

adopt a uniform and international delay in case of cheques drawn from a country to another country (French proposal) but the point is not finally settled.

Then, if we try to find which delays are adopted in other countries, we see that they are very different.

The English Law (Bills of Exchange Act, 1882, s. 74) says that the cheque must be "presented for payment within a reasonable time of its issue", and adds that "in determining what is a reasonable time, regard shall be had to the nature of the instrument, the usage of trade and of bankers, and the facts of the particular case". This is so vague, that the English delegate to the Conference of the Hague was asked to specify what may mean "reasonable time" according to the English jurisprudence, and he did answer that the delay admitted by such jurisprudence is 24 hours, but that as a matter of fact the banks have the custom to pay cheques within six months of their issue, and even after and up to the time of prescription (that is to say six years) but then after approval of the drawer. The French Law (law 14th. June 1865) says that the cheque must be presented within five days if to be paid in the same place, and eight days if to be paid in another place; but as a fact we know that the French bankers also have the custom to extend this too short