

vent, or supposed to be so, and that, therefore, notices of withdrawal given, or which matured, after the society was known to be insolvent, though before a winding-up order had been made, conferred no right to priority of payment on the members so attempting to withdraw.

MANDAMUS—REGISTRATION OF STOCK—JOINT OWNERSHIP BY CORPORATION AND INDIVIDUAL.

*Law Guarantee Co. v. Bank of England*, 24 Q.B.D., 406, was an action for a mandamus to the Bank of England to compel the registration of a corporation and an individual as joint owners of certain stock in the public funds. The bank resisted the action on the ground that a corporation and an individual cannot by law hold either real estate or chattels as joint tenants, but only as tenants in common, because they take in different capacities, and there can be no survivorship; and that, therefore, on the death of the individual the bank could not allow the corporation to transfer the stock without investigating the title of the deceased's representatives, and obtaining their concurrence, which was an obligation the bank was not bound to undertake. As was said by the counsel for the bank, the question was one of importance, not only to the bank, but to all public bodies which keep registers of stocks or shares. Mathew, J., sustained the defendant's objection, and refused the mandamus.

CRIMINAL LAW—CONSPIRACY TO PROCURE ABORTION—24 & 25 VICT., c. 100, s. 58—(R.S.C., c. 162, s. 47.)

In *Reg. v. Whitchurch*, 24 Q.B.D., 420, a case was stated by Wills, J., for the opinion of the Court. Whether a woman, believing herself to be pregnant, but not being so, who conspires with others to administer drugs to herself and use instruments on herself with intent to procure abortion, is liable to conviction for a conspiracy to procure abortion. The Court (Lord Coleridge, C.J., Pollock, B., Hawkins, Grantham, and Charles, JJ.) unanimously answered the question in the affirmative. It may be observed that the Act 24 & 25 Vict., c. 100, s. 58 (R.S.C., c. 162, s. 47) only makes it a crime for a woman to use drugs or instruments on herself to procure abortion provided she is with child; but in the case of other persons it is a crime to use drugs or instruments for the purpose of procuring abortion whether the woman is with child or not, and as Hawkins, J., put it, "It is clear that she could not lawfully call in other persons to do that which when done by them is a crime punishable by penal servitude."

CRIMINAL LAW—PREVIOUS CONVICTION—SUMMARY CONVICTION FOR ASSAULT—SUBSEQUENT INDICTMENT FOR SAME ASSAULT.

In *Reg. v. Mills*, 24 Q.B.D., 423, the prisoner was indicted for assault, to which he pleaded that he had been summarily convicted for the same offence and discharged on giving security for good behavior, and the Court (Lord Coleridge, C.J., Pollock, B., and Hawkins, Charles, and Grantham, JJ.) were of opinion that the plea was a good answer.

CRIMINAL LAW—LARCENY OF LETTER—POST OFFICE—CAUSING POSTMAN TO INTERCEPT LETTER—LIABILITY AS PRINCIPAL OR ACCESSORY.

The present number is somewhat rich in criminal cases. In *Regina v. James*, 24 Q.B.D., 430, the question was whether a person who induced a postman to