

an application to rectify the register of shareholders of a limited company by striking out the names of the applicants as the holders of 6,334 shares, in the following circumstances: The Olympic Fire & General Re-insurance Co. were issuing 350,000 shares. The Angel Court Trust underwrote and bound themselves to take 150,000 of these shares unless the public took up a certain number of the shares. The Angel Trust then made a subunderwriting agreement with one Pole, whereby Pole agreed to subscribe at par or procure responsible subscribers to the satisfaction of the Angel Trust for 10,000 of the shares and it stated: "We now hand you application for the shares now underwritten by us." There was also a provision for the reduction of their subscription if the public should take a certain number of shares. The agreement also stated: "This contract and our said application shall be irrevocable," and it provided that notwithstanding any withdrawal of authority or repudiation of the contract by Pole, it should be sufficient authority to the directors to allot the shares in question and to enter the name of Pole in the register of members in respect thereof. In the result Pole became liable to take 6,334 shares, which, at the instance of the Angel Trust and under the subunderwriting contract, were allotted to Pole notwithstanding that before the actual allotment Pole notified the Angel Trust that he withdrew his authority. Lawrence, J., held that in the circumstances the authority was coupled with an interest in the Angel Trust and was irrevocable and therefore that the allotment had been properly made notwithstanding the attempted withdrawal of the authority to apply for the shares, and his decision was affirmed by the Court of Appeal (Lord Sterndale, M.R., and Warrington and Younger, L.JJ.).

CLUB—EXPULSION OF MEMBER—OMISSION TO NOTIFY MEMBER OF
COMMITTEE — RESOLUTION — INVALIDITY — CONSTITUTION
OF COMMITTEE.

Young v. Ladies' Imperial Club (1920) 2 K.B. 523. This was an appeal from the judgment of Roche, J. (1920) 1 K.B. 81 (noted ante p. 144), upholding the expulsion of the plaintiff from membership in the defendant club. The notice to the members of the committee of the club authorised to deal with such questions had been sent to all of the members except one who had previously intimated to the chairman that she would be unable to attend the meetings of the committee. Roche, J., held that the omission to notify this member did not invalidate the resolution of expulsion,