

ested in the fund, at least for the purpose of producing the best result in the way of income, consistent with safety, as the careful investigation by the judges, or by an officer of the court, of investments presented by suitors or beneficiaries, or by recognizing the approved companies when appointed trustees as entitled to have paid out to them the funds of the trust as contended for in the case above cited. If the contention be correct that the interests of the persons entitled to the funds are paramount, then the whole question should be faced. If on the whole it be thought that Trust Companies should be used as general investing agencies, then the court must consider whether the competition of a second, or third, or fourth Trust Company should not be invoked to produce the best result to those persons for whose interests the judges are responsible.

COMMENTS ON CURRENT ENGLISH DECISIONS.

We continue the Law Reports for April.

LONDON AGENT OF COUNTRY SOLICITOR—INTEREST ON COSTS.

The question in *Ward v. Lawson*, 43 Chy.D., 353, was simply this, viz., whether, where a country principal recovers from his client interest on his costs, his London agent is entitled also to interest on his agency fees included in such costs. The Court of Appeal (Cotton, Lindley, and Lopes, L.JJ.) decided that in the absence of any special agreement for interest, the agent was not entitled, and the decision of Chitty, J., to the contrary was therefore reversed.

JUDICIAL INQUIRY—DOMESTIC FORUM—PERSONAL INTEREST OF MEMBER OF TRIBUNAL.

An important question is discussed in *Leeson v. General Council of Medical Education*, 43 Chy.D., 366. The plaintiff, a medical practitioner, was charged by the managing body of an association of medical men, called "The Medical Defence Union," with infamous conduct, and an inquiry ordered by "The General Council of Medical Education" into the alleged charge, on which inquiry the plaintiff was found guilty, and his name ordered to be removed from the register. Two out of the twenty-nine persons who held the inquiry were also members of the Medical Defence Union, but were not members of the managing body of the Union, and had taken no part in promoting the inquiry. The plaintiff in the present action sought to restrain the General Medical Council from removing his name from the register, and from publishing the resolutions which they had passed with respect to his conduct, on the ground that the two persons in question were disqualified from taking part in the inquiry, which was therefore invalid. But the Court of Appeal (Cotton, Bowen, and Fry, L.JJ.), though divided in opinion, affirmed the decision of North, J., that the two members of the Medical Defence Union were not disqualified from taking part in the inquiry. Fry, L.J., who dissented, considered the principle laid down in *Regina v. Allen*, 4 B. & S., 915, was wide enough to preclude them from acting and to invalidate the proceedings; and it may be remarked that the judg-