BRITISH NORTH AMERICA ACT, s. 92, sub-s. 16—Manitoba Liquor Act 1900—Powers of local legislature—Prohibition of sale of liquor.

In *Attorney-General of Manitoba* v. *Manitoba License Holders' Association* (1902) A.C. 73, the Judicial Committee of the Privy Council (Lords Hobhouse, Macnaghten, Davey, Robertson and Lindley) have decided that the recent Manitoba Liquor Act is intra vires of the local legislature under the B.N.A. Act, s. 92, sub-s. 16. This decision has been so much canvassed that it is not needful to say more concerning it here.

PRACTICE—Criminal conviction—Special leave to appeal.

Ex p. Aldred (1902) A.C. 81, was a special application for leave to appeal to the Judicial Committee of the Privy Council from a conviction of the defendant for being party to the issue of false balance sheets by a limited company. The conviction was founded on the verdict of a jury, and the Judicial Committee (the Lord Chancellor and Lords Hobhouse, Macnaghten, Davey, Robertson and Lindley) being of opinion that there was evidence on which the jury could properly find the verdict they had, and that there was no special matter sufficient to countervail it, refused the application.

COMPANY—Powers of company—Formation and investment of reserve fund—27 & 28 Vict. c. 23 (D.)—Practice—Parties—Purchase by director and resale to company at a profit.

Burland v. *Earle* (1902) A.C. 83, was an appeal from the Ontario Court of Appeal in *Earle* v. *Burland*, 27 Ont. App. 540, in which the Judicial Committee of the Privy Council (Lords Hobhouse, Davey, Robertson and Sir R. Couch) made a material variation in the judgment appealed from. The action was by some of the shareholders of a company incorporated under the Dominion Act, 27 & 28 Vict., c. 23, to control the right of the directors to accumulate out of the profits of the company a reserve fund beyond what was reasonably necessary to provide for the vicissitudes of business. The Court of Appeal considered that the plaintiffs were entitled to relief, but the Judicial Committee have come to the conclusion that the Court has no jurisdiction to interfere with the internal management of a company acting within its powers. Their Lordships concede that while a company must prima facie bring an action to redress a wrong done to itself, yet if a majority of the shares are controlled by those against whom relief is sought,