

CURRENT ENGLISH CASES.

The Law Reports for February comprise (1894) 1 Q.B., pp. 133-271; (1894) P., pp. 13-57; (1894) 1. Ch., pp. 73-230.

DEFAMATION—LIBEL.—CORPORATION, ACTION FOR LIBEL AGAINST—SPECIAL DAMAGE.

South Hetton Coal Co. v. North-Eastern News Association, (1894) 1 Q.B. 133, was an action brought by a joint stock company for libel. The plaintiffs were proprietors of collieries, and owned a number of cottages in connection therewith. The libel complained of charged that these cottages were kept in a grossly unsanitary condition, being for the most part unfit for human habitation. The action was tried by Lord Coleridge, C.J., with a jury. No special damage was proved, and the Chief Justice ruled that the matter discussed in the article complained of was one of public interest, and he, in effect, left it to the jury to say whether the defendants had gone beyond the limits of fair and *bona fide* comment. The jury found a verdict for the plaintiffs for £25. The defendants appealed on the ground that the plaintiffs, being a joint stock company, had no cause of action in the absence of proof of special damage; that no action for libel would lie by a company except for injury to its business, and none was proved; and also, because there was no evidence, that the defendants had exceeded fair and *bona fide* comment. The Court of Appeal (Lord Esher, M.R., Lopes and Kay, L.J.J.) were of opinion that none of the points raised by the defendants were sufficient to defeat the plaintiffs; that although a corporation could not maintain an action for libel in respect of anything reflecting upon them personally, yet they could do so for anything reflecting on their management of their trade or business, without proving any special damage. They also were of opinion that the matter commented on was one of public interest, but that there was evidence from which the jury could properly find, as they had in effect done, that the defendants had exceeded fair and *bona fide* comment.

INTERNATIONAL LAW—FOREIGN SOVEREIGN—JURISDICTION OVER FOREIGN SOVEREIGN—PROOF OF STATUS OF SOVEREIGN.

Mighell v. Sultan of Johore, (1894) 1 Q.B. 149, was an action for breach of promise of marriage, in which the defendant moved