

fields of Golgotha." The learned Chief Justice may possibly be stronger in the law than in the gospel, for when he said *Golgotha* he probably meant *Aceldama*, that is "the field of blood." But however this may be, it seems hardly consistent with the fitness of things that a Chief Justice of England should call the Pope (for that is, we presume, what he meant by the expression) "the head of Christendom." England is a part of Christendom and we had always thought that the King or Queen of England was head of the church so far as the British Empire is concerned. The great multitude who hold the tenets of the Greek church moreover, do not recognize the Pope as the head of Christendom. The remark was a very natural one for a member of the Roman Catholic church to make, and but for the position held by this most learned and excellent judge, who was appointed by Her Majesty to dispense justice in her name, would not be worth noticing. This, however, is but "a spot on the sun," and it is gratifying to learn that the address was warmly and enthusiastically received, not only for its intrinsic merits, but also on account of the oratorical gifts displayed in its delivery.

---

#### A WORD ABOUT PARAPHERNALIA.

We have read Mr. T. F. Uttley's contribution to the July-August number of the *American Law Review* (Vol. xxx., No. 4, p. 556), on the subject of paraphernalia, with a great deal of pleasure and profit; but while we agree in the main with the views therein expressed, we feel constrained to point out one instance in respect of which the learned writer lays himself open to criticism. In the course of his article he says: "The English law of the wife's paraphernalia is borrowed from the civil law, and consist in her wearing apparel and ornaments suitable to her rank, even the jewels of a peeress." Now apart from any objection to this statement from a syntactical point of view, it strikes us as being substantially inexact and misleading. It is quite true that the paraphernal *idea* was borrowed by the English lawyers from the civilians; but in the civil law *parapherna* comprised real