

action lies. Similarly, an English company tried in vain to recover a call due on shares from an ambassador accredited to the Crown by a foreign state,¹⁸ and so far is the doctrine carried that the household furniture in London even of a British subject, who is accredited to the Crown as Secretary to the Chinese Embassy, cannot be seized for the non-payment of parochial rates.¹⁹ This case has the curious result that a British subject, in the circumstances narrated, is exempt from the local jurisdiction of his own country. The privileges and immunities of an ambassador, in relation to the state to which he is accredited, are (1) a right to inviolability of person; (2) exemption from the local criminal jurisdiction; (3) exemption from the local civil jurisdiction, which includes not being compellable to appear before the local court, even as a witness; (4) exemption from taxation. Liability for debts incurred, however, would not be avoided or evaded by, say, an ambassador from the King of Italy to the French Republic, who visited England and incurred debts here. An action in that case would certainly lie against the ambassador personally. In *Mighell v. Sultan of Johore*²⁰ the principles of law laid down were (1) that the courts of this country had no jurisdiction over an independent foreign sovereign unless he submitted to the jurisdiction, and that such submission cannot take place until the jurisdiction has been invoked; (2) that the fact of a foreign sovereign entering into a contract in this country under an assumed name, and as a private individual, did not amount to a submission to the jurisdiction; and (3) that a certificate from the Foreign Office, or Colonial Office, as the case may be, was conclusive as to the status of a foreign sovereign. It may be mentioned that an order for a stay of proceedings was made by the Divisional Court (Wills and Lawrance, JJ.) and confirmed by the Court of Appeal (Lord Esher, M.R., Lopes and Kay, L.JJ.).

18. Compare judgment of Wills J. in *Mighell v. Sultan of Johore*, cited supra, at pp. 149, 153, and *Musurus Bey v. Gadban*, cited supra.

19. *Macartney v. Garbutt*, cited supra.

20. Cited supra.