Raphael for the services he had rendered, not to Aaron S lomon,
but to the public, the testimonial consisting of a piece of plate and
an address on vellum," but he holds that this did not estop Mr.
Raphael from recovering a more substantial reward from his
deceased client's estate.

ENGLISH CASES.

EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

(Registered in accordance with the Copyright Act.)

PRACTICE—SEPARATE CAUSES OF ACTION—JOINDER OF PLAINTIFFS—RULE 123
—(ONT. RULE 185)—DIRECTORS' LIABILITY ACT, 1890 (53 & 54 VICT.
c. 64), s. 3, s-s. 1—(R.S.O. c. 216, s. 4(1)).

Drincqbier v. Wood (1899) 1 Ch. 393 was an action brought by
four persons, each of whom claimed to have separately purchased
debentures of a limited company on the faith of the statements in
a prospectus and covering letter issued by the defendants as
directors of the company, which statements the plaintiffs alleged
were known by the defendants to be false; and the first point
discussed in the case was whether the plaintiffs could be joined,
each having a separate and distinct cause of action from that of
the others. Byrne, J., decided that they could, because the several
causes of action were the same, and all arose out of the same
transaction, and were against the same defendants. He also held
that where a director of a company is aware that a prospectus
was being issued to the public inviting subscriptions for debentures,
but took no trouble to read it, and abstained from inquiry as to its
contents, and refrained from giving any notice under the Directors'
Liability Act (53 & 34 Vict. c. 64), s. 3, (R.S.O. c. 216, s. 4), it is
too late to repudiate it after action brought against him.

GIFT—EQUITABLE ASSIGNMENT—BANKER's DEPOSIT RECEIPT—INDORSEMENT AND
DELIVERY OF DEPOSIT RECEIPT—DONEE APPOINTED EXECUTOR.

In re Griffin, Griffin v. Griffin (1899) 1 Ch. 408, the validity of
a gift of a banker's deposit receipt is discussed. The holder before
his death had delivered the receipt to his son, and had indorsed on
it "pay my son," and signed his name to the indorsement, and