

Prize Court—Enemy merchant ship in British port at outbreak of war—Seizure—Detention—Days of grace—Hague Convention No. VI. of 1907—Absence of reciprocity—Condemnation.

The *Marie Leonhardt* (1921), P. 1. This was an application for the condemnation of a German merchant ship which was seized in a British port on the outbreak of the late war. It was contended on behalf of the owners that under the Hague Convention No. VI. of 1907 the vessel was entitled under international law to a certain number of days of grace in which to leave after the outbreak of war; but Duke, P.P.D., held that this was a mere act of grace and dependent on whether the enemy State allowed reciprocal privileges to British ships in its ports, and as in this case Germany had refused to accord similar privileges to British ships, the vessel in question must be condemned as a prize, and he so decided.

Trade union—Trade dispute—Conspiracy—Compelling workman to join shop union—Threat to strike on refusal—Coercion of employers—Dismissal without notice—Breach of contract.

*White v. Riley* (1921), 1 Ch. 1. This was an action by a non-union workman against members of a trade union to restrain them from using threats and coercion of the plaintiff's employer to dismiss him from his employment. It appeared that in order to induce the plaintiff to become a member of the union the defendants, who were fellow-employees of a firm, had threatened that if the plaintiff were retained in his employment the defendants would strike. Astbury, J., who tried the action, held that the defendants had conspired to injure the plaintiff by obtaining his dismissal, and gave judgment in his favour for £75. The Court of Appeal (Lord Sterndale, M.R., and Warrington and Younger, L.JJ.) held, following the decision of Lords Watson, Herschell and Macnaghten in *Allen v. Flood* (1908), A.C. 1, 96, 98, 129, 147, 148, that the acts of the defendants did not constitute an unlawful threat, and were not therefore actionable.