

bill for the purpose of taxation, and an account of cash received, which application Thomas resisted on the grounds above mentioned, but the Court of Appeal (Lindley, Kay, and Smith, L.JJ.) indignantly scouted the idea that a solicitor could shield himself under any such defence, and asked, very pertinently: "Is every rascally solicitor to invoke his own rascality as a ground of immunity from the jurisdiction of the court? Or is the court to listen to a solicitor who, after acting for and advising his client, and taking his money, is mean enough to denounce him and set up the illegality of the client's conduct as a reason why the court should not call its own officer to account?"

MEDICAL PRACTITIONER—REMOVAL OF NAME FROM REGISTER—"INFAMOUS CONDUCT IN A PROFESSIONAL RESPECT"—DOMESTIC FORUM—PERSONAL INTEREST OF MEMBER OF TRIBUNAL—MEDICAL ACT (21 & 22 VICT., c. 90), ss. 28, 29 (R.S.O., c. 15, ss. 34, 35).

In *Allison v. General Council of Medical Education*, (1894) 1 Q.B. 750, the plaintiff sought an injunction to restrain the defendants from removing his name from the register of medical practitioners, pursuant to the finding of the General Council that he had been guilty of "infamous conduct in a professional respect," and directing, in consequence, the removal of his name from the register. The court was asked to review the finding of the domestic tribunal on the facts. It was proved that the plaintiff had published advertisements in newspapers containing reflections on medical men generally and their method of treatment, and advising the public to have nothing to do with them or their drugs, but to apply to the plaintiff for advice, giving his address and the fee which he charged. The Court of Appeal (Lord Esher, M.R., Lopes and Davey, L.JJ.) agreed with Collins, J., that on that evidence the General Council might reasonably find that the plaintiff had been guilty of "infamous conduct in a professional respect," and that, being so, a court of law could not review its decision; and that the Council would be justified in finding any act done by a practitioner which would be reasonably regarded as disgraceful and dishonourable by his professional brethren of good repute and competency to come within the category of "infamous conduct in a professional respect." One other point in the case arose out of the fact that the proceedings against the plaintiff were instituted and carried on by a society known as the Medical Defence Union. One of the members of the General