

## ENGLISH CASES.

## EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

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**PRACTICE—TRADE UNION—ACTION BY, OR AGAINST.**

In *The Tuff Vale Ry. Co. v. Amalgamated Society of Railway Servants* (1901) 1 Q.B. 170, the Court of Appeal (Smith, Collins and Stirling, L.JJ.) determined that in the absence of incorporation, or statutory authority in that behalf, a private association of persons, in this case a trade union, cannot be sued, in the registered name of such association. The mere fact that the Legislature authorizes the registration of such associations implies no right or liability to sue, or be sued, by the registered name. The name of the society was therefore ordered to be struck out, and an injunction which had been granted against it was dissolved.

**GAMING—OFFICE USED FOR BETTING—"COUPON COMPETITION"—EVENTS RELATING TO HORSE RACES—BETTING ACT 1853, (16 & 17 VICT., c. 119, s. 1, (CR. CODE SS. 204, 205).**

In *The Queen v. Stodderdt* (1901) 1 Q.B. 177, the defendant was prosecuted for keeping an office for the purpose of money being received by her and on her behalf as the consideration for undertakings to pay thereafter money on events relating to horse races. The modus operandi was as follows: The defendant was proprietor of a newspaper published weekly at her office. Each number of the paper contained a notice of what was called a "coupon competition," which was a promise by the defendant to pay a specified sum of money to such persons as should correctly guess the result of certain horse races about to be run, and should write their guesses on certain forms called "coupons" which were issued with each number of the paper and should return the coupons so filled up to the defendant's office together with a penny in respect of each guess. Several persons every week sent in to the defendant's office coupons and money. This was held to be an infraction of the Betting Act 1853 (16 & 17 Vict., c. 119) s. 1. It would also seem to come within the Cr. Code s. 204, although that section is not in the same terms as the English Act.