

him. It was rather a case where the intention was to carry out some spite against the man, or had for its object to compel him to pay a debt, or any similar object, not directly connected with the case, against the man, and the defendants were liable to the man for the damage consequently suffered as being an inexcusable interference with the man's ordinary right of citizenship. The case is further noteworthy for holding that a union is liable where the acts done were by persons in the service of and for the benefit of the union, though not directly authorized by it to do as they did.

In the *Glamorgan* case and in *Lyons v. Wilkins* the point established is that even where the honest belief existed that the interests of the men required the objectionable course to be pursued, and although there was not only no intention to injure the plaintiffs, but a belief that the course taken was for their benefit as well, yet if injury ensued the union were liable. Romer, L.J., says (p. 575) that what the defendants have to justify is their action, not as between them and the members of their union, but as between themselves and the plaintiffs the employers. And Stirling, L.J., (p. 578) holds that, although the men persuaded themselves that it was in their master's interest as well as their own that they should have power to take holidays at that period, this was a point on which the masters were entitled to have their own opinion.

VI. *Matters of Excuse.*

Lord Brampton in *Quinn v. Leatham*, dealt with this vexed question of just cause or excuse where a combination of men act in regard to what they consider their mutual interests. He indicates (p. 528) what might protect them, and suggests the following :— (1) Acts done in furtherance of any of the lawful objects of the association as set forth within registered rules; (2) in support of any lawful right of the association or any member of it; (3) to obtain or maintain fair hours of labor or fair wages; (4) to promote a good understanding between employers or employed, and workmen and workman; (5) or for the settlement of any dispute. Lord Lindley in the same case points (pp. 536, 537) to many acts for which no justification exists. They are:—(1) giving a black list; (2) dictating to the plaintiff and his customers and servants what they were to do; (3) disturbing them in their employment of