

of themselves, that they go on repeating like a parrot. *Dicta* should never be put into a head-note. It is bad enough to put them into the opinions. No "seemle" or "it seems" for us, if you please. In our multitude of decisions and modern theory of pleadings we have outlived the old-fashioned "scientific" style of reporting, which gave a statement of the pleadings; but there are a few reporters who still cling to it, and are years behind their Courts. We must say here that the worst statements are not infrequently those made by the Judges, who are in the attitude of a witness under cross-examination, who cannot answer a question directly, but must fortify himself as he goes along, lest his counsel shall not take care of him. Their head-notes, too, are never the best. We admire the discretion of the Indiana Judges, who refuse to obey a statute requiring them to make head-notes. One thing more: no Judge should ever interfere with a reporter's head-notes. If he is not sufficient for his office, turn him out and get one who is. But Judges never touch a head-note but to disfigure it, except in a few cases where it is already so bad that human ingenuity cannot make it worse. We say this from personal acquaintance with the proof-reading of Judges. They may tinker their opinions as they please, but they never should touch our head-notes or catch-lines. If they persisted we would discharge them.—*Albany Law Journal*.

LITHOGRAPHED SIGNATURES.—What a vast amount of trouble a few shillings can raise! From the County Court to the Court of Appeal has a solicitor fought for his contention (value 4s.) that his name lithographed on the particulars is sufficient signature to satisfy the County Court Rules. The Master of the Rolls said: "The point seems to me so contemptible that I can hardly bring my mind to consider it." But it turned out that, contemptible as the point was, there was enough consideration left in it to divide the opinion of the Court, and Lord Justice Fry, having stooped to the point, gave an opinion directly contrary to that of Lord Esher. Both judges thought it a subject upon which no two men could differ, and yet they differed. The Master of the Rolls had no doubt that such a form was perfectly good; and he characteristically summed up the opposite contention by saying: "Their argument comes to this, that it is not a signature because it is not a signature." On the other hand, Lord Justice Fry had just as little doubt that as a signature the lithographed form was bad. Unfortunately, Lord Justice Bowen was not present to settle the dispute. After the judgments there arose a doubt, and another diverting disagreement between their lordships, as to the effect of the judgments of the Courts. If the opinion of the Master of the Rolls, as the senior judge, prevailed, as is the case in the Divisional Courts, then his lordship's judgment would supersede those of no less than three judges of the High Court, including the Lord Chief Justice. Whereas, if Lord Justice Fry's judgment was to be accepted as the result of the appeal, being the same as that in the Divisional Court, his lordship's judgment would override that of a senior Judge in his own Court. Eventually the point was left to be inquired into, which, in the face of the incessant and unyielding difference of opinion throughout the case, sounded like an intimation that their lordships were "going to have it outside."—*Pump Court*.