
 ENGLISH CASES.

 EDITORIAL REVIEW OF CURRENT ENGLISH
DECISIONS.

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**PRACTICE—COSTS—JURISDICTION—RELIEF CLAIMED AGAINST DEFENDANTS
ALTERNATIVELY—RULES 126, 976—(ONT. RULES 185, 1130).**

In *Sanderson v. Blyth Theatre Co.* (1903) 2 K.B. 533, the Court of Appeal (Williams, Romer, and Stirling, L.JJ.) affirmed the decision of Grantham, J., on a point of practice. Relief was claimed by the plaintiff against two defendants alternatively; he succeeded as to one and failed as to the other. Grantham, J., ordered the plaintiff to pay the successful defendants' costs, and add them to his own, which he ordered the unsuccessful defendant to pay. The appeal was simply on the point of jurisdiction as to whether the court could order a defendant to pay the costs of a co-defendant as to whom the action failed, the cause of action being on contract or for breach of warranty. The Court of Appeal held that there was jurisdiction to do this and it might be exercised in the way Grantham, J., had exercised it, or by directing the unsuccessful defendant to pay his co-defendant's costs without ordering them to be paid by the plaintiff. "The mode in which the Court of Chancery dealt with the costs of defendants to Chancery suits affords an analogy which in my opinion ought to guide the court on the present occasion," per Romer, L.J.

**TRADE UNION—CAUSE OF ACTION—INTERFERENCE WITH LEGAL RIGHT—
CONSPIRACY—MALICIOUS INTENTION—"STOP DAY."**

Glamorgan Coal Co. v. South Wales Miners (1903) 2 K.B. 545, is one of a class of actions which are becoming rather frequent in the furtherance of the efforts of employers to relieve themselves from injuries caused by the interference of trades unions with their workmen. In this case the injury complained of was that the miners employed in the plaintiff's collieries in breach of their contract abstained from working on certain days called "stop days." In so doing they acted under the direction of a trade union given by its executive council, the object being to limit the