

setting up the compromise as binding upon them. But Komer, J., was of opinion that the defendants, as purchasers from the American company, were not bound as privies in estate by a judgment recovered against their vendors in an action commenced after the defendants had acquired their title; and that neither was the fact of their having assisted in the defence of the action, or paid the costs, any ground for holding them estopped by the judgment in the previous action; and as he found, as a matter of fact, that there were circumstances existing which justified the compromise, and that it was binding on the defendants, he dismissed the action.

The Law Reports for May comprise, (1894) 1 Q.B., pp. 669-847; (1894) P., pp. 149-190; (1894) 1 Ch., pp. 597-744; and (1894) A.C., pp. 69-201.

LIBEL—INJUNCTION—INTERLOCUTORY INJUNCTION PENDING TRIAL—EXHIBITION OF EFFIGY—QUESTION FOR JURY WHETHER PLAINTIFF CONSENTED TO EXHIBITION—DISCRETION—JUDICATURE ACT, 1873 (36 & 37 VICT., c. 66), s. 25, s.s. 8—(ONT. JUD. ACT, s. 53, s.s. 8).

Monson v. Tussaud, (1894) 1 Q.B. 671, is a case which arose out of the celebrated "Ardlamont mystery." The plaintiff having been tried for murder, and a verdict of "not proven" having been returned, the defendants, who had an exhibition of wax figures, forthwith added to their collection a portrait model of the plaintiff, which they placed in a room leading to the "Chamber of Horrors." This room also contained figures of Napoleon, and three other persons, of whom one was convicted of murder, another committed suicide to avoid arrest, and another was a person charged with having been concerned in the alleged Ardlamont murder, but who could not be found. In the "Chamber of Horrors" were exhibited figures representing, for the most part, notorious murderers and relics of murders, and also a model of the spot where the supposed Ardlamont murder took place. The plaintiff applied for an interim injunction to restrain the exhibition of the figure of himself pending the trial of the action. The defendants resisted the motion on the ground that the exhibition was not libellous. The Divisional Court (Mathew and Collins, JJ.) granted the order, holding the exhibition to be libellous. On appeal, it appearing by further affidavits filed that