

accuracy (*Regina v. Castro*), the award of a writ of Nisi Prius became more and more a matter of course, the old practice as to the trial of indictments before the Court itself became a rarer and rarer exception, and the most modern precedents are those of *Regina v. O'Connell* (1843), *Regina v. Castro* (1874), and *Regina v. Parnell* (1880), two of them Irish cases. But the right, as already stated, remains unaffected by the Judicature Acts, except that, instead of having the whole Queen's Bench Division sitting, as occasionally happens in the Court for Crown Cases Reserved, a Divisional Court of two or three judges constitute the Court. The incidents of the trial in no way differ from those in an ordinary trial of an indictment in the Queen's Bench Division, except that each judge is entitled to charge the jury, which in some old State trials, as of the seven bishops, has led to conflicting directions from the Bench. The right which exists in *Regina v. Jameson* (a misdemeanor case) to apply for a new trial is not in any way affected by trial at Bar, and such an application *could* be made to any judges of the Division, even including those who sat at the trial. This was actually done in *The Attorney-General v. Bradlaugh*."

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#### APPOINTMENTS.

The *Canada Gazette* announces the appointment of Mr. C. A. Geoffrion, Q.C., of Montreal, to be a member of the Queen's Privy Council for Canada (appointment dated 13 July, 1896), and of Mr. Ludovic Brunet, of Quebec, to be a commissioner to act judicially in extradition matters under the Extradition Act within the Province of Quebec (appointment dated 20 August, 1896).

QUEEN'S COUNSEL.—Two appointments of Queen's Counsel appear in the *Canada Gazette* of 29th August. Charles Fitzpatrick, of the City of Quebec, and Augustine Samuel Hurd, of the City of Sherbrooke. The appointment of Mr. Fitzpatrick is dated 7th March, 1893, and that of Mr. Hurd, 11th June, 1896.