and only a moment, the court officials were thunderstruck, and then half a dozen constables tumbled over each other in their anxiety to inform the lady that her sex had not yet been elevated to the woolsack.

CONSENT IN LARCENY.—The question, what constitutes consent in larceny, has again been passed upon in Great Britain. The answer has been in the air since the cases of *Regina* v. *Ashwell*, 55 Law J. Rep. M. C. 65 ; L. R. (1885) 16 Q. B. 190, and *Regina* v. *Flowers*, 56 Law J. Rep. M. C. 179 ; L. R. (1886) 16 Q. B. 643. In the first of these cases B. gave A. a sovereign, both supposing it a shilling. When A. discovered the mistake he kept the money, was convicted of larceny, and by an evenly-divided Court this conviction was affirmed. Less than three months later the same Court, on substantially the same facts, unanimously quashed a similar conviction in *Regina* v. *Flowers*. These decisions were reviewed in a discussion of Consent in the Criminal Law, by Professor J. H. Beale, Jr., 8 *Harvard Law Review*, 317, and have elsewhere excited considerable controversy ; so that the recent case of *Regina* v. *Hehir*, 29 Ir. L. T. 323, which settles the law for Ireland, is of no little interest. A 10*l.* note was mistaken for a 1*l.* one under circumstances similar to those of *Regina* v. *Ashwell*, and by a vote of five to four the latter case was expressly disregarded, and a conviction quashed. This decision, coupled with *Regina* v. *Flowers*, which, however, assumed to distinguish *Regina* v. *Ashwell*, renders it very doubtful whether *Regina* v. *Ashwell* would be followed even in England. The Irish Court (says the *Harvard Law Review*) certainly seems to do less violence to any logical theory of consent. But our contemporary must not forget that the English Court was equally divided in opinion in *Regina* v. *Ashwell*.—*Law Journal.*

UNIVERSITY EDUCATION.—"For the highest success at the English bar," says one writer, "a university education is regarded as essential." What, then, about the Lord Chief Justice of England, who was a solicitor first and a barrister afterward? In the ordinary sense of the term, Lord Russell had no university education. And what, again, about Sir Edward Clarke, of whom the same may be said? A university education affords advantages to members of both branches of the profession, but to talk about it being essential either for one or the other is simply silly." —*The Brief*, (England).