

property notwithstanding any restraint against anticipation; but this Act was held not to enable the court to vary any order made prior to its passing.

COMPANY—GENERAL MEETING—CHAIRMAN.

In *National Dwellings Society v. Sykes*, (1894) 3 Ch. 159, the power and duties of a chairman presiding at a general meeting of the shareholders of a company are discussed by Chitty, J., and his decision is useful, not only as defining the powers and duties of a chairman in this particular case, but as also furnishing a guide for determining the proper functions of the chairman of a meeting in all cases. He holds that it is his duty to preserve order, conduct the proceedings regularly, and to take care that the sense of the meeting is properly ascertained with regard to any question before it, but that he has no power arbitrarily to stop or adjourn the meeting of his own will; and if he purports to do so it is competent for the meeting to elect another chairman to proceed with the business before it.

INJUNCTION—NUISANCE—NOISE CAUSED BY TWO OR MORE PERSONS.

*Lambton v. Mellish*, (1894) 3 Ch. 163, was an action to restrain a nuisance caused by the noise made by an organ used by the proprietor of a merry-go-round on his premises. There was a similar action against another proprietor of another merry-go-round. One of the organs was much louder than the other, and could be heard at a much greater distance. Both organs were kept going from 10 a.m. to 6 or 7 p.m., and the noise was "maddening," as one might well believe. The defendant who used the less noisy organ thought that he was within his rights, and that no injunction should be granted against him; but Chitty, J., held that both defendants were responsible for the noise as a whole, so far as it constituted a nuisance to the plaintiff, and each must be restrained in respect of his own share in making the noise, and an interim injunction was granted in both actions.

PRACTICE—SERVICE—NOTICE OF MOTION FOR ATTACHMENT FOR NOT FILING ACCOUNTS—ORDS. XL., R. 2; LXVII., R. 4—(ONT. RULES 879, 1330).

*In re Bassett, Bassett v. Bassett*, (1894) 3 Ch. 179; 8 R. 132, North, J., refused to entertain a motion for an attachment against a defendant for not bringing in accounts upon a reference,