

In this case the judgment had been recovered against the husband and the wife to be levied, as far as she was concerned, out of her separate estate; but the learned judge held that that could not be treated as a judgment against them jointly; but was in effect a judgment against the husband and against the separate estate of the wife.

TRADE UNION—BOOKS OF ACCOUNTS—INSPECTION—RIGHT TO EMPLOY AGENT TO INSPECT BOOKS OF TRADE UNION—TRADE UNION ACT, 1871 (34-35 VICT., c. 31), s. 14, SCHED. 1, CL. 6 —(R.S.C., c. 125, s. 10, SCHED. 2, CL. 6).

*Norey v. Keep* (1909) 1 Ch. 561. This was an action by the members of a trade union claiming a declaration that the plaintiffs were entitled by their accountant or firm of accountants as their agent or agents to inspect the books of account of the union. The right was claimed under the Trade Union Act, 1871, s. 14, Sched. 1, Cl. 6 (see R.S.C., c. 125, s. 10, Sched. 2, Cl. 6). The defendants had offered to allow the plaintiffs to make a personal inspection but declined to allow their agent to inspect. Parker, J., held that the plaintiffs had the right to employ an agent to make the inspection. He, therefore, held that the plaintiffs were entitled to succeed in the action, but he held that the agent employed by them might be required to give an undertaking that the information derived from the books shall only be used for informing his principals.