

do so, it was not necessary to its validity. The meeting of the 24th February being therefore regular, the resolutions passed at it were held to be valid, and the plaintiff's motion for an injunction failed, and the company's motion to strike out its name as a plaintiff was granted, with costs against Seal as between solicitor and client.

TRADES UNION—STRIKE—PICKETING—INDUCING PERSONS NOT TO CONTRACT WITH PLAINTIFFS—INDUCING WORKMEN TO STRIKE IN ORDER TO INJURE THEIR EMPLOYER'S CUSTOMER—CONSPIRACY AND PROTECTION OF PROPERTY ACT, 1875 (38 & 39 VICT., c. 86) ss. 3, 7—(CR. CODE ss. 523, 524.)

*Lyons v. Wilkins*, (1896) 1 Ch. 811, shows that although the operations of trades unions have been to some extent legalized, there is still a limit beyond which they may not lawfully go. The facts of the case were that a strike had been ordered by the defendants, the secretary and a member of the executive committee of a trades union for the purpose of securing an increase of wages. For the purpose of making the strike effective the plaintiff's works were picketed, that is, certain persons were posted in the neighborhood of the plaintiff's premises, who were furnished with cards requesting those to whom they were delivered to refrain from working for the plaintiffs. The pickets accosted persons on entering and leaving the plaintiffs' premises and endeavored to persuade them not to work for the plaintiffs. The executive committee also endeavored to get one Schoenthal, who was a manufacturer of goods for the plaintiffs, to cease to do work for them, and on failing to do so, they ordered a strike of his workmen. And another man named Scott, who made goods for the plaintiffs, was also threatened with a strike if he did not cease to work for the plaintiffs. The action was brought for an injunction to restrain the defendants from procuring or conspiring to procure persons to break contracts with the plaintiffs, and from inducing or conspiring to induce persons not to enter into contracts with the plaintiffs. On a motion for an interlocutory injunction, North, J., granted the application and restrained the defendants from maliciously inducing or conspiring to induce persons not to enter into the employment of the plaintiffs. On appeal the Court of Appeal (Lindley, Kay