

"enemies", but very shortly they may be summarised as follows:—

**Arrange-
ment of
Work**

- (1) Enemies by birth. [*Sylvestre's Case*, 1702, 7 Mod. Rep. 150.]
- (2) Enemies by participating in hostilities. [*The Netherlands South African Rly. Co. v. Fisher*, 1901, 18 T.L.R. 116; *De Jager v. Att. Gen. of Natal*, 1907, A. C. 326; *Sparenburgh v. Bannatyne*, 1 B. & P. 163.]
- (3) Enemies by naturalization.
- (4) Enemies by reason of their place of trade or business being in a hostile country. [*McConnell v. Hector*, 3 B. & P. 113; *Roberts v. Hardy*, 1875, 3 M. & S. 533; *Willison v. Patteson*, 1817, 7 Taunt, 439; *Rex v. Kupfer*, 1915, 2 K.B. 321; *The Bernon*, 1 Ch. Rob. 101.]
- (5) Enemies by commercial domicile in hostile territories. [*Wells v. Williams*, 1698, 1 Salk. 45; *Sorensen v. Reg.* 1857, 11 Moo. P.C.C. 141; *Albrecht v. Sussman*, 1873, 2 Ves. & B. 323; *O'Mealey v. Wilson*, 1808, 1 Camp. Rep. 482; *Tabbs v. Bendelack*, 1801, 4 Esp. 108; *The Mannigtry*, 32 T.L.R. 36.]
- (6) Enemies by marriage to an enemy husband. [*Harvey v. Fernie*, 1882, 8 App. Cas. 43; *Dolphin v. Robins*, 1859, 7 H. L. C. 390; *Yelverton v. Yelverton*, 1859, 29 L.J.P. 34; *Government v. Zimmerman*, 1847,

Enemy
parties to
contracts

Who are
enemies?