

STATUTE OF LIMITATIONS—MONEY CHARGED ON LAND—REAL PROPERTY LIMITATION ACT, 1874 (37 & 38 VICT., c. 57), s. 8—(R.S.C., c. 133, s. 23)—21 JAC. I, c. 16, s. 3.

In *Barnes v. Glenton* (1899) 1 Q.B. 885, the Court of Appeal (Smith, Collins and Romer, L.JJ.) have reversed the decision of Lord Russell, C.J. (1898) 2 Q.B. 223, (noted ante, vol. 34, p. 687.) It may be remembered that he decided in effect that, where a simple contract debt is charged on land, there the twelve years' limitation of the Real Property Limitation Act applies, and not the six-year limitation of the statute of James. When noting the decision of the Chief Justice, we expressed a doubt whether it would be followed in Ontario, and now it seems it is not good law in England.

GAMING—BETTING—PLACE WHERE BETTING CARRIED ON—BETTING ACT, 1853 (16 & 17 VICT., c. 119), ss. 1, 3—(CR. CODE, s. 197).

Brown v. Patch (1899) 1 Q.B. 892, is another decision on the question of what is "a place" where betting is carried on within the meaning of the Betting Act, 1853 (16 & 17 Vict., c. 119). In this case the defendant was a bookmaker who, with his clerk, entered an inclosure where horse races were carried on, and erected a cane structure about 5 ft. high, with four legs or supports, and having on top a board with the words "Bob Patch" (the defendant's name), "London. All in race or not; pay first past the post." Before each race, the odds offered by the defendant on the various horses running were written on a board. He stood on a box placed close to the structure, and invited people to bet with him, and, assisted by his clerks, made bets with others on each race. The question was whether the defendant had used "a place for the purpose of betting with persons resorting thereto." Darling and Channell, JJ., answered the question in the affirmative. See Cr. Code, s. 197, under which possibly the same conclusion might be arrived at; but see Cr. Code, s. 204 (2), which validates betting on a racecourse of an incorporated association during the actual progress of a race meeting.

ERRATA:—p. 483, 2nd line, for "after" read "at her"; p. 484, 9th line for "permits" read "prevents"; p. 486, 27th line, for "accumulation" read "acceleration."