

with a denial of liability, if the plaintiff does not accept the money paid in, but proceeds to a trial and recovers less than the amount paid in, he shall not be entitled to the costs of the issue of liability. The present action was brought to recover damages for personal injuries caused by negligence of the defendants. The defendants denied liability, and paid into Court a sum of money in satisfaction, this the plaintiff refused to accept, and proceeded to trial, and established the negligence, but failed to recover as much as the amount paid in; Laurence, J., who tried the action, gave the defendant his costs of the action subsequent to the payment into Court, but the Court of Appeal (Eady, Phillimore and Bankes, L.JJ.) held that there was no jurisdiction under the above mentioned Rule to order the plaintiff to pay the costs of the issue on which he had succeeded, and the order as to costs was modified accordingly.

ALIEN—NATURALIZATION—PRIVY COUNCILLOR — REPEAL BY IMPLICATION—ACT OF SETTLEMENT 1700 (12-13 W. 3, c. 2) s. 3—NATURALIZATION ACT 1870 (33-34 VICT. c. 14) s. 7—BRITISH NATIONALITY AND STATUS OF ALIENS ACT 1914 (4-5 GEORGE V. c. 17) s. 3.

*The King v. Speyer* (1916) 2 K.B. 858. In this case the question was whether a foreigner naturalized under the Naturalization Act 1870 (33-34 Vict. c. 14) was competent to be a Privy Councillor, or whether the prohibitory section of the Act of Settlement (12-13 W. 3, c. 2) s. 3 was still in force. The Divisional Court (1916) 1 K.B. 595 held that the prohibition in the Act of Settlement had been impliedly repealed and therefore that an alien naturalized under the Naturalization Act of 1870 was now competent to be a Privy Councillor, and this decision is now affirmed by the Court of Appeal (Eady, Phillimore and Bankes, L.JJ.).

PHOTOGRAPH—RIGHT TO TAKE PHOTOGRAPHS IN EXHIBITION OPEN TO PUBLIC.

*Sports & General Press Agency v. "Our Dogs" Co.* (1916) 2 K.B. 880. The promoters of a dog show, to which the public were admitted by ticket, purported to assign to the plaintiffs the sole right to take photographs of the exhibits, and this action was brought to restrain the defendants from infringing this alleged right by publishing photographs they had taken at the show of animals exhibited thereat. The tickets of admission