

ture of a liqueur, but not by the plaintiffs' secret process. The defendant had registered themselves as assignees of the plaintiffs' trade mark. The plaintiffs had removed to Spain where they carried on their business of making liqueur by their secret process, and which they continued to call "Chartreuse." They claimed to rectify the register of trade marks by striking out the entry of the defendants, and also claimed an injunction to restrain infringement. The Court of Appeal (Lord Alverstone, C.J., and Buckley and Kennedy, L.JJ.) held on the evidence that the word "Chartreuse" though originally merely the name of a place, had acquired in England the secondary meaning of a liqueur made by the monks of the Grand Chartreuse, and was a good trade mark, and that the judgment of the French court was ineffectual to transfer the property of the plaintiffs in their English trade mark, and, therefore, that they were entitled to the rectification of the register by striking out the entry of the defendants being assignees of the plaintiffs' trade mark, and also to an injunction as prayed.

TRADE UNION—MEMBER OF UNION—FINE DUE TO UNION—NON-PAYMENT OF FINE—THREATENING EMPLOYER TO PROCURE DISMISSAL OF WORKMAN FOR NON-PAYMENT OF FINE—TRADE DISPUTE—TRADE DISPUTES ACT, 1906 (6 EDW. VII. C. 47) SS. 1, 3; s. 5(3)—(R.S.C. c. 125, s. 32).

In *Conway v. Wade* (1908) 2 K.B. 844 the plaintiff was a member of a trade union and was in 1900 fined 10s. for breach of the union rules. He did not pay the fine, and the other members of the union, who were his fellow workmen, knew that he had not paid it, and instigated the defendant, who was district delegate of the union, to represent to the foreman of the plaintiff's employer that unless the plaintiff were dismissed there would be trouble with the men. In consequence of this representation the plaintiff was dismissed. At the trial the plaintiff recovered judgment for £50. which was affirmed by the Divisional Court. The Court of Appeal (Cozens-Hardy, M.R., and Farwell and Kennedy, L.JJ.), however, have reversed the decision, holding that the defendant was protected by the Trades Disputes Act, 1906, s. 3. Whether R.S.C. c. 125, s. 32, would equally protect such a transaction seems doubtful. Farwell, L.J., seems to think that though the Act cannot make evil good, it has at all events made it not actionable. See p. 856.