

be sued on behalf of the Crown, does not give the Crown immunity from all law or authorize the interference by the Crown with private rights at its own mere will. There is a well-established practice in England, in certain cases where no petition of right will lie, under which the Crown can be sued by the Attorney-General, and a declaratory order obtained, as has been recently explained by the Court of Appeal in *Dyson v. Attorney-General* (1911) 1 K.B. 410, and in *Burghes v. Attorney-General* (1912) 1 Ch. 173. It is the duty of the Crown and every branch of the Executive to abide by and obey the law. If there is any difficulty in ascertaining it, the Courts are open to the Crown to sue, and it is the duty of the Executive, in cases of doubt, to ascertain the law, in order to obey it, and not to disregard it. The proper course in the present case would have been either to apply to the Court to determine the question of construction of the contract, and to pay accordingly, or to pay the whole amount over to the receiver, and to obtain from the Court an order on the receiver to pay the sums properly payable for labour and supplies. . . . The decision of the Supreme Court was, therefore, reversed. We have dwelt on this case at more than usual length because of its very great importance in defining the duty of the Executive Government, in regard to the rights of parties, in matters in litigation. It affords another striking instance of the value of the right of appeal to His Majesty in Council.

TRADE UNION—CONSPIRACY—PROCURING BREACH OF CONTRACT BY EMPLOYER—DISPUTE BETWEEN EMPLOYER AND OTHER EMPLOYERS—INTERVENTION OF TRADE UNION.

Larkin v. Long (1915), A.C. 814. This was an action brought by the plaintiff Long against Larkin and others for conspiracy to induce the plaintiff's employees to break their contracts for service with the plaintiff. The plaintiff was a stevedore, and, in the transaction of his business, hired dock labourers, all of whom were members of a trade union called the Irish Transport Union. The other stevedores of the port agreed to form an employers' association for the purpose of obtaining higher rates from the shipowners, but the plaintiff refused to join it. The association was promoted by the secretary of the Irish Transport Union, and he promised the association that he would see that no member of the Transport Union worked for any stevedore who was not a member of the association. Three officials of the union and three members of the Stevedores' Association agreed to force the plaintiff to join the association, and, in pursuance of