This article does not argue for any general increases in the charges which are made. It is only a plea for the simplification of the tariff and the introduction into offices of methods which, because they are simple, straightforward and exact, will more likely ensure a fair distribution amongst all clients of the expense of the work done for each and at the same time, a fair and liberal return to the professional man, which will enable him better to live up to and support the dignity and importance of his calling. If any general reforms such as are outlined could be introduced and a tariff drawn up which would appeal to and be adopted by the profession generally, much of the present temptation to undercharge, or to win clients from other solicitors by reducing fees to below a proper standard of living for a professional man, would be obviated.

SHIRLEY DENISON.

PROOF OF DANGEROUS TENDENCY BY EVIDENCE OF PRIOR EFFECT.

The dissenting opinion in a recent New York case illustrates a reactionary tendency which has already assumed considerable proportions. The majority held that evidence of a prior accident in a passageway through an elevator shaft was admissible, to indicate the dangerous character of the place. Two justices maintained that, since it was not shewn that the defendant knew of the former accident, the testimony was incompetent. *Cefola* v. *Siegel-Cooper Co.* (1908) 111 N.Y. Supp. 1112.

Where such knowledge of dangerous tendency or quality is possessed by the individual charged with responsibility, evidence of the accidents whether one or many, through which this knowledge was derived, is uniformly admitted. Clearly, it gives rise to an inevitable inference of negligence. *City of Chicago* v. *Powers* (1866) 42 Ill. 169. But even where such notice and knowledge are lacking, proof of prior effect, it is submitted, is relevant. In order to investigate properly the merits of a given accident, it is not merely desirable, but material to