CRIMINAL LAW—QUARTER SESSIONS—POWER OF QUARTER SESSIONS TO BIND CONVICT TO APPEAR FOR SENTENCE—RECOGNIZANCE TO APPEAR FOR SENTENCE—BREACH OF CONDITION—INHERENT JURISDICTION OF QUARTER SESSIONS.

The King v. *Spratling* (1911) 1 K.B. 77 may be shortly noticed for the fact that the Court of Criminal Appeal (Lord Alverstone, C.J., and Pickford, and Coleridge, JJ.) held, on a case stated, that a court of quarter sessions has inherent jurisdiction to bind over a person convicted at the sessions, to appear for sentence when called on, and to inflict sentence in case of breach of the recognizance.

SOLICITOR—REGISTRAR OF COUNTY COURT—DEFENDANT IN PERSON—REGISTRAR ACTING AS DEFENDANT IN PERSON IN HIS OWN COURT—TAXATION BY REGISTRAR OF HIS OWN COSTS—COSTS OF SOLICITOR DEFENDANT ACTING IN PERSON.

Tolputt v. *Mole* (1911) 87 is an illustration of the exception to the general rule that a judge who has an interest in the result of a suit is disqualified from acting, the exception being "in cases of necessity where no other judge has jurisdiction." By the County Courts a registrar who is a solicitor is debarred from practising as a solicitor in his own court. In the present case the defendant was a solicitor and was registrar of the court in which he was sued. He appeared in person and successfully defended the action and was awarded costs, which as Registrar of the court be taxed. An appeal was had from his taxation on the ground that being himself the litigant he was debarred from acting as taxing officer of his own costs, and should have appointed a deputy, or requested the judge to tax the costs. The Divisional Court (Phillimore, and Avory JJ.) held that he was not under any obligation to incur the expense or obligation of getting any other person to act, and that he being the only officer having jurisdiction he was entitled to tax the costs himself. The case also deals with the question as to what items of costs a solicitor defendant is entitled to be allowed, where he acts in person.

COMPANY—FRAUDULENT PROMOTER—DEBENTURE ISSUE—SECRET PROFIT.

In re Darby (1911) 1 K.B. 95. When the limited company system was devised it was probably not anticipated that it would