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The Judicial Committee of the Privy Council, in the recent case of *Huntingdon v. Attrill*, 8 Times Law Reports, 341, paid the United States Supreme Court the compliment of adopting a definition enunciated by the latter tribunal. The question having arisen as to the proper test of whether or not an action is "penal" within the meaning of the well-known rule of private international law which prohibits one State from enforcing the penal law of another, their lordships adopted "without hesitation" that prescribed by Mr. Justice Gray in *Wisconsin v. Pelican Insurance Company* (127 U.S. 20 Davis, at p. 265): "The rule that the Courts of no country execute the law of another applies not only to prosecutions and sentences for crimes and misdemeanors, but to all suits in favour of the State for the recovery of pecuniary penalties for any violation of statutes for the protection of its revenue or other municipal laws, and to all judgments for such penalties."

Mr. Kenelm E. Digby, who has appeared before the Judicial Committee of the Privy Council in numerous Canadian cases, including the *cause célèbre* respecting taxes on commercial corporations, has been appointed by the Lord Chancellor to be judge of the County Courts for Derbyshire. The *London Law Journal* says:—"No