

against the corporation, sought to restrain the corporation from doing business in British Columbia until it had been licensed or registered under an Act of that province. The British Columbia Court had granted the injunction as prayed. In the other action the plaintiffs sought to recover the price of goods sold, and the defendant pleaded that the action was not maintainable because the plaintiffs (a Dominion company) was not licensed or registered under the laws of British Columbia, and in this case also the Supreme Court of British Columbia had given effect to the defence. The Judicial Committee of the Privy Council (Lord Haldane, L.C., and Lords Moulton and Sumner, and Sir Charles Fitzpatrick and Sir Joshua Williams) allowed the appeal, and reversed the judgments of the Court below, their Lordships holding that, under the B.N.A. Act, s. 91, the Dominion Parliament has power to prescribe the extent and limits of the powers of the companies which it incorporates, and that such status and powers cannot be destroyed or limited by any Provincial Legislature; and a provincial Act of B.C. providing that Dominion companies must be licensed and registered under that Act was held to be *ultra vires* of the Provincial Legislature.

BY-LAW STOPPING UP LANE—POWERS OF MUNICIPAL CORPORATION—R.S.O., c. 192, s. 472.

*United Buildings Corporation v. Vancouver* (1915) A.C. 345. This was an appeal from the Court of Appeal of British Columbia. The proceedings were instituted against the City of Vancouver to quash a by-law of that city. The corporation had a statutory power to stop up lanes and also to lease land of lanes so stopped up, but, in order to grant any bonuses the by-law required the assent of the electors. In pursuance of its powers, the corporation stopped up a certain lane, and conveyed the land to a company which owned the land on either side of the lane, for a term of 25 years, at a nominal rent, upon its conveying to the corporation a piece of land over which the lane could be and was diverted. It was objected by the applicants that this transaction was in the nature of a bonus to the company, and that the by-law authorizing the lease was invalid for want of the consent of the electors; also on the ground that it was not in the public interest, but solely in the interest of the company to which the lease had been made. It appeared that the application for diverting the lane had the consent of the majority of the owners of property in the lane, although it was strongly opposed by the present appellants. Clement, J., who heard the motion, dis-