The Canada Law Journal.

VOL. XXVI. FEBRUARY 17, 1889. NO. 3

A CORRESPONDENT draws our attention to Con. Rule 482, which he says embodies the most summary proceeding known to the Canadian practitioner. It reads thus: "On every appointment the party on whom the same is served shall attend such appointment *without waiting for a second*, or in default," etc.

IT is gratifying to see an improvement in the Ontario Reports, in this that the judges have got into the better way of shortening their judgments. It was once wittily said, we are informed, by the chief of the Q.B. Division, speaking of one of the judges at Osgoode Hall celebrated for the expenditure of many words in his judicial utterances, that the length of his judgments depended entirely upon the thickness of the pad of paper he began to write upon. We can fancy that his reporter often devoutly wished that he would be more economical in his stationery. We are indebted to some of the more recent appointments for giving a good example in this respect.

THE decision of the Common Pleas Divisional Court in *Canada Cotton Co.* v. *Parmalee*, noted ante p. 32, seems somewhat at variance with the decision of the Court of Appeal in *Haggin* v. *Comptoir D'Escompte de Paris*, 23 Q. B. D., 519, noted ante p. 8. It is true that the decisions are founded upon two different Rules, but the principle of the decision ought, it appears to us, to be the same in each case. In *Haggin* v. *Comptair D'Escompte de Paris* the question was whether a foreign corporation aggregate carrying on business in England could be served with a writ of summons in the same manner as an English corporation aggregate, and the Court held that it could, on the ground that a corporation may be said to be resident wherever it carries on business, in which respect it differs from a mere private partnership, as was pointed out in *Russell* v. *Cambefort*, 23 Q.B.D., 526, also noted ante p. 8. In *Canada Cotton Co.* v. *Parmalee*, the question was whether a foreign corporation doing business in Ontario was "within Ontario" within the meaning of Rule 935, and the Court held that it was not. In *Haggin* v. *Comptoir D'Escompte de Paris* the Court of Appeal was of opinion, as we have seen that a foreign corporation aggregate may be said to be resident wherever it carries on business, and if that is correct, then it would seem to follow that a