

workmen, is not per se unlawful. Perhaps if the men were bound by contract of which the strike was the violation, it would present a different question, but if the men might lawfully quit, the fact that they collectively availed themselves of their right cannot render the act criminal. *Com. v. Hunt*, 4 Met. (Mass.) 134; *Curran v. Treleven*, [1891] 2 Q.B. 560.

Another absolute right, which labourers in common with other individuals may enjoy, is the exercise of their power of persuasion, if the appeal be not directed to the accomplishment of some unlawful purpose. The principle which governs the cases which holds that interference with contract relations is unlawful, stands upon a peculiar ground. It is not unlawful for strikers by persuasion to cause employees to leave the service of their employer, or to dissuade other workmen from seeking employment from him. In the case of *United States v. Kane*, 23 Fed. Rep. 748, the court said, "The defendants may lawfully persuade the workmen of the plaintiff to abandon the employment in which they were engaged, as long as they use only argument or reason and avoid the use of threats, injury or violence, or any other unlawful act." See *Richter v. Tailors' Union*, 11 Ohio, Dec. 49.

Another absolute right of the labourer is to refuse to trade with a person absolutely or contingently. The admission of this right, with the other two, settles the right of a labour union, to use against an unyielding employer, the means of inflicting injury, which from its origin is called a "boycott"; this is the refusal of the members of the union to have any dealings with the employer or with a person who deals with him. So long as strikers employ no other means to deter others from dealing with the employer, except persuasion and withdrawing their own patronage, there is nothing illegal or criminal in their action. *Bohn Mfg. Company v. Hollis*, 54 Minn. 223; *State v. Glidden*, 55 Conn. 76.

The case of *Allen v. Flood*, [1898] A.C. 1, has been followed in Canada: *Perault v. Gauthier*, 28 Can. Supreme Court, 241; and has also been followed in those jurisdictions of the United