

Recent Legal Decisions.

CORPORATION—DESIGNATION—FEDERAL JURISDICTION.—Where a corporation, doing business in a state other than that of its residence or creation, in compliance with a state law designates a person upon whom service of process may be made, it thereby renders itself liable to be sued in the Federal courts within said state, according to the decision of the United States Circuit Court for the district of California, in the case of Gray vs. The Quicksilver Mining Company.

ASSIGNMENT—WAGES TO BE EARNED.—In order to make an assignment of wages to be earned valid it is necessary that there should be at the time of the assignment a subsisting contract out of which they are to accrue, according to the decision of the Rhode Island Supreme Court, in the case of Kennedy vs. Tierney. In the instrument in question in this case an assignment was made, among other things of "all moneys, wages and personal estate whatsoever which I shall or may earn in the employ and which may be in any manner in the hands and possession of any and all other corporations, partnerships or persons whomever during the continuance of the instrument." The court held that so much of the assignment as purported to transfer wages to become due under contracts of employment not subsisting was void, such wages constituting, in the view of the court, a mere possibility uncoupled with an interest and being incapable of assignment.

INSURANCE—ASSIGNMENT—INTEREST.—The case of The Mutual Life Insurance Company of New York vs. Allen et al., decided by the Supreme Judicial Court of Massachusetts on the 25th ult., arose upon a bill of interpleader brought to determine to which of the defendants the proceeds of a policy of insurance upon the life of one Fellows should be paid. It appeared that both Fellows and Allen were residents of Massachusetts, and that the former made an assignment of his policy to the latter as security for a loan. The insurance company claimed that the assignment was not valid, as being against the New York Law, which provides that an insurance policy shall be free from the claims of representatives of a husband or any of his creditors. The Supreme Court, affirming the decision of the court below, gave judgment in favor of Allen, holding that the validity of the assignment was to be determined by the law of Massachusetts, and that it was not necessary to such validity that the assignee should have an insurable interest in the life insured.

CONSTITUTIONAL LAW—PEDDLER'S LICENSE REPEAL.—In 1874 the legislature of Kentucky passed an act providing that "itinerant persons who are citizens of this state, and who vend exclusively goods, wares and merchandise which are the growth, product or manufacture of this state, shall not be deemed peddlers nor be required to take out license." The effect of this provision was discussed in the case of *Rash vs. Holloway*, decided on the 22nd ult., in which the Kentucky Superior Court held that the legislature, having under the constitution no power to impose burdens upon citizens of other states that are not imposed upon citi-

zens of its own state or upon goods manufactured in other states that are not laid upon goods manufactured in its own state, the provision above set forth must be construed as repealing entirely certain provisions of the General Statutes of the state which declare all itinerant persons vending goods, wares and merchandise to be peddlers and require them to procure a license, and that the exemption of the citizens and products of Kentucky operated as an exemption of the citizens and products of all other states as well.

FRAUDULENT ASSIGNMENTS—ATTACHMENT.—An interesting branch of the law relating to fraudulent assignments was discussed in the case of Muser et al. vs. Alexander, decided recently by the General Term of the New York Supreme Court. This was a case in which the defendant, seven months after commencing business on his own account, made a statement to the representative of a mercantile agency to the effect that his assets exceeded by \$15,800 his indebtedness of \$45,000. Two months subsequently he made similar representations respecting his financial condition to the same person. Three days after this second statement he made a general assignment for the benefit of creditors, in which he preferred his wife as creditor for \$8,000 and his brother for \$15,000. At the time of the assignment his assets appeared to be, according to a statement made from the schedule, materially less than his liabilities. It further appeared that the existence of the alleged debts of the appellant to his wife and his brother was inconsistent with statements made to a number of his creditors, as it was with the statements made to the representative of the mercantile agency. It appeared, also, that the appellant's wife evaded efforts made by creditors to examine her before a referee in regard to the existence of the indebtedness to her. Attachments were issued upon the ground that the appellant had removed and disposed of his property with intent to defraud his creditors. The orders granting the attachments were appealed from, but were affirmed by the General Term, which held that sufficient facts appeared to justify the allegations of a fraudulent disposition of property and to warrant the issue of the attachments issued in favor of the creditor.—*Bradstreet's*.

English Wool and its Products.

There are in England some twenty distinct breed of sheep, or nearly double the number fifty years ago. The value of home-grown wool is not so high in England for textile purposes as formerly, and the English sheep which was formerly bred for its fleece is now bred mainly for its flesh. In an interesting article on the subject the *Textile Manufacturer* points out that some breed, such as the Cannock Heath, Delamere Forest, and Norfolk, have become practically extinct, while new ones, such as the Oxfordshire and Hampshire downs, have been formed. The quality of the wool, the same authority states, is usually highest in the Lincoln sheep, which yield a fleece of the long-stapled, bright, coarse wool, used for making the best lustre yarns. The Leicester wool is similar to that of the Lincoln, not so long and

coarse, but of somewhat inferior lustre. The Cotswold carries a heavy fleece of beautifully curled white wool, long in staple and of a lustrous character. The Southdown yields the shortest staple wool of Great Britain; it is close, curly and very fine. The Hampshire down fleece is of average weight and quality and of middle staple, while that of the Oxfordshire down is somewhat long in staple and coarse and hard in quality. The wool of the Rumsey Marsh sheep possesses fineness of fibre, good lustre, and has a curl in the staple giving it the "spring" which is so much prized. The Cheviot fleece is thick, and of short or middle staple. Both of the two latter varieties are valued for their spinning qualities. The wool of the Welsh mountain sheep make the Welsh flannel of Commerce, while that of the Somerset and Dorset horned sheep is manufactured into the fine cloths for which Wiltshire is still noted, although the glory of its woollen trade has long ago departed northwards.

The total annual production of wool in the United Kingdom was, last year, about 91,814,028 lbs., reckoning the average weight of a fleece at 5½ lb. According to the best calculations the average weight of fleece is, in England and Wales 5½ lb., in Scotland 4½, and in Ireland 6 lb., but the average may vary as much as from a quarter to half a pound per fleece, according to season. The import of wool to these Islands was, in 1882, 488,985,057 lb. Of this 263,965,744 lb. was "passed on" to other countries, and 225,019,313 lb. was retained for home manufacture. Nearly three-fourths of the total imports, or 345,784,446 lb. came from Australia. In the year 1819 the export trade from that continent was inaugurated with one fleece. In addition to the quantity of foreign and colonial wool which is exported, about 10,000,000 lb. of British and Irish wool is also sent away. The total quantity, therefore, which is used in home manufactures is 306,833,341 lb.

The price of wool has fluctuated within the past twenty years, during which period only are authentic returns available. On the whole, however, the tendency has been distinctly downwards. In 1854, 2s. 8½d. per lb. was given for wool which this year only fetches 10d. This year's clip, however, is expected to exceed by nearly a million fleeces that of last year, showing that the breeding of sheep, which a few years since seemed declining, has taken an upward bound of considerable impetus.—*Dominion Dry Goods Report*.

Printing Improvements.

Five years is the lifetime of a printing press, under present improvements, for newer and better devices come with such rapidity that the press of which a printing-house is proud to-day becomes quite a second-rate affair at the end of half a decade. Not only are presses becoming faster and faster, but the stereotyping processes are faster and better as well. People who can afford to pay for costly and fast machinery are no longer content with presses that cannot print both sides, cut, fold and deliver 25,000 to 40,000 copies an hour. These are perfecting