

peal (Lord Reading, C.J., and Eady, L.J., and Bray, J.), on appeal from a Divisional Court, decide that a Rule of the Crown office limiting the time within which a writ of certiorari may issue, is not binding on the Crown and has no application where the writ is applied for on the fiat of the Attorney-General. The time limit laid down by Ont. Rule 1285 (see Holmsted's Jud. Act, p. 141), and by the Ont. Jud. Act, s. 63 (7) (a) would therefore appear, on the authority of this case not to apply to applications made by the Attorney-General assuming that he may, and does proceed, under those provisions.

CONTRACT—ILLEGALITY—FRAUD ON BANKRUPTCY LAWS—AGREEMENT WHEREBY CREDITOR IS TO GET PART OF TRUSTEE'S REMUNERATION.

*Farmers' Mart v. Milne* (1915) A.C. 106. This, though an appeal from a Scotch Court, nevertheless deals with a question in which Scotch and English law are similar. The plaintiffs were a firm of land agents, and they agreed with their own manager that he should undertake trusteeships in bankruptcy on the terms that his remuneration as such trustee should be pooled with the receipts of the firm for any business done by the firm for any such estate of which he should become trustee, and that the net proceeds, after deducting any debt due by such estate to the firm, should be divided in certain specific proportions between the firm and the manager. The House of Lords (Lords Dunedin, Atkinson and Shaw) held that this was an attempt on the part of the plaintiffs to eke out the dividends payable to them as creditors out of such estates by sharing in the trustees' remuneration, and that such a transaction was a fraud on the bankruptcy laws, which aimed at an equal distribution among all creditors, and was, therefore, illegal and consequently not enforceable.

LOCAL GOVERNMENT—DWELLING-HOUSE UNFIT FOR HABITATION—CLOSING ORDER—PROCEDURE—RIGHT OF OWNER TO BE ORALLY HEARD—RIGHT OF OWNER TO INSPECT INSPECTOR'S REPORT—"NATURAL JUSTICE."

*Local Government Board v. Arlidge* (1915) A.C. 120. This case, though turning on the provisions of an English statute conferring powers on local authorities to inspect and order the closing of premises found unfit for human habitation, is deserving of notice here. The Act authorised the local authority to make a closing order, and provided that an appeal might be had from such order