

he had jurisdiction to remove the guardian appointed by the mother if he should think it for the welfare of the children so to do, and that if it were necessary to exercise that jurisdiction he could do so, notwithstanding the infants were not wards of court.

MASTER AND SERVANT—CLERK—INJUNCTION TO RESTRAIN FORMER SERVANT FROM COMMUNICATING INFORMATION GAINED DURING HIS SERVICE—TRADE SECRETS.

*Merryweather v. Moore* (1892), 2 Ch. 518, was an application for an interim injunction. The defendant had been formerly apprenticed to the plaintiffs, and after completing his apprenticeship was retained in their employment as a paid clerk, but ultimately left their service. Two days before leaving he compiled for his own purposes, and without the plaintiffs' knowledge or consent, a table of the dimensions of various types of engines made by the plaintiffs, and this table he had in his possession when he entered the service of his new employers, who subsequently exposed for sale an engine of, it was said, corresponding dimensions to one manufactured by plaintiffs, although this was denied. Kekewich, J., granted the interim injunction, holding that the compilation of the table under the circumstances was a breach of confidence, and that its publication, or the communication of its contents, ought to be restrained until the trial.

## Notes and Selections.

THE *American Law Review* in its last number starts off with a fulsome article on the Hon. W. E. Gladstone, apropos of nothing in particular, written by some ardent admirer of his in England. The Americans are, as a rule, great admirers of that very clever old gentleman, though one of the best informed and far-sighted men among them has stated that he is "the most pernicious man that England has seen for the last 300 years." However, we do not quite see what his political success or otherwise has to do with legal matters. The other articles are: Law and legislation; the concluding portion of the address of Hon. John F. Dillon delivered at the last meeting of the American Bar Association; the validity of contracts and franchises held by quasi-public municipal corporations; English constitutional theories; the proper course of study for American Law Schools, etc.—a bill of fare very theoretical in its character. The notes of recent decisions give to the practising lawyer something of more value.

THE *Albany Law Journal* comments wittily and caustically upon the Columbus craze that is now afflicting the United States, limiting it to that country "because no other part of the western continent seems to take any pride or interest in Columbus." The text for these remarks is the case of *Hampden v. Walsh*, 1 Q.B.Div. 189, which was an action against a stakeholder in reference to