NOTES AND COMMENTS

The Swing of Natural Justice?


These hopes are again felt to be dupes by some because of more recent decisions like *Royal Government of Greece v. Brixton Prison Governor* (1969) 3 All E.R. 1337; 3 W.L.R. 1107 (H.L.) (on appeal from *Regina v. Brixton Prison Governor Ex parte Kotronis* (1969) 3 W. L. R. 528 and *Atkinson v. United States of America Government* (1969)3 W.L.R. 1074 (see Graham Zellick, “Extradition and Natural Justice” Vol. 120 The New Law Journal p. 857 where the author criticizes the above decisions as contrary to *Ridge v. Baldwin* and *Anisminic Ltd. v. Compensation Commission.*). These recent decisions were on the basis of interpretation of Section 10 of the Extradition Act, 1870. It is suggested that an interpretation of S. 10 of the Extradition Act and judicial control of aliens under the Act were not to be considered to be in *pari materia* with the jurisprudence of judicial control of British subjects. From the very nature of the things the two cannot be identical under our present development of national and international law. It is further suggested that there is no change in the trend of general principles of administrative law evidenced by decisions like *Ridge v. Baldwin* in England and by the decisions under the Extradition Act mentioned above.