

five cases in which the courts of this country consider a defendant bound by a judgment obtained against him in a foreign court. There are (1) where he is a subject of the foreign country in which the judgment has been obtained; (2) where he was resident in the foreign country when the action began; (3) where the defendant in the character of plaintiff has selected the forum in which he is afterwards sued; (4) where he has voluntarily appeared; (5) where he has voluntarily contracted to submit himself to the forum in which the judgment was obtained.

The English and Canadian authorities on actions on foreign judgments have been reviewed in an annotation in 9 D.L.R. 799, which it would be well to refer to in connection with the above.

THE CASE OF LARKIN.

There have been times in English history when such interference with the course of justice as has lately taken place in the City of Dublin would have caused the Minister responsible for it to lose, possibly not his head, but certainly his office.

It is not so now, for a Minister backed by a majority in the House of Commons may apparently do anything he pleases without remonstrance from a public which has become so lethargic through the blows dealt upon the constitution in recent years, that any action may pass without comment.

This man Larkin, an anarchist and a professional agitator, was recently convicted and sentenced to seven months' imprisonment, not for any interference with questions affecting trade unions but of sedition and of inciting to riots which might and actually did result in bloodshed. His conviction took place in an ordinary court of justice under the ordinary forms of law and presented no feature to justify executive clemency; yet, simply in obedience to the clamour of a mob, which for weeks had terrorized the city of Dublin, the executive remitted the very light sentence imposed upon him and liberated him from jail. The result of this action may easily be imagined and is already bringing forth fruit.