

proceeding against any foreign sovereign;⁶ any ambassador or other diplomatic agent representing a foreign sovereign and accredited to the Crown;⁷ any person belonging to the suite of such ambassador or diplomatic agent.⁸ The property of a foreign sovereign cannot be seized or arrested.⁹ In the case of the *Duke of Brunswick v. King of Hanover*¹⁰ the defendant was not only a foreign sovereign but also a British peer; and the House of Lords (Cottenham L.C., Lords Lyndhurst, Brougham, and Campbell) unanimously affirmed the decision of the Master of the Rolls (Lord Langdale) that the respondent being a foreign sovereign, coming to England, cannot be made responsible in the Courts there for acts done by him, in his sovereign character, in his own country, in virtue of his authority as a sovereign, and not as a British subject. The question remains whether the privilege of a foreign sovereign not to be sued for acts done in his private capacity, qua sovereign, continues after he has ceased, e.g. by abdication, to be a sovereign.¹¹ The privilege of the ambassador extends to all persons associated in the performance of the bona fide duties of an embassy or legation. Thus, a chargé d'affaires,¹² a secretary,¹³ or a chorister employed in the chapel of an embassy,¹⁴ is privileged. The incurring of debts,¹⁵ the breach of a promise to marry,¹⁶ the running down of an English boat by a foreign one in Dover Harbour¹⁷—in all these cases no

6. *Mighell v. Sultan of Johore*, [1894] 1 Q.B. 149, C.A.; and see *Foster v. Globe Venture Syndicate*, [1900] 1 Ch. 811; *The Jassy*, [1906] P. 270.

7. *Parkinson v. Potter* (1885), 16 Q.B.D. 152; *Taylor v. Best* (1854), 14 C.B. 487; 23 L.J.C.P. 89; *Magdalena Steamship Co. v. Martin* (1859), 2 E. & E. 94; *Musurus Bey v. Gadban*, [1894] 1 Q.B. 533; [1894] 2 Q.B. 352, C.A.

8. *Fisher v. Begrez* (1832), 2 L.J. Ex. 13; Nelson, 401; *Novello v. Toogood* (1823), 1 B. & C. 554, 582; *Macartney v. Garbutt* (1890), 24 Q.B.D. 368; *Musurus Bey v. Gadban*, cited supra.

9. *The Parlement Belge* (1880), 5 P. Div. 197.

10. 6 Beav. 1; 2 H.L.C. 1.

11. *The Parlement Belge*, cited supra.

12. *Taylor v. Best*, cited supra.

13. *Hopkins v. De Robeck* (1789) 3 T.R. 79.

14. *Fisher v. Begrez* (1832), 2 L.J. Ex. 13.

15. *Wadsworth v. Queen of Spain* (1851), 17 Q.B. 171.

16. *Mighell v. Sultan of Johore*, cited supra.

17. *Magdalena Steamship Co. v. Martin*, cited supra.