disproportion could hardly be in a fit state of mind to conduct his defence or take his trial. The jury found that the prisoner was unfit to plead, and that the articles which had provoked him were quite uncalled for. In this verdict the judge expressed his full concurrence.—Central Criminal Court (Mr. Justice Wills).—*Times*, November 25th.

An uunsual instance of procedure. The preliminary issue whether a prisoner is fit to plead is not usually raised unless the prisoner is very deeply insane, either extremely demented or wildly maniacal. In this case the prisoner had sufficient ability to cross-examine with considerable acumen. The case is noteworthy from the formal ruling of the judge that a great disproportion between provocation and retaliation is itself a sufficient proof of insanity to exonerate a prisoner from being dealt with as an ordinary criminal. This is a doctrine which medical men have often brought forward in courts of law, and which the judicial mind has always shown the utmost reluctance to admit. It is important to have a case on record in which the doctrine has been explicitly accepted by the bench. Whether it was worth while to invoke the machinery of the law to protect a journalist from the natural consequences of jeering at a lunatic, a thing that no decently conducted asylum attendant would think of doing, is a matter of opinion.

Reg. v. *King.*

Philip King was charged with the murder of his mother-in-law, his wife, and his two children. Prisoner had murdered the two women in a very brutal manner, and the two children were found in the same room, the one smothered, and the other dead of cold and starvation. The plea of insanity was not raised, and the case is mentioned here mainly to show that a very brutal and multiple murder does not necessarily imply insanity on the part of the murderer.—*Dublin Express*, December 13th and 14th.

Reg. v. *Schneider.*

Prisoner, a butcher, æt. 36, was charged with the wilful murder of Conrad Berndt. The unfortunate Berndt was murdered and placed in an oven, in which his remains were partially consumed. Counsel for the defence suggested insanity, but called no evidence, and on the part of the prosecution the evidence of sanity was strong.—Guilty.—C. C. C. (Mr. Justice Hawkins).—*Times*, December 14th and 15th.

Reg. v. *Lawley.*

William Lawley, 55, tradesman, was charged with the murder of his wife. In August, 1897, he became insane, violently attacked his wife and was sent to Coton Hill Asylum. In May, 1898, he was liberated on trial and lived with relatives and in charge of an attendant in Manchester. On July 2nd the attendant was dispensed with. On July 16th he left Manchester, went to his wife's home at Much Wenlock and murdered her. Without hearing counsel for the defence the jury found the prisoner guilty but insane.—Shrewsbury Assizes (Mr. Justice Ridley).—*Times*, November 1st.

Illustrates the great difficulty in deciding when a lunatic is sufficiently recovered to be at large.

Curtis v. *Callingham and others.*

A probate case. The will was dated July, 1894, and it was shown that the testatrix had suffered from delirium tremens in 1878, and that in her later years she had been scarcely ever sober. One or two witnesses had seen her sober occasionally, and the witnesses to the will stated that she was sober when she executed the will, which was upheld by the jury.—Probate Division (Mr. Justice Barnes).—*Times*, January 26th.

The evidence of incapacity was very strong indeed, but the trial had the usual result.

Hodson and Another v. *Park.*

The defendant presented a petition for a reception order with respect to his wife, the daughter of the plaintiffs, and in the statement of particulars attached to