

persuasion, or they might do it by intimidation, which would be wrong. What passed in conversation between persons employed as pickets and others was part of the *res gestæ*, and was admissible in evidence, and the defendants could not be made irresponsible for the acts of the picket they employed. The following cases were referred to: *Temperton v. Russell* (1893), 1 Q. B. 715, 9 T. L. R. 393; *Flood v. Jackson* (1895), 2 Q. B. 21, 11 T. L. R. 335, and the *Mogul* case.—*T. F. Uttley, in the London Law Magazine.*

EXTRADITION LAW.

By the latest accounts from France, Arton, who was concerned last spring in making leading cases in the English law of extradition, though convicted by the Cour d'Assises of the charges for which he was surrendered, has now got the conviction quashed on grounds alleged to be technical, but probably of some substance; for the French judicial authorities found even more difficulty than our Lord Chief Justice in discovering the exact offence against French law which Arton could be said to have committed.

A charge of larceny within the jurisdiction of the French Republic, preferred at Bow Street on August 1 and 8, illustrates well the difficulty created by different systems of criminal jurisprudence. French and German law permits the trial within the national territory of offences by a subject wherever committed, if such offences constitute a breach of the national criminal law. English law follows, with certain statutory exceptions, the old theory that jurisdiction, especially in criminal matters, is territorial. France and Germany having power to try their own subjects, will not agree to extradite them for offences abroad; and England, in dealing with these States, reciprocally refuses to surrender her subjects to them, although she cannot try them for the offence involved. The Larceny Amendment Bill, now assured of the royal assent, will get rid of this anomaly in cases where Britons receive here goods stolen abroad. But the Briton who thieves in France and Germany will still be free from prosecution if he can get here; and in the case before Mr. Lushington the anomaly goes a little further. The man accused is a German by birth, but before the date of his alleged offences in France had been naturalised as a British subject, thereby relieving him, if