any way, or was even aware that it was rendered; and the alleged usage to the contrary, in the case of real estate agents, it was held, had not been established.

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The Quebec Statutes, 60 Victoria, have been issued, and contain some matters of special interest. The draft code of procedure prepared by the commission charged under 57 Vict., ch. 9, with the revision of the Code of Procedure, has been finally adopted, but the provisions respecting the Code of Procedure passed during the last session have to be embodied, and when the roll is completed and deposited the Code is to be brought into force by proclamation. It is to be regretted that these amendments could not have been incorporated before the end of the session, and the whole enacted as one statute, as difficulties may possibly arise with respect to the changes made by the commission after the draft was approved by the legislature. The changes made in the Code of Pro-