

and Smith, L.JJ.), though dismissing the appeal, varied the terms of the injunction so as to make it more strictly conform to the words of the Conspiracy and Protection of Property Act, 1875 (38 & 39 Vict., c. 86), (see Cr. Code, sec. 523 (f)), and restrained the defendants, etc., "from watching or besetting the plaintiffs' works for the purpose of persuading or otherwise preventing persons from working for them, or for any purpose except merely to obtain or communicate information," and also "from preventing Schoenthal or other persons from working for the plaintiffs by withdrawing his or their workmen from their employment respectively." The action of the defendants as regards Schoenthal, between whom and his workmen no dispute existed, being held to be wholly illegal and unwarranted.

BREACH OF TRUST—FOLLOWING TRUST FUNDS—SATISFACTION.

*Crichton v. Crichton*, (1896) 1 Ch. 870, is a decision of the Court of Appeal (Lindley, Kay and Smith, L.JJ.), on appeal from North, J., (1895) 2 Ch. 853, noted ante p. 65. Part of the funds of a marriage settlement had been diverted by the husband from the purposes of the trust, and the action was brought by the representatives of the two children of the marriage, against the personal representatives of the grandfather's estate to compel the restoration of moneys which he had diverted from the trusts. It may be remembered that North, J., held that as to £4,801 of stocks which had belonged to the trust in question, but which had been settled on one of the children of the marriage by way of marriage settlement, that child's representatives were precluded from calling for the restoration of that sum. The Court of Appeal, however, found that there was no evidence that the son on whom that sum was settled knew from whence it was derived, or that there was any evidence that his father intended that it should be in any way a satisfaction of any part of his claims under his, the father's, marriage settlement. Notwithstanding therefore that the £4,801 of stocks had been part of the trust funds in question, the representatives of the child on whom it had been settled were held not to be debarred from calling