

ordered the stay in the present case, on the ground that it appeared that the plaintiff had used the process of the Court vexatiously and oppressively.

BIOCYCLE—ARREST OF RIDER—NEGLECT TO CARRY LAMP.

Hatton v. Treeby (1897), 2 Q.B. 452, is a decision on a case stated by justices. By the Local Government Act, 1888, persons riding bicycles at night are required to carry lights. The complainant was riding a bicycle at night without a light and the defendant, a constable, had called on him to stop, and, upon his refusing to do so, had caught hold of the handle bar whereby the complainant was thrown to the ground, and the complainant thereupon summoned the constable for assault. The justices found that the constable did not know the name and address of the complainant, and could not have ascertained them without stopping him, and that in so stopping him he used no more force than was necessary, and they were of opinion that as the complainant was committing an offence punishable on summary conviction, within view of the constable, he was justified in doing as he did, and they dismissed the complaint, subject to the opinion of the Court on the case stated. The Divisional Court (Collins and Ridley, J.J.), however, were of opinion that as the Act gave no power to apprehend without warrant a person committing a breach of its provisions, the act of the constable was illegal, and the appeal was allowed.

FIXTURES—MOVABLE CHATTELS—ANNEXATION TO FREEHOLD—STUFFED BIRD COLLECTION.

In *Hill v. Bullock* (1897) 2 Ch. 482, the Court of Appeal (Lindley, Lopes and Chitty, L.J.J.), have affirmed the decision of Kekewich, J. (1897), 2 Ch. 55 (noted ante vol. 33, p. 656), holding that a collection of stuffed birds attached to movable wooden trays placed in iron glass fronted cases affixed to the walls of a mansion house, were not to be treated as annexed to the freehold, but were movable chattels, and did not pass to a tenant for life of the mansion.