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LEGAL NEWS.

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CURRENT TOPICS AND CASES.

The reports of cases in England, France and the United States show that considerable difficulty has been experienced by the courts of these countries in defining the precise extent to which the members of trade unions may lawfully go in carrying out the objects of their organization. The case of *Gauthier & Perrault*, decided by the Court of Appeal, at Montreal, on the 24th February, shows that a similar difficulty has been felt here, the members of the three courts being as equally divided as it was possible to be,—Mr. Justice Davidson in the Superior Court (6 C. S. 83), Mr. Justice Mathieu in the Court of Review (10 C. S. 224), and Chief Justice Lacoste and Justices Wurtele and Ouimet in the Court of Queen's Bench, being of opinion to dismiss the action of the respondent Perrault, a non-union workman, against the members of the union, while Justices Jetté and Tellier in the Court of Review, and Justices Bossé and Blanchet in the Court of Queen's Bench, were of opinion that the action should be maintained. Of the nine judges who pronounced on the case, four were in favor of sustaining the demand, and five were for dismissing it. The result is that the original judgment pronounced by Mr. Justice Davidson, dismissing the action, is restored and affirmed.

The Court of Appeal differed to some extent, but not materially, from the Court of Review in its conclusions on the facts, but the principle is laid down by the majority of the first mentioned court that a workmen's union, one of the rules of which prohibits members from working in any place where non-members are employed—without, however, imposing any penalty for breach of the rule except the loss of beneficial rights in the society—is not an illegal association, and does not constitute a conspiracy against workmen who are not members. It was further held that workmen who, without threats, violence, intimidation, or the use of other illegal means, quit work because a non-union workman is employed in the same establishment, incur no responsibility towards the latter. The majority of the court were also of opinion that the plaintiff Perrault, having left his work voluntarily, notwithstanding an intimation from his employer that he was at liberty to stay, had not suffered any damage recoverable at law. The answer to this by the dissentient members of the Court, is that it was impossible for Perrault to do otherwise, because he could not do the work alone, and that the departure of the union members involved the closing of the establishment. An effort is being made to bring this case before the Supreme Court, and in view of the importance of the question involved, and the equal division of opinion in the three Quebec Courts, it is to be hoped that the effort may be successful.

Since our Quebec Court of Appeal rendered judgment in *Gauthier & Perrault*, the New York Court of Appeals has decided the case of *Curran* v. *Galen*, in which the question was similar. The New York court has come to a different conclusion from that arrived at by the majority of our court. An article referring to the case, taken from the *New York Law Journal*, together with a report of the judgment, will be found in the present issue.

Jurors are no longer deprived of food and fire while deliberating on their verdict, but a judge in Chicago has gone further and set an evil precedent by ordering the bailiffs, in a recent case, to provide the jurors with a drink of intoxicating liquor at each meal. It is possible that this indulgence might do no harm in the case of those jurors who are accustomed to a beverage of this kind with their meals. But it is intrusting too much to the discretion of the officers of the court, and the practice might easily degenerate into a serious abuse. The W. C. T. U. of Chicago has made a formal protest against the innovation, and it will be generally conceded that the objection is a reasonable one. The time spent in deliberation is not usually so protracted that much inconvenience can be suffered from the temporary deprivation in any case, and jurors should not be encouraged in any practice which may have the effect of lessening their sense of the serious nature of the duty imposed on them.

Lord Chief Justice Russell seems to have rather astonished the legal mind in London, by voluntarily assuming duty which he had a plausible reason for ignoring. When holding the assizes at Newcastle his Lordship finished the civil work in three days, though five were allowed. Then the county of Durham provided enough work to keep both the judges occupied for the full time; but at York there were only two causes and seven criminal cases. Lord Russell disposed of the latter in one day, and at once returned to London, where he unexpectedly appeared in court on the Monday, and tried cases from the lists of the other judges of the Queen's Bench Division.

In referring to the case of *Plummer* v. *Gillespie*, *ante*, p. 66, the statement should have read that the judgment was affirmed by the Court of Review, instead of by the Court of Appeal.

SUPREME COURT OF CANADA.

OTTAWA, 20 February, 1897.

Nova Scotia.]

MACKENZIE v. MACKENZIE.

Title to land—Beneficial interest—Parties "in pari delicto."

In 1875 G. M. entered into an agreement with the owner to purchase two lots of land in Halifax and entered into possession, and commenced to build a house on one of said lots. In 1877 he was called upon to carry out his agreement and pay the purchase money, the house not being completed, but sufficiently so to enable him to occupy it. At that time G. M. had become financially embarrassed and could not make the payment. He applied to a building society for a loan, but as there were judgments recorded against him which would have priority, he caused the deed to be executed in the name of W. M., his nephew, and then procured the loan. W. M. afterwards took possession of the property, and an action was brought against him by G. M. to compel him to execute a conveyance and for an account of rents and profits. The trial judge held that the deed was taken in the nephew's name to hinder, delay and defraud creditors, and refused the relief asked for. The court *en banc* reversed this judgment and ordered W. M. to convey the property to G. M.

Held, affirming the decision of the Supreme Court of Nova Scotia, that it did not appear from the evidence that G. M. in having the deed made in the name of his nephew had the intent of defrauding his creditors, who were not prejudiced and have not complained; that the parties were not *in pari delicto*, and G. M. was entitled to relief as the more excusable of the two.

Appeal dismissed with costs.

Whitman, for the appellant.

Silver, for the respondent.

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10 March, 1897.

Ontario.]

CANADIAN COLOURED COTTON MILLS CO. v. TALBOT.

Negligence—Employer and employee—Accident—Proximate cause—Evidence for jury.

T. was employed as a weaver in a cotton mill and was injured, while assisting a less experienced hand, by the shuttle flying out of the loom at which the latter worked, and striking her on the

head. The mill contained some 400 looms, and for every forty-six, there was a man, called the "loom fixer," whose duty it was to keep them in proper repair. The evidence showed that the accident was caused by a bolt breaking by the shuttle coming against it, and as this bolt served as a guard to the shuttle, the latter could not remain in the loom. The jury found that the breaking of the bolt caused the accident, and that the "loom fixer" was guilty of negligence in not having examined it within a reasonable time before it broke. T. obtained a verdict, which was affirmed by the Court of Appeal.

Held, Gwynne, J., dissenting, that the loom fixer had not performed his duty properly; that the evidence as to negligence could not have been withdrawn from the jury; and that though the mill was well equipped, as the jury had found the accident due to negligence, there being evidence to justify such finding, the verdict should stand.

Held, per Gwynne, J., that the finding of the jury that the negligence consisted in the omission to examine the bolt was not satisfactory, as there was nothing to show that such examination could have prevented the accident, and there should be a new trial. Appeal dismissed with costs.

Martin, *Q.C.*, for the appellants.

Tate, for the respondent.

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26 February, 1897.

Quebec.]

DEMERS v. BANK OF MONTREAL.

Appeal—Commercial case—Trial by jury—Refusal of—Interlocutory matter.

By arts. 448, 449 and 450 C.C.P., trial by jury may be had in actions on debts, promises and agreements of a mercantile nature at the option of either party. In this case the trial judge held that the action was not mercantile and refused a jury, and his decision was affirmed by the Court of Queen's Bench. On motion to quash an appeal to the Supreme Court,

Held, that the judgment of the Queen's Bench was interlocutory only, and the appeal did not lie.

Appeal quashed with costs.

Fitzpatrick, *Q.C.*, *Sol.-Gen. of Canada*, and *Ferguson*, *Q.C.*, for the motion.

Lane, contra.

CHANCERY DIVISION.

LONDON, 25 February, 1897.

In re THE MAGNOLIA COMPANY'S TRADE-MARKS. *Ex parte* THE ATLAS METAL COMPANY (32 L.J.).

Trade-mark—Name both botanical and geographical—Descriptive of character of goods.

This was a motion to expunge the word "Magnolia" from the Register of Trade-marks on the grounds (1) that the word was a geographical name, and (2) that it had reference to the character or quality of the goods.

The word was registered in June, 1894, for certain goods in class 5—namely, unwrought and partly wrought metals used in manufacture. It was not claimed as having been in use before August 13, 1875.

It appeared that Magnolia is the name of upwards of twenty towns and places in the United States of America, where the tree or shrub of that name grows in great profusion. It also appeared that the term was applied to a particular alloy made by the owners of the trade-mark, and was descriptive of that kind of alloy, which was known as "Magnolia Metal" before the date of the registration.

KEKEWICH, J., held that the name was botanical rather than geographical, and that therefore the trade-mark was not bad on the first ground, but that it was bad on the second ground, as the word, under the circumstances, had reference to the character of the goods, and made an order to rectify the register accordingly.

CHANCERY DIVISION.

LONDON, 5 March, 1897.

Before ROMER, J.

BROOKS v. THE RELIGIOUS TRACT SOCIETY (32 L.J.)

Copyright—Picture—Infringement.

The plaintiff owned the copyright in a picture and engraving entitled "Can You Talk?" of which a little child and a collie dog formed the central group and motive, the title being presumably suggested in part by the juxtaposition of and in part by the contrast between the pair of sentient beings of whom one only was

gifted with speech. The defendants owned a periodical in which appeared, as an illustration to the letterpress, a woodcut, depicting a collie dog in attitude and expression similar to the one in "Can You Talk?"—namely, seated, and looking downward with, as the Court said, a sagacious expression in his face; only whereas in the picture he was contemplating the child, in the woodcut the place of the child was occupied by a tortoise, around which were grouped other domestic animals with looks either of astonishment or of alarm. The woodcut was entitled "A Strange Visitor." The plaintiff claimed to restrain the sale of the woodcut as an infringement of his copyright.

The defendants' counsel argued that the substitution of the tortoise for the child made the incident depicted in the woodcut meaningless as a presentment of the idea of the picture, which required for its point the contrast between the human and the dumb animal. It would therefore interfere neither with the reputation of the artist of "Can You Talk?" nor with the commercial value of his work, which it was the object of copyright law to protect—see *Hanfstaengl* v. *The Empire Palace*, 63 Law J. Rep. Chanc. 681; L. R. (1894) 3 Chanc. 109, *per* Lopes, L.J.

ROMER, J., held that infringement had taken place. The dog —a principal figure in the picture—had been copied, and besides that the artistic feeling and character of the work had been taken. In substance the plaintiff's design had been followed, with the substitution of other animals for the child. Where a substantial part of a picture was taken, *qua* picture, then there was infringement; as, for instance, if from an historical picture the principal figure were reproduced, although alone. An injunction was accordingly granted.

NEW YORK COURT OF APPEALS.

2 March, 1897.

CURRAN, respondent, v. GALEN *et al.*, appellants.

Public policy—Procuring discharge of plaintiff from employment—Arrangement between organization of workingmen and association of employers to coerce workingmen to become members of organization.

Public policy and the interest of society favor the utmost freedom in the citizen to pursue his lawful trade or calling, and if the purpose of an organization or combination of workingmen be to hamper or to restrict that freedom,

and through contracts or arrangements with employers to coerce other workingmen to become members of the organization and to come under its rules and conditions, under the penalty of the loss of their positions and of deprivation of employment, their purpose is unlawful.

Plaintiff, who had been discharged from employment by a brewing company, brought an action against the defendants for conspiring and confederating together to procure his discharge and prevent him from obtaining employment. The defendants in their answer alleged as a defence that they were members of a Workingman's Assembly, Knights of Labor, which had an agreement with the Brewers' Association, composed of the brewing companies, that all their employees should be members of the assembly, and that no employee should work for a longer period than four weeks without becoming such member; that what the defendants did in obtaining the plaintiff's discharge was as members of the assembly, and in pursuance of this agreement, upon his refusing to become a member. Plaintiff demurred to this defence. Held, *that the defence was insufficient in law, and that the demurrer should be sustained.*

The plaintiff demands damages against the defendants for having confederated and conspired together to injure him by taking away his means of earning a livelihood and preventing him from obtaining employment. He sets out in his complaint that he was an engineer by trade, and that, previously to the acts mentioned, he was earning, by reason of his trade, a large income, and had constant employment at remunerative wages. He sets forth the existence of an unincorporated association in the city of Rochester, where he was a resident, called the Brewery Workingmen's Local Assembly, 1795, Knights of Labor, which was composed of workingmen employed in the brewing business in that city, and was a branch of a national organization known as the Knights of Labor. He alleges that it assumed to control by its rules and regulations the acts of its members in relation to that trade and employment, and demands and obtains from its members implicit obedience in relation thereto.

Plaintiff then alleges in his complaint that the defendants Grossberger and Watts wrongfully and maliciously conspired and combined together, and with the said local assembly, for the purpose of injuring him and taking away his means of earning a livelihood, in the following manner, to wit:

That in the month of November, 1890, Grossberger and Watts threatened the plaintiff that unless he would join said local assembly, pay the initiation fee and subject himself to its rules and regulations, they and that association would obtain plaintiff's

discharge from the employment in which he then was and make it impossible for him to obtain any employment in the city of Rochester, or elsewhere, unless he became a member of said association. In pursuance of that conspiracy, upon plaintiff refusing to become a member of said association, Grossberger and Watts and the association made complaint to the plaintiff's employers and forced them to discharge him from their employ, and by false and malicious reports in regard to him sought to bring him into ill-repute with members of his trade and employers and to prevent him from prosecuting his trade and earning a livelihood. The answer, in the first place, admitted all that was alleged in respect to the organization of the local assembly, as to how it was composed and as to its being a branch of the national organization of the Knights of Labor, and as to its assuming to control the acts of its members and to demand from them implicit obedience. It then denies, generally and specifically, each and every other allegation in the complaint.

As a second and separate answer and defence to the complaint, the defendants set up the existence in the City of Rochester of the Ale Brewers' Association, and an agreement between that association and the local assembly described in the complaint, to the effect that all employees of the brewery companies belonging to the Ale Brewers' Association "shall be members of Brewery Workingmen's Local Assembly, 1796, Knights of Labor, and that no employee should work for a longer period than four weeks without becoming a member." They alleged that the plaintiff was retained in the employment of the Miller Brewing Company "for more than four weeks after he was notified of the provisions of said agreement, requiring him to become a member of the local assembly," that defendants requested plaintiff to become a member, and upon his refusal to comply, "Grossberger and Watts, as members of said assembly, and as a committee duly appointed for that purpose, notified the officers of the Miller Brewing Company that plaintiff, after repeated requests, had refused more than four weeks to become a member of said assembly," and that "defendants did so solely in pursuance of said agreement, and in accordance with the terms thereof, and without intent or purpose to injure plaintiff in any way." The plaintiff demurred to the matter set up as a separate defence to

the complaint, upon the ground that it was insufficient in law upon the face thereof. The Special Term and General Term have sustained the demurrer, and the question is whether this matter, set up by way of special defence, is sufficient to exonerate the defendants from the charge made in the complaint of a conspiracy to injure the plaintiff and to deprive him of the means of earning his livelihood.

PER CURIAM.—In the decision of the question before us we have to consider whether the agreement upon which the defendants rely in defence of this action, and to justify their part in the dismissal of the plaintiff from his employment, was one which the law will regard with favor and uphold, when compliance with its requirements is made a test of the individual's right to be employed. If such an agreement is lawful, then it must be conceded that the defendants are entitled to set it up as a defence to the action, forasmuch as they alleged that what they did was in accordance with its terms.

In the general consideration of the subject, it must be premised that the organization, or the co-operation of workingmen, is not against any public policy. Indeed, it must be regarded as having the sanction of law when it is for such legitimate purposes as that of obtaining an advance in the rate of wages or compensation, or of maintaining such rate (Penal Code, Sec. 170).

It is proper and praiseworthy, and, perhaps, falls within that general view of human society which perceives an underlying law that men should unite to achieve that which each by himself cannot achieve, or can achieve less readily. But the social principle which justifies such organizations is departed from when they are so extended in their operations as either to intend or to accomplish injury to others. Public policy and the interests of society favor the utmost freedom in the citizen to pursue his lawful trade or calling, and if the purpose of an organization or combination of workingmen be to hamper, or to restrict, that freedom, and, through contracts or arrangements with employers, to coerce other workingmen to become members of the organization, and to come under its rules and conditions, under the penalty of the loss of their positions, and of deprivation of employment, then that purpose seems clearly unlawful, and militates against the spirit of our government and the nature of our institutions. The effectuation of such a purpose would conflict with

that principle of public policy which prohibits monopolies and exclusive privileges. It would tend to deprive the public of the services of men in useful employments and capacities. It would, to use the language of Mr. Justice Barrett in *People ex rel. Gill* v. *Smith*, 5 N. Y. Cr. Rep. at p. 513, "impoverish and crush a citizen for no reason connected in the slightest degree with the advancement of wages or the maintenance of the rate."

Every citizen is deeply interested in the strict maintenance of the constitutional right freely to pursue a lawful avocation, under conditions equal as to all, and to enjoy the fruits of his labor, without the imposition of any conditions not required for the general welfare of the community. The candid mind should shrink from the results of the operation of the principle contended for here: for there would certainly be a compulsion, or a fettering, of the individual, glaringly at variance with that freedom in the pursuit of happiness which is believed to be guaranteed to all by the provisions of the fundamental law of the State. The sympathies, or the fellow-feeling which, as a social principle, underlies the association of workingmen for their common benefit, are not consistent with a purpose to oppress the individual who prefers by single effort to gain his livelihood. If organization of workingmen is in line with good government, it is because it is intended as a legitimate instrumentality to promote the common good of its members. If it militates against the general public interest, if its powers are directed toward the repression of individual freedom, upon what principle shall it be justified? In *Regina* v. *Rowlands* (17 Ad. & Ellis [N.S.], *689) the question involved was of the right by combination to prevent certain workingmen from working for their employers, and thereby to compel the latter to make an alteration in the mode of conducting their business.

The Court of Queen's Bench, upon a motion for a new trial for misdirection of the jury by Mr. Justice Erle below, approved his charge, and we quote from his remarks. He instructed the jury that "a combination for the purpose of injuring another is a combination of a different nature, directed personally against the party to be injured, and the law allowing them to combine for the purpose of obtaining a lawful benefit to themselves gives no sanction to combinations which have for their immediate purpose the hurt of another. The rights of workmen are conceded;

but the exercise of free will and freedom of action, within the limits of the law, is also secured equally to the masters. The intention of the law is, at present, to allow either of them to follow the dictates of their own will, with respect to their own actions, and their own property, and either, I believe, has a right to study to promote his own advantage, or to combine with others to promote their mutual advantage."

The organization of the local assembly in question by the workingmen in the breweries of the city of Rochester may have been perfectly lawful in its general purposes and methods, and may otherwise wield its power and influence usefully and justly, for all that appears.

It is not for us to say, nor do we intend to intimate, to the contrary; but so far as a purpose appears from the defence set up to the complaint that no employee of a brewery company shall be allowed to work for a longer period than four weeks, without becoming a member of the Workingmen's Local Assembly, and that a contract between the local assembly and the Ale Brewers' Association shall be availed of to compel the discharge of the independent employee, it is, in effect, a threat to keep persons from working at the particular trade, and to procure their dismissal from employment. While it may be true, as argued, that the contract was entered into on the part of the Ale Brewers' Association with the object of avoiding disputes and conflicts with the workingmen's organization, that feature and such an intention cannot aid the defence, nor legalize a plan of compelling workingmen, not in affiliation with the organization, to join it, at the peril of being deprived of their employment and of the means of making a livelihood.

In our judgment, the defence pleaded was insufficient, in law, upon the face thereof, and, therefore, the demurrer thereto was properly sustained.

The judgment appealed from should be affirmed, with costs.

All concur, except Haight, J., not sitting.

COERCION THROUGH PROCURING DISCHARGE FROM EMPLOYMENT.

We believe that the quite decided weight of opinion, in the profession and outside of it, has approved of the decision of the Supreme Court of Massachusetts in *Vegelahn* v. *Guntner*, 44

N.E.R. 1077. It was therein held that the maintenance of a patrol of two men in front of plaintiff's premises, in furtherance of a conspiracy to prevent, whether by threats and intimidation or by persuasion and social pressure, any workman from entering into, or continuing in his employment, would be enjoined.

There has, however, been some adverse comment upon that decision in periodicals of excellent standing. The theory of hostile criticism, as stated in the dissenting opinion of Judge Holmes and amplified by editorial comment, is that a controversy of the kind involved was outside of the legitimate purview of the law courts; that such controversy represented one phase of a great industrial evolution, or revolution, now in progress; and that it was the duty of the courts to keep hands off when novel questions arose, in order that economic and social forces might adjust themselves. While the courts, of course, should not officiously interpose in matters of individual or confederate concern, in our judgment it would be shirking an essential function of tribunals of justice to decline jurisdiction in labor controversies simply because novel phases of fact arise.

It is in the highest degree important that the courts protect fundamental rights and impartially enforce them as to all parties and classes. The courts have, therefore, quite unanimously condemned boycotts of many and various kinds, because they tend to do away with freedom of competition and personal liberty and security in general. Attempts by one person or an organization of persons to coerce another person, by affecting his standing or relations with a third person, are held unlawful. If the boycott principle were countenanced by the courts and permitted to grow into a regular rule of procedure, there could be no safety for individual liberty of conduct and contract against the despotism of industrial associations and cliques.

The decision of the New York Court of Appeals in *Curran* v. *Galen* (N.Y.L.J., March 9, 1897), is very consistently in line with the Massachusetts case above referred to, and the general judicial attitude toward industrial controversies. It appeared that plaintiff, who had been discharged from employment by a brewing company, brought an action for damages against the defendants for conspiring and confederating together to procure his discharge and prevent him from obtaining employment. The defendants in their answer alleged as a defence that they were

members of a Workingman's Assembly, Knights of Labor, which had an agreement with a Brewing Association, composed of the brewing companies, that all their employees should be members of the assembly, and that no employee should work for a longer period than four weeks without becoming a member; that what the defendants did in obtaining the plaintiff's discharge was as members of the assembly and in pursuance of this agreement, upon his refusing to become a member.

Plaintiff demurred to this defence, and it was held that the same was insufficient in law, and that the demurrer should be sustained. The Massachusetts case above referred to concerned a controversy between an employer and employees. The New York case affects the right of an employee himself as against a Workingman's Assembly; but the same fundamental principle underlies both decisions. The following language from the opinion of the New York Court of Appeals felicitously presents the claim of individual liberty, which, as above intimated, everything in the nature of a boycott tends to subvert:

"Every citizen is deeply interested in the strict maintenance of the constitutional right freely to pursue a lawful avocation, under conditions equal as to all, and to enjoy the fruits of his labor, without the imposition of any conditions not required for the general welfare of the community.

"The candid mind should shrink from the results of the operation of the principle contended for here; for there would certainly be a compulsion, or a fettering, of the individual, glaringly at variance with that freedom in the pursuit of happiness which is believed to be guaranteed to all by the provisions of the fundamental law of the State. The sympathies, or the fellow feeling which, as a social principle, underlies the association of workingmen for their common benefit, are not consistent with a purpose to oppress the individual who prefers by single effort to gain his livelihood. If organization of workingmen is in line with good government, it is because it is intended as a legitimate instrumentality to promote the common good of its members. If it militates against the general public interest, if its powers are directed toward the repression of individual freedom, upon what principle shall it be justified?"—*N. Y. Law Journal.*

PACIFIC BLOCKADE.

The legality of instituting a blockade in time of peace as a measure of restraint short of war has been frequently questioned, but the precedents tend to show that it is legal, subject to the important qualification that it should only be applied against the vessels of the offending nation, and not against those of third nations (Lord Granville to M. Waddington on the Formosa blockade, 1884; and the Greek blockade, 1886). Hall (3rd edit., p. 372) says of the measure: "Pacific blockade, like every other practice, may be abused. But, subject to the limitation that it shall be felt only by the blockaded country, it is a convenient practice; it is a mild one in its effects even upon that country, and it may sometimes be of use as a measure of international police, when hostile action would be inappropriate and no action less stringent would be effective." It has proved specially advantageous against weak States. The moral sentiment of civilized nations may be relied upon to prevent its abuse by any one nation; while a still more effective check exists in the fact that the measure is usually put in force by the joint action of several nations rather than by one nation alone.

Greece holds a prominent position in relation to pacific blockade as a means for the settlement of international difficulties, and it appears probable that unless she complies with the demands of the Powers with reference to Crete she may afford another illustration of its application. The first occasion upon which blockade was applied otherwise than between nations at war with one another was in 1827, when the coasts of Greece, which were occupied by Turkish forces, were blockaded by the squadrons of Great Britain, France, and Russia, with the view of coercing Turkey, with whom the blockading nations professed to be at the time still at peace. Again, in 1850, when Greece refused to compensate a British subject for injury to property done by Greek subjects, the Greek ports were blockaded by England, with the somewhat insignificant eventual result that a claim of more than 21,000*l.* was settled by a payment of 150*l.* Thirdly, in order to compel her to abstain from making war upon Turkey, Greece was in 1886 blockaded by the fleets of Great Britain, Austria, Germany, Italy, and Russia, with the result that within little more than a fortnight from the notification and enforcement of the blockade the King of Greece signed a decree to disarm.—*Law Journal (London).*

INSTRUCTION TO LAND BUYERS.—Lines over 300 years old, copied from the roll in the Manor Court office, Wakefield, England.

First see the land which thou intend'st to buy
Within the seller's title clearly lye,
And that no woman to it doth lay claime
By dowry, joynture, or some other name
That may incumber. Know if bond or fee
The tenure stand, and that from each feoffee
It be released, that th' seller be soe old
That he may lawful sell, thou lawful hold.
Have special care that it not mortgag'd lye,
Nor be entailed upon posterity.
Then if it stand in statute bound or noe,
Be well advised what quitt rent out must goe,
What custome service hath been done of old
By those who formerly the same did hold.
And if a wedded woman put to sale
Deal not with her unless she bring her male,
For she doth under covert barren goe,
Although sometimes some traffique soe (we know).
Thy bargain made and all this done,
Have special care to make thy charter run
To thee, thy heirs, executors, assigns,
For that beyond thy life securely binds.
These things foreknown and done, you may prevent
Those things rash buyers many times repent;
And yet when you have done all you can,
If youle be sure, deal with an honest man.

SENDING MARKED COPIES TO A JUDGE.—In a recent political case heard before a Harrisburg (Pa.) court, the judges took occasion to most severely arraign certain newspapers for criticising the action of the court in preliminary proceedings. The court claimed that the papers in question attempted to influence its action in the case by mailing to the judges marked copies of their newspapers, and that such an act was equivalent to that of a person seeking to influence the decision of a judge by solicitation or threats. The court says that the only difference is that the papers have not the courage a man would show in coming in person to a judge, for in that case a judge could spurn him from his presence, but, in that of the papers, "we can only express our indignation and contempt both for the matter and the manner of their violation of the principles which should govern decent and honest journalism."