that it had been taken in satisfaction, or with the intention of suspending the right to distrain, and was, therefore, no authority for saying that the giving of the bill was no evidence of an agreement to suspend the right to distress, had such an agreement been averred.

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In the case of Fuller v. The Blackpool Gardens Co., 1895, 2 Q.B., 459, one or two points of interest under the English Copyright Act of 1833 (3 and 4 W. 4, c. 15) are determined. It was held by the Court of Appeal (Lord Esher, M.R., and Smith and Kay, L.JJ.) that a musical composition, in order to be a dramatic piece within the meaning of the Act, must have the characteristics of a dramatic piece, and whether it has such characteristics is a question of fact which must be determined by the nature of the composition itself. A song that does not require for its representation either dramatic effects or scenery is not a dramatic piece, though intended to be sung in appropriate costume on the stage of music halls. The well-known ditty of "Daisy Bell" was, therefore, determined not to be a dramatic piece within the meaning of the Act. It was also determined that, in order to secure the copyright of a musical composition, it is necessary that every copy published should bear the notice that the right of publication is reserved, as required by the Act of 1882.

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Thomas v. Lulham, 1895, 2 Q.B., 400, was an action by a landlord to recover possession of the demised premises for non-payment of rent, under C.L.P. Act, 1852 (15 and 16 Vict., c. 76), s. 210. The defendant contended that the plaintiff, having distrained for the rent in arrear, had thereby waived his right to recover possession under the C.L.P. Act, notwithstanding that the plaintiff had failed to realize the full amount due by the distress, and there still remained a year's rent in arrear. Mathew, J., so held, but the Court of Appeal (Lord Esher, M.R., and Kay and Smith, L.JJ.) reversed his decision, holding that the distress did not operate as a waiver of the right to proceed under the statute to recover possession.

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In *re* Coalport China Co., 1895, 2 Ch., 404, one of the articles of the company provided, amongst other things, that the directors should have power to refuse to register transfers of shares, among other cases, "where the directors are of opinion that the proposed transferee is not a desirable person to admit to membership." The directors had, in pursuance of this power, resolved to refuse to register a transfer, but without giving any reason. There was no evidence of any want of *bona fides* on their part, and it was held by the Court of Appeal (Lindley, Lopes and Rigby, L.JJ.) that the refusal could not be successfully questioned, and the decision of Kekewich, J., to the contrary, was reversed.

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In Harle v. Jarman, 1895, 2 Ch. 419, 13 R., Aug., 140, a married woman had, by a separation deed made in 1875, which was not acknowledged, covenanted to release when discovert a reversionary life interest in real and personal estate. The same deed provided for the payment to her of an annuity which she had received. On her husband's death, the persons beneficially entitled to the release claimed that the wife should execute the release; but North, J., held that as to the land the covenant was void for want of acknowledgment, and that as to her reversionary interest in the personal estate she had no power to bind it by deed made during coverture, and that her acceptance of the annuity did not amount to an election to confirm the deed.

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In *re* Debenham and Walker, 1895, 2 Ch., 403, 13 R., Aug., 161, is only necessary to be referred to as marking a difference between the practice in England and Ontario. In this case an order for taxation between solicitor and client had been obtained by a solicitor, a balance was found due to him from his client, and he applied for a summary order for payment thereof, but North, J., held that an action must be brought.