

they requested the defendants to have the shares registered in the names of two nominees of the defendants which was done. They remained in the hands of the defendants. Inchbald & Son were convicted of fraud and forgery. The defendants claimed to retain the certificates as bona fide purchasers for value without notice, and they claimed that the plaintiff was estopped from setting up his title as against the defendants. Pickford, J., who tried the action, held that the plaintiff, having left the certificates in Inchbald & Son's hands in such a condition as to convey a representation to any person who took them from Inchbald & Son, that they had authority to deal with them, was thereby stopped from setting up his title as against a bona fide transferee thereof for value without notice.

PRACTICE—EQUITABLE EXECUTION—RECEIVER.

Morgan v. Hart (1914) 2 K.B. 183. In this case the Court of Appeal (Buckley and Phillimore, L.JJ.) decide (overruling Scrutton, J.) that under the Judicature Act the Court has no jurisdiction to appoint a receiver by way of equitable execution, except in cases in which execution cannot be levied in the ordinary way, by reason of the nature of the property sought to be made available and in which the Court of Chancery, before the Judicature Act, would have had jurisdiction to make such an order.

CRIMINAL LAW—OBTAINING MONEY BY FORGED INSTRUMENT—
FRAUDULENT LETTER ASKING FOR MONEY TO BE PAID TO
BEARER—FORGERY ACT, 1913 (3-4 GEO V, c. 27), s. 7
(R.S.C. c. 146, s. 467).

The King v. Cade (1914) 2 K.B. 209. The defendant was indicted for obtaining money by means of "a certain forged instrument, to wit a forged request for the payment of one pound." The document in question was a letter purporting to come from, and to be signed by, a man employed by the prosecutor to whom it was addressed. The letter requested the prosecutor to hand to the bearer the sum of £1 which the letter stated was required for the purpose of hiring a machine to clear out a drain on the prosecutor's premises. It was held by the Court of Criminal Appeal (Lord Reading, C.J., and Ridley and Rowlatt, JJ.) that the letter was an "instrument" within the meaning of s. 7 of the Forgery Act, 1913 (3-4 Geo. V, c. 27). See R.S.C. c. 146, s. 467.