CANADA LAW JOURNAL.

PRIZE COURT-COMMERCIAL DOMICILE-NEUTRAL PARTNER OF ENEMY FIRM-GOODS SHIPPED BEFORE WAR-PRESERVATION OF RIGHTS OF NEUTRAL PARTNER.

The Anglo-Mexican (1918) A.C. 422. This was also an appeal in a prize case from the decision of Evans, P.P.D. A firm having branches in Germany, England and Ameri & Lad a partner German born, but naturalized in the United States and resident there. The American branch of the firm had, before the war, shipped goods from the United States to the German branch, and while on their way war broke out, and the ship and cargo were seized as prize. The partner in the United States claimed a one-fifth share of the cargo, but up to the time of the hearing had taken no step to dissociate himself from the firm, and that being the case, the Judicial Committee of the Privy Council (Lords Parker, Sumner and Wrenbury, and Sir A. Channell) held that his share was confiscable and should have been condemned and the decision of Evans, P.P.D., to the contrary, was therefore reversed.

PRIZE COURT—COMMERCIAL DOMICILE—BRANCH OF NEUTRAL COMPANY IN ENEMY COUNTRY—GOODS SHIPPED FROM ENEMY COUNTRY BEFORE WAR—PURCHASE FOR BRANCH IN ALLIED COUNTRY.

The Lutzow (1918) A.C. 435. This was an appeal from a Prize Court in Egypt. The facts were that an Amer.can company having branches in Germany and Japan had prior to the war, at the instance of its Japanese branch, sent an order for the purchase of aniline dyes to its German branch. The goods had been purchas d and shipped prior to war and were seized en route after war broke out. The Judicial Committee of the Privy Council (Lords Parker, Sumner and Wrenbury, and Sirs S. Evans and A. Channell) held that in these circumstances the goods were not confiscable as prize.

PRIZE COURT-NEUTRAL VESSEL-CONTRABAND CARGO-COAL INTENDED FOR ENEMY CRUISERS-ABANDONMENT OF VOYAGE-SALE OF CARGO IN NEUTRAL COUNTRY-CAPTURE OF VESSEL ON RETURN VOYAGE-DECLARATION O LONDON, ARTS 38, 46-ORDERS-IN-COUNCIL, AUGUST 20 AND OCTOBER 29, 1914.

The Alurira (1918) A.C. 444. This was an appeal from the decision of Evans, P.P.D. (1916), P. 131 (noted *ante*, vol. 52, p. 354). The facts were that the vessel in question was Dutch and had been chartered to carry a cargo of coal ostensibly to Buenos

46.5

366