

(Pickford, and Bankes, L.JJ., and Sargant, J.) reversed his decision, Pickford, L.J., and Sargant, J., on the ground that the regulation to which the plaintiff had agreed amounted to a submission within the Arbitration Act, and Bankes, L.J. (doubting that there was any submission within that Act), on the ground that it was a special tribunal set up by Parliament to deal with the question in dispute to which the plaintiff was bound to resort.

STATUTORY ORDER—DATE WHEN IT COMES INTO OPERATION—
ORDER OF FOOD CONTROLLER.

Johnson v. Sargant (1918) 1 K.B. 101, is deserving of notice in that Bailhache, J., holds that where a Food Controller is empowered by statute to make rules and regulations, such rules and regulations do not take effect until after publication or notification to parties affected thereby.

DISTRESS—EXEMPTIONS—VALUE OF EXEMPTIONS LEFT AFTER
DISTRAINT—ONUS OF PROOF—LAW OF DISTRESS AMENDMENT
ACT, 1888 (51-52 VICT. C. 21) s. 4—COUNTY COURTS ACT, 1888
(51-52 VICT. C. 43) s. 147—(R.S.O. C. 80, s. 3 (f); c. 155, s. 30 (1).

Gonsky v. Durrell (1918) 1 K.B. 104. This was an action for wrongfully distraining a tool of the tenant in contravention of the Law of Distress Amendment Act, s. 4 (see R.S.O. c. 155, s. 30 (1)). The privilege attaching to tools of trade is to the value of £5 (in Ontario it is to the value of \$100), and it consequently became necessary to shew that the tenant was not left in possession of exempted tools of trade to the extent of £5. The action was tried in a County Court and the judge gave judgment for the defendant on the ground that the onus was on the plaintiff to shew that the defendant did not leave on the demised premises goods to the amount exempted, which onus he had failed to satisfy; and a Divisional Court (Darling, Avory, and Sankey, JJ.) affirmed this decision.

CRIMINAL LAW—FORTUNE TELLING—EVIDENCE OF BONA FIDES—
INTENT TO DECEIVE—VAGRANCY ACT, 1824 (5 GEO. 4, C. 83)
s. 4—(CR. CODE S. 443).

Davis v. Curry (1918) 1 K.B. 109. The defendant was convicted of pretending to tell fortunes. Evidence was offered at the trial that the defendant had an honest belief that she possessed some power which enabled her by holding an object to tell the thoughts of the person to whom it belonged, but the magistrate