

within the meaning of an Act (5 Geo. 4) giving a right to the defendants to collect tolls 'on certain specified vehicles' or other carriage hung on springs" passing over the defendants' bridge. Wright, J., held that the bicycle in question was "a carriage hung on springs," but that it was not a carriage liable to toll under the Act, because the carriages within the contemplation of the Act were carriages drawn by horses or other beasts. The Court of Appeal (Lord Halsbury, L.C., and Lord Alverstone, C.J., and Jeune, P.P.D.) affirmed his decision, at the same time approving of the decision in *Taylor v. Goodwin*, 4 Q.B.D. 228, where it was held that a bicycle was a carriage for the purpose of an Act against furiously driving a carriage. The Lord Chancellor in the course of his judgment says: "The broad principle of construction put shortly must be this: What would, in an ordinary sense, be considered to be a carriage (by whatever specific name it might be called) in the contemplation of the Legislature at the time the Act was passed? If the thing so sought to be brought within the Act would substantially correspond to what the Legislature meant by a carriage (called by whatever name you please) I think that the tax would apply; but if not, it is not for the Court to make an effort by ingenious subtleties, to bring within the grasp of the tax something which was not intended in substance by the Legislature at that time to be the subject of taxation."

CRIMINAL LAW—TREASON—MOTION TO QUASH INDICTMENT FOR SWEARING ALLEGIANCE IN TIME OF WAR—NATURALIZATION IN ENEMY'S COUNTRY IN TIME OF WAR—NATURALIZATION ACT, 1870 (33 & 34 VICT., C. 14) S. 6.

In *The King v. Lynch*, (1903) 1 K.B. 444, a motion was made at the trial to quash an indictment for treason which the Court refused to entertain, but left the prisoner to his remedy by motion in arrest of judgment, or by writ of error. The trial having proceeded, the prisoner claimed to be protected by virtue of the Naturalization Act, 1870 (33 & 34 Vict., c. 14) s. 6, which provides that "any British subject who has at any time before, or may at any time after the passing of this Act, when in any foreign state and not under any disability, voluntarily become naturalized in such state, shall from and after the time of his so having become naturalized in such foreign state be deemed to have ceased to be a British subject and be regarded as an alien." It appeared in evidence that the prisoner in January, 1900, being then a British