

attachment, and he ordered it to be paid to the plaintiffs; but the Divisional Court (Darling and Jelf, JJ.) held that although the £6 13s. 8d. had lost its character of retired pay, as it had been actually received from the Paymaster-General at the time when the attaching order was served, and was therefore liable to attachment; yet the £17 12s. 6d. was not so liable, notwithstanding that the amount had been placed by the bank to the defendant's credit, as it retained the character of retired pay until it was actually paid by the Paymaster-General. The order of the Master was varied accordingly.

MASTER AND SERVANT—BREACH OF CONTRACT—WRONGFUL DISMISSAL—MEASURE OF DAMAGES.

Addis v. Gramophone Co. (1909) A.C. 438 was an action by a servant for wrongful dismissal, and the only question on the appeal was as to the proper measure of damages, and it was held by the House of Lords (Lord Loreburn, L.C., and Lords James, Gorrell and Shaw—Lord Collins dissenting), reversing the Court of Appeal, that damages in such a case cannot include any compensation for injured feelings, or for the loss the servant may sustain from the fact that the dismissal has made it difficult for him to obtain fresh employment.

TRADE UNION—INDUCING DISMISSAL BY THREAT OF STRIKE—
“TRADE DISPUTE”—“(CONTEMPLATION OR FURTHERANCE OF A
TRADE DISPUTE)”—TRADE DISPUTES ACT, 1906 (6 EDW. VII.
C. 47), s. 3, s. 5(3)—(R.S.C. c. 125, s. 32).

Conway v. Wade (1909) A.C. 506, in which the plaintiff sues as a pauper, has reached the House of Lords. The case involved a very important question. The Court of Appeal having decided that where a workman was in default to a trade union for non-payment of a fine of 10s., and a district delegate of the union went to the defaulter's employers and threatened unless he were dismissed the rest of the employees would go on strike, and he was in consequence dismissed; that this is an act done in “furtherance of a trade dispute,” and is therefore made not actionable by the Trades Disputes Act, 1906 (1908), 2 K.B. 844 (noted vol. 45, p. 72). The House of Lords (Lord Loreburn, L.C., and Lords Macnaghten, James, Atkinson, Gorrell and Shaw) have, happily for the interests of workingmen, seen their way to relieve them from the tyranny with which they were threatened, and have unanimously reversed the decision of the Court of