

THE GENERAL DIGEST, VOL. IV.—General Digest of the Decisions of the Principal Courts of the United States. Reference to all Reports, Official and Unofficial, Published During the Year ending September, 1889. Annual—being Vol. IV. of the series. Prepared and published by the Lawyer's Co-operative Publishing Co. Rochester, N. Y., 1889.

We regret to be obliged to state the above title page does not tell the truth, in so far as it says that the work refers to *all* reports, official and unofficial, published during the year ending September, 1889. During that period there were published in Illinois several volumes of appellate reports, and in Missouri several volumes of "Missouri Appeal Reports," none of which are digested in this volume. Illinois is the fourth State, and Missouri the fifth State in population in the Union. The Appellate Courts of Illinois sustain a very important relation to the judicial system of that State. The Courts of Appeal of Missouri are courts of final jurisdiction, though the learned editors of this Digest probably do not know the fact; and they do nearly two-thirds of the final appellate work of that State. The entire omission of the decisions of these courts, from a work which professes to be a *general* digest, and carries on its title page the statement above quoted, only leads the searcher to wonder *what else* has been omitted. The reports thus omitted are included in the two rival digests,—the Complete Digest, published in New York by the Digest Publishing Co., and the American Digest, published in St. Paul by the West Publishing Co.

Aside from this, we have seen nothing in the present work which has not given us pleasure. A good thing to be said in its favor is that it undertakes to cover an entire judicial year in one volume, instead of dividing it into two volumes, as the Complete Digest does. One who uses the Complete Digest must, to cover the same period of time, make a double search, and this is a great point against it in comparison with its two competitors. Another thing which can be said in favor of this Digest is, that its paragraphs are fairly well drawn,—indeed, as well as would seem consistent with the high condensation necessary to get so much matter in a single volume. We believe that it will be

found entirely satisfactory in this respect. Another good feature, is that it contains a table of cases criticised, without which no digest can be pronounced complete. It has the usual points of a good digest. In digest-making the Co-ops. must be granted to have been fairly successful. They have had the good sense to omit the blotching of bold-faced words scattered through the body of their text, which spotted the pages of their former Digests all over like the measles. They are struggling, like the other digest-makers, with the question of how to digest all of the decisions of the official and unofficial reports, which are published at different periods of time, without duplicating them. The Wests have mastered the difficulty as near as it can be done, — in a manner which we expect to explain to our readers in our next issue.

The digest-makers are, of all book-makers, the real benefactors of the profession. Their labor is the hardest drudgery, and they never get adequate pay for it. The lack of good digests, kept down to a recent date, is a great lack everywhere. We know of cases where a court of last resort has departed entirely from its former rulings, and overruled itself without knowing it, in the hurry of its work, simply because there was no digest of its decisions brought down to a period which included the overruled cases. In Missouri we have had a judicial system for more than seventy years, and yet it is not settled in what manner a book account is to be proved in a judicial trial, — and this for the very reason above stated, as we could easily show.