

contained no prohibition, nor was the taking of photographs at the show otherwise forbidden. Horridge, J., who tried the action, held that it could not be maintained, inasmuch as the promoters of the show had not in law any exclusive right of photographing anything at the show and therefore could not assign any such right, but that their possession of the land on which the show was held would have entitled them to make their purported assignment effective, by making conditions as to the admission, and stipulating that no one should enter unless he agreed not to make photographs. The action was therefore dismissed.

COMPANY—ARTICLES OF ASSOCIATION—CONSTRUCTION—ELECTION OF DIRECTORS—NOTICE—DAY OF ELECTION—ADJOURNMENT MEETING—INJUNCTION.

*Catesby v. Burnett* (1916) 2 Ch. 325. This was an action by a shareholder on behalf of himself and all other shareholders of a limited company to restrain the defendants from acting as directors of the company, and the present decision is by Eve, J., on a motion for an interim injunction until the trial. The facts were that the articles of association provided that no one should be elected as director unless written notice of the intention in that behalf was given to the company not less than fourteen clear days before "the day of election" of directors. The ordinary general meeting of the company was held December 10, 1915, at which time the two defendant directors retired by rotation. The report of the directors was not then adopted, and the meeting was adjourned to 10 March, 1916, and a committee of shareholders was appointed to investigate the affairs of the company, and report at the adjourned meeting. On 21 February, 1916, written notice was given to the company by a shareholder, stating that at the adjourned meeting he proposed to move the election of four named directors. On 10 March, 1916, the meeting was held to consider the report and to transact the unfinished business. The chairman ruled the notice of 21 February, 1916, to be out of order, and after declaring the election of auditors, left the chair saying that there was no further business. Subsequently the shareholders appointed a chairman and elected the four persons named in the notice directors of the company. The two former directors having continued to act, the motion was now made to restrain them from so doing until the trial. Eve, J., who heard the motion, granted the injunction holding that the notice