

of the heat and the general exodus from the large towns during the mid-summer months, the courts close on the 30th June and resume on the 12th September.

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The Supreme Court of the United States is a hard worked tribunal. We notice, however, that Mr. Justice Harlan, one of the members of the Court, is to deliver thirty-six lectures in the summer course of the University of Virginia, during the months of July and August. Four or five law lectures per week in the vacation time does not seem much like relaxation.

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#### COURT OF APPEAL.

LONDON, 29 April, 1897.

*In re* THE EASTMAN PHOTOGRAPHIC MATERIALS COMPANY'S  
TRADE-MARK (32 L. J.).

*Trade-mark—Descriptive word—"Solio"—Photographic paper—  
Registration—Patents, Designs, and Trade-marks Act, 1888, s.  
10, subs. 1 (d) (e).*

Appeal from a decision of Kekewich, J., (noted 31 L. J. N. C. 649; W. N. (1896) 158), refusing to direct the registration of the word "Solio" as a trade-mark in connection with photographic paper. The Comptroller had refused to register the word upon the ground that it indicated the character and quality of the goods, and therefore under section 10, sub-section 1 (e) of the Patents, Designs, and Trade-marks Act, 1888, it could not be registered. It appeared to be his practice not to put on the register the word "sun" or "sol" in connection with photography.

Kekewich, J., upheld the decision of the Comptroller, being of opinion that "Solio" connoted the idea of "sol" or the "sun."

The applicants appealed.

J. F. Moulton, Q. C., and D. M. Kerly, for the appeal, contended that the sub-clauses (d) and (e) of sub-section 1 of section