

## COMMENTS ON CURRENT ENGLISH DECISIONS.

The Law Reports for August comprise (1893) 2 Q.B., pp. 121-225; (1893) P., pp. 209-232; (1893) 2 Chy., pp. 381-530; and (1893) A.C., pp. 205-350.

CRIMINAL LAW—JUSTICES—DISMISSAL OF INFORMATION—COMMITTAL FOR NON-PAYMENT OF COSTS—SUMMARY JURISDICTION ACTS, 1848 AND 1879 (11 & 12 VICT., C. 43, S. 22; 42 & 43 VICT., C. 49, SS. 35, 47).

*The Queen v. Mayor of London*, (1893) 2 Q.B. 146, was an application to quash an order for committal made against a prosecutor whose complaint had been dismissed with costs for non-payment of the costs, on proof that there was no sufficient distress. The complainant had preferred an information against a joint stock company for not keeping a register of members as required by statute. The charge was heard and dismissed with costs, and no sufficient distress being found a judgment summons was taken out, of which the complainant had notice, but he did not appear. At the hearing of the summons it was proved that he had the means, but would not pay, and therefore the order of commitment was made which was sought to be quashed. The company was being wound up, and before the date of the commitment the liquidators had been removed, and no others appointed until after the commitment. It was contended that the proceedings were vitiated because of the change of liquidators, and that they could not properly be continued after the removal of the liquidators, and also that the solicitors of the company had no authority to act pending the removal of one set of liquidators and the appointment of others. The court (Lawrence and Wright, JJ.) overruled the objections, and held that the commitment was rightly made. (See R.S.C., c. 178, ss. 66-70.)

JUSTICES—QUARTER SESSIONS—APPEAL, NOTICE OF—SERVICE ON SOLICITOR—DURATION OF SOLICITOR'S AUTHORITY.

In *The Queen v. Justices of Oxfordshire*, (1893) 2 Q.B. 149, a point of practice is determined of some moment. Notice of appeal from an affiliation order was served upon the solicitor who had acted for the mother in obtaining the order, and such service was accepted by him on her behalf; he notified her of the receipt of the notice, and she subsequently employed another