

ENGLISH CASES.

EDITORIAL REVIEW OF CURRENT ENGLISH
DECISIONS.

(Registered in accordance with the Copyright Act.)

The Law Reports for March comprise (1897) 1 Q.B., pp. 245-432; (1897) P. pp. 57-64; and (1897) 1 Ch., pp. 193-324.

MUNICIPAL LAW—PROHIBITION OF OBSCENE OR PROFANE LANGUAGE—BY-LAW FOR "GOOD RULE AND GOVERNMENT," AND "PREVENTION AND SUPPRESSION OF NUISANCES"—VALIDITY OF BY-LAW.

In *Mantle v. Jordan*, (1897) 1 Q.B. 248, a municipal corporation having statutory power to pass by-laws inter alia for "good rule and government," and "the prevention and suppression of nuisances" passed a by-law that "no person shall, in any house, building, garden, land or other place abutting on, or near to, a street or public place, make use of any violent, abusive, profane, indecent or obscene language, gesture or conduct, to the annoyance of any person in such street or public place," and the question submitted to the Court (Wills and Wright, JJ.) was whether it was valid, and the Court held that the by-law was valid. It will be noticed that it is so worded as to remove the objections which were held to be fatal to a by-law passed for a similar purpose, which was in question in *Strickland v. Hayes*, (1896) 1 Q.B. 290 (noted ante vol. 32, p. 351).

ESTOPPEL—MATTER OF RECORD—MISTAKE.

Joint Committee of River Ribble v. Croston, (1897) 1 Q.B. 251, turns upon the doctrine of estoppel. The defendants had consented to an order of a County Court declaring them to have committed a statutory offence of permitting sewage to flow into a stream, and ordering them to execute sewage works for the purpose of rendering such sewage harmless. The defendants having been subsequently summoned for breach of this order, sought to show that they had consented to the order under a mistaken belief that the Act applied to