reason of the action being brought also in the foreign country. The Court of Appeal decided that the Court had jurisdiction, but at the same time there was no presumption that the multiplicity of actions was vexatious, and a special case must be made out to induce the Court to interfere. The late Master of the Rolls says, p. 400 :—"It appears to me that very different considerations arise when both actions are brought in this country, and where one of them is brought in a foreign country. In this country, where the two actions are by the same man in courts governed by the same procedure, and where the judgments are followed by the same remedies, it is *prima facie* vexatious to bring two actions where one will do. . . . The same principle applies, it appears to me, wherever the judgment can be enforced, and for that reason I think the case of *Lord Dillon* v. *Alvares*, 4 Ves. 357, can no longer be relied on. . . . *It is possible that the same observation might be made as regards the Queen's Courts in any other part of the world, but that of course may be subject to exception as regards the nature of the remedy.* But where it is in a foreign country, it certainly appears to me that we cannot draw the same inference. Not only is the procedure different, but the remedy is different. Take the case of an Englishman suing abroad a foreigner resident abroad, and the foreigner coming to this country, as in *Cox* v. *Mitchell*, 7 Q. B. (N.S.) 55, the plaintiff might have totally different remedies. . . . He might have a personal remedy in one country, and a remedy only against the goods in another. . . . It is by no means to be assumed in the absence of evidence that the mere fact of suing in a foreign country, as well as in this country, is vexatious. It seems to me you must make out a special case, and there is, therefore, that distinction between the case of the two actions being brought in the Queen's Courts, and one action being brought in the Queen's Court, and the other in the Court of a foreign sovereign." According to *Hughes* v. *Rees*, although the Provinces of Quebec and Ontario are both in the Queen's Dominions, the pendency of the one action cannot be pleaded in bar of the other. Yet this would seem in accordance with the principles of the law as above enunciated, by reason of the different remedies a plaintiff might have in the one, as compared with those he might have in the other. It would seem, too, from *McHenry* v. *Lewis*, that in the case of a suit for the same matter pending in a foreign country, the Court would be more willing to interfere, under its general jurisdiction, to restrain vexatious and oppressive legislation, after a decree has been made in one of the actions, than before."

WRIT OF EJECTMENT—RE-ENTRY OF LANDLORD.

The next case, *Ex parte Sir W. Hart Dyke*, p. 410, is mainly concerned with points of bankruptcy law, and therefore does not require notice further than to say that in it the question is raised whether, since the Imp. Common Law Procedure Act of 1852, and the Judicature Acts, the issuing of a writ of ejectment, at all events after the appearance of the defendant, is equivalent to re-entry by the landlord. A decision on this point was not, however, necessary to the case, and there the Court refused to deal with it.

A. H. F. L.

SELECTIONS.

SIR GEORGE JESSEL.

The death of the Master of the Rolls will be received throughout the country, and particularly in the legal profession, as a national loss. The public were beginning to obtain a true estimate of Sir George Jessel's powers but lawyers alone fully knew his greatness; The popular appreciation of judges is generally built up of facts which but little influence the lawyer. If the judge has been in Parliament, a reflex of his Parliamentary reputation follows him to the bench ; but Sir George Jessel's Parliamentary career did not lay the foundation of a reputation. His genius was too purely intellectual, and contemptuous of