

"if any society under this Act receives loans or deposits in excess of the limits prescribed by this Act, the directors or committee of management of such society receiving such loans or deposits on its behalf shall be personally liable for the amount so received in excess." The secretary of the society received deposits in excess of the limit fixed by the Act, and appropriated to his own use a great part of the money deposited, and he so managed the books of the society as to keep the directors in ignorance that the limit had been exceeded. The action was brought by a depositor whose deposit was made after the limit had been reached against the directors, and the Court of Appeal (Lord Halsbury, L.C., Lord Esher, M.R., and Fry, L.J.), affirming Mathew, J., held that every director who was a member of the board when the deposit was made was personally liable for the amount deposited.

TROVER—CONVERSION OF CHATTELS—SALE BY AUCTION ON PRIVATE PREMISES—AUCTIONEER, LIABILITY OF, TO RIGHTFUL OWNER.

*Consolidated Co. v. Curtis* (1892), 1 Q.B. 495, was an action brought against an auctioneer for the conversion of goods of which plaintiffs were the rightful owners, the conversion consisting in selling them by auction and delivering them to purchasers on the premises of the person who had previously assigned them to the plaintiffs by bill of sale, of which the defendants had no notice. The defendants contended that they were not liable, relying on *Turner v. Hockey*, 56 L.J. Q.B. 301, where, according to the headnote of the case, the precise point was determined. Collins, J., however, held that the plaintiffs were entitled to succeed, and pointed out that although there are expressions in the judgment of Day, J., which seem to support the proposition stated in the headnote of that case, still it goes beyond the point actually decided, as it would appear from the report that there the defendants, instead of themselves selling the goods in question, merely communicated an offer, which was accepted by the person wrongfully assuming to be the owner of the chattels. He therefore held that case not to govern the present, and followed the decision of Romer, J., in *Barker v. Furlong* (1891), 2 Ch. 183 (noted *ante* vol. 27, p. 395).

DEFAMATION—SLANDER—COUNTY COUNCIL—PRIVILEGED OCCASION—NOTICE OF ACTION—"ANYTHING DONE."

*Royal Aquarium Society v. Parkinson* (1892), 1 Q.B. 431, was an action brought against a member of the London County Council to recover damages for defamatory words spoken by the defendant at a meeting of the council concerning an application of the plaintiffs for a license to carry on a place of amusement. The defendant contended that the occasion was absolutely privileged, or if not absolutely privileged it was at all events privileged, in the absence of express malice; and also that he was entitled to notice of action. The jury at the trial gave a verdict for the plaintiff, and the defendant then moved for judgment, notwithstanding the verdict, or for a new trial. The Court of Appeal (Lord Esher, M.R., Fry and Lopes, L.J.), refused the motion, and held that the occasion was not absolutely privileged, and that the council was not a court within the rule by which defamatory statements before a court are absolutely privileged; and