

to the Local Government Board, and that the procedure on such an appeal shall be such as the Board may by rules determine. A closing order having been made, an appeal was had to the Board, on which the appellant claimed the right to see the report of the inspector on which the Board was proposing to act, and he also claimed he had a right to be heard orally. The rules of the Board made no provision for any such alleged rights, and they were denied, but the appellant had an opportunity to put in any statement in writing he saw fit. The Act and rules provided that the Board should not dismiss any appeal without having first held a public local inquiry. The public inquiry having been made by an Inspector, the Board acted on his report and dismissed the appeal, which dismissal, the appellant contended, was invalid (1) because it did not shew on its face by which officers of the Board the case had been decided; (2) because of the denial of inspection of the inspector's report and refusal to hear the appellant orally. The House of Lords (Lord Haldane, L.C., and Lords Shaw, Moulton and Parmoor) reversed the decision of the Court of Appeal, which had given effect to the owner's contention. The House of Lords considered that the Act conferred administrative powers on the Local Government Board, and, in the exercise of these powers, the Board was not necessarily to be governed by the procedure in Courts of justice, and that there was nothing objectionable in the way they had carried out their duties, and that the owner had no legal right either to inspect the report or to be heard orally. Their Lordships rather flout the idea that "natural justice" can have anything to do with such proceedings; indeed, one may infer that "natural justice" has in Courts of law no existence apart from legal justice.

CANADA—LEGISLATIVE AUTHORITY OF DOMINION AND PROVINCIAL PARLIAMENTS—COMPANY INCORPORATED BY DOMINION—RESTRICTION OF CORPORATE RIGHTS OF DOMINION COMPANY BY PROVINCIAL LEGISLATION—B.N.A. ACT (30-31 VICT. c. 3), ss. 91-92.

*John Deere Plow Co. v. Wharton* (1915) A.C. 330. In this case the important question presented for decision was whether a provincial legislature can validly impose restrictions on companies incorporated by Dominion authority, so as to prevent them from doing business in the province unless they are registered or licensed under the Provincial Act. Two actions were consolidated. In the one a director of a Dominion corporation,