

important legal questions incidentally raised before it is eminently unsatisfactory. The plaintiff's counsel, in both Courts through which Mr. Monson's effigy has now passed judicially, did not press for a decision in his favour on the ground that the exhibition by one person of an unauthorised representation of the face or figure of another can be restrained by injunction; and this interesting practical question, therefore, remains undetermined. There is, of course, no doubt that the ingenious French artist who drew the face of King Louis after the likeness of an over-ripe pear would have met with as scant consideration from English judges as he received from those of France. It hardly needed Mr. Coleridge's elaborate review of the authorities from the time of Charles II — Sir John Culpepper's pillory, *La Belle et la Bête*, and the rest — to establish the proposition that the exhibition of an effigy is libellous if it is intended to excite hatred, ridicule, or contempt. What we should have liked to know is whether in the opinion of the Courts a person who objects to such permanent publicity as the Tussauds assigned to Mr. Monson is not entitled to have his objection enforced and made effective by due process of law. It is perfectly true that there is no authority for an affirmative answer to this question, for *Pollard v. The Photographic Company*, 58 Law J. Rep. Chanc. 251; L. R. 40 Chanc. Div. 345, turned on contract and property in the negative. But neither is there any authority on the other side. Mr. Justice North's query in that case, 'Do you dispute that if the negative likeness were taken on the sly the person who took it might exhibit or sell copies?' is not even an *obiter dictum*. Our American, and probably also our French, neighbours have already solved this question to some extent, and it is to be regretted that the Courts in the *Tussaud Cases* had not the opportunity of making a precedent on the subject. Other questions of equal importance have also been left open by the Courts in these *causes célèbres*. It must now apparently be taken that the old distinction between trade and other libels in the law of interlocutory injunction no longer exists, although Lord Justice Lopes clung with some tenacity to the opposite view during the argument, and said nothing in his judgment to indicate that he had undergone any change of opinion. But the Court of Appeal are far from unanimous on every other point in the cases. Does *Bonnard v. Perryman*, 60 Law J. Rep. Chanc. 617; L. R. (1891) 2 Chanc. 269—where it was declared by the full Court of Appeal that the