

ammunition, gunpowder, or any other goods" by Proclamation or Order-in-Council. A Proclamation was issued prohibiting the importation of pyrogallic acid. This was a proceeding for violation of the Proclamation, and it was held by Sankey, J., that the Proclamation was *ultra vires* and not warranted by the statute because pyrogallic acid was not *ejusdem generis* as the articles previously specified.

LANDLORD AND TENANT—YEARLY TENANCY—NOTICE TO QUIT—
TO BE GIVEN "AT ANY TIME"—NOTICE EXPIRING BEFORE
END OF FIRST YEAR—INVALIDITY.

Mayo v. Joyce (1920) 1 K.B. 824. In this case the validity of a notice to quit was in question in the following circumstances: The agreement of tenancy provided that "the tenancy shall commence on September 1, 1918, to continue from year to year until determined by three calendar months' notice to quit, which may be given on either side at any time." On April 29, 1919, the plaintiff gave to the defendant a notice to quit which expired on August 2, 1919. The County Court Judge who tried the action held that the notice was bad and gave judgment for the defendant, and a Divisional Court (Bailhache and Sankey, JJ.), affirmed his decision on the ground that the agreement created a yearly tenancy, which could not be terminated before the expiration of the first year. They, however, admitted that the question of the construction of the agreement was one of considerable difficulty.

SOLICITOR—ACTION BY CLIENT AGAINST SOLICITOR FOR ACCOUNT—
JURISDICTION OF COUNTY COURT.

Chambers v. Tabrum (1920) 1 K.B. 840. This was an action in a County Court by a client against his solicitor for an account. The plaintiff had retained the defendant to act for him in four matters. In only one of them were proceedings taken in a County Court, in none of the others was process issued. As the defendant delayed delivering a cash account and his bill of costs the plaintiff brought this action. The defendant contended that the County Court had no jurisdiction to entertain the action, and that the plaintiff's remedy was by summary proceedings under the Rules of Court. The County Court Judge held that the plaintiff was entitled to bring the action and that the County Court had jurisdiction and gave judgment in his favour: and his judgment was affirmed by a Divisional Court (Bailhache and Sankey, JJ.), but Bailhache, J., who delivered the judgment of the Court, said: "It is obvious that the only costs which can be taxed in the County Court are those incurred in that Court; and if the plaintiff sues