alleged trespasses had been committed, and an injunction to restrain further trespasses. The defendants, who were a company within the jurisdiction, by their defence pleaded that the lands in question were in South Africa and out of the jurisdiction of the court, and the principal question argued was whether the English court had jurisdiction to entertain an action for trespass to land situate in a foreign country, or an action to declare the title to land, or to enjoin the interference with the possession of land situate in a foreign country. A very learned and elaborate judgment of the Divisional Court (Lawrance and Wright, JJ.) was delivered by Wright, J., holding that the court had no jurisdiction to entertain an action against a defendant within the jurisdiction for trespass to land in a foreign country, and also that the court had no jurisdiction to entertain an action for a declaration of title to such land, nor for an injunction restraining interference with the possession of such land. On appeal to the Court of Appeal the plaintiffs abandoned the claim to a declaration of title and an injunction, and as to those branches of the relief claimed the judgment was affirmed; but Fry and Lopes, L.JJ., were of opinion that the court could entertain actions for damages for trespass to land in a foreign country against a defendant who was within the jurisdiction of the court, and as to that branch of the case the judgment of the Divisional Court was reversed, Lord Esher, M.R., dissenting. The case is an interesting one from the elaborate review of the authorities which is to be found in the opinions of the judges; but, as an authority, the case can hardly be regarded as very decisive, inasmuch as the Court of Appeal was not unanimous, and the majority of the judges who passed upon the question were opposed to the conclusion ultimately arrived at. On the point of pleading, whether a plea to the jurisdiction should have alleged the existence of some competent court abroad, the Divisional Court determined that no such allegation was necessary, the plea being based on a general want of jurisdiction of any English court over the subject-matter of the action.

SOLICITOR—SUMMARY JURISDICTION—FAILURE TO PAY MONEY—JUDGMENT RECOVERED BY CLIENT NO BAR TO SUMMARY PROCEEDINGS.

In re Grey (1892), 2 Q.B. 440, was an appeal from a Divisional Court (Grantham and Charles, JJ.) refusing an order against a solicitor for payment of a sum of money within four days, with a view to proceedings to strike him off the rolls in case of default, on the ground that the client had recovered judgment and execution for the amount, which the Divisional Court considered was a bar to summary proceedings. The Court of Appeal (Lord Esher, M.R., and Bowen and Kay, L.JJ.), although of opinion that the fact that judgment had been recovered was a matter to be taken into serious consideration in exercising the summary jurisdiction of the court over a solicitor, in order to protect him from anything like oppression, yet were unanimously of opinion that it was no bar to the exercise of that jurisdiction. Practitioners will do well to make a note of this case in the margin of *Re Fletcher*, 28 Gr. 413, where Blake, V.C., came to the same conclusion as the Divisional Court.