mately turn upon the question of whether a *bona fide* belief that one has an interest in the subject of an action, justifies one in intervening therein.

CANADIAN QUEEN'S COUNSEL BEFORE THE PRIVY COUNCIL.

IT has been the practice of English Queen's Counsel to lead Colonial Queen's Counsel in appeals before the Judicial Committee of the Privy Council, no matter what was the official status or seniority of the Colonial Q.C. We are glad to learn that when Mr. Thomas Hodgins, Q.C., was in England last May investigating Imperial State Papers relating to the boundaries of the Province of Ontario, he enquired of Mr. Henry Reeve, C.B., the Registrar of the Imperial Privy Council, whether there was any rule of the Judicial Committee giving precedence to English Queen's Counsel over Canadian Queen's Counsel in all cases, even where the latter was Attorney-General of Canada. Mr. Reeve replied that there was no rule, but that the practice was for English Queen's Counsel to lead in all cases, and that no exception was made even where the Canadian Queen's Counsel was a Canadian Attorney-General. The same question was submitted to Mr. Andrew R. Scoble, Q.C., a Bencher of Lincoln's Inn, who had been for many years Advocate-General of Bombay. His reply was that he could not, nor did he know of any member of the English Bar, who could, authoritatively answer the question as to the etiquette which governed precedence in the Judicial Committee of the Privy Council. But he added that "theoretically, as members of the Colonial Bars have right of audience in the Judicial Committee, their precedence is regulated by seniority, and a Canadian Q.C. of 1860 would rank before an English Q.C. of a later year. But the precedence of Colonial Law officers does not seem settled; and besides there is no *obligation* on the part of an English Q.C. to take a junior brief with a Colonial Q.C. as leader. Of course the English Attorney and Solicitor-General lead everybody."

The question remained unsettled until Mr. Attorney-General Mowat arrived in England to argue the question of the boundaries of Ontario and Manitoba before the Judicial Committee, when he offered the junior brief in the case to Mr. Scoble, Q.C. Before accepting the brief, Mr. Scoble enquired through Sir Arthur Hobhouse, one of the judges of the Judicial Committee, whether there was any precedents on the point in the records of the Privy Council. No precedent having been found, the matter was referred to the Attorney-General of England, Sir Henry James, M.P., whose opinion appears to concede the right of Canadian Queen's Counsel to equal privileges with their English brethren before the Judicial Committee, and is as follows:—

"It appears to me that the Privy Council is common ground to the Bars of this country and all our colonies and dependencies. I see no reason why we should not accord equal rank to Her Majesty's counsel in the Colonies when pleading in colonial causes. As the Canadian Queen's Counsel is the Attorney-General of Ontario, I think there is an additional reason why, in this particular case, you should not object to allow him to act as your leader."

In communicating this opinion the writer adds: "This is common sense, and I think commends itself to the Bar generally."

Of course there may be cases before the Privy Council, as before the courts in Canada, where it may be proper to have a junior Queen's Counsel of eminence as leader to a senior Queen's Counsel. Such an arrangement is always possible where it is considered advantageous to the management of the case. But it is satisfactory