inherit it, and yet we presume a conveyance of land to a man and "his executors and administrators" would now, as formerly, convey but a life estate for want of proper words of limitation, notwithstanding the provisions of section 4 of the Conveyancing and Law of Property Act, 1886.

An English real property lawyer, without the heir-at-law to conjure with, is very like an actor attempting to produce the play of Hamlet without the melancholy Dane. Possibly it may be held that the legal personal representatives of a deceased person are by the Act now constituted his legal "heirs-at-law," for the purpose of inheriting his estates of inheritance.

No doubt the Act will be found to have produced other apparent incongruities, and it may be somewhat difficult to make it fit in with all the old learning on the law of real estate. But notwithstanding any technical difficulties that may arise, we think the Act will prove to be a move in the right direction, and though it is perhaps not framed in the best mode that could have been devised for simplifying this branch of the law, it will nevertheless remove what has for a long time been felt to be an anomaly, viz., the inability of the personal representative to administer what is often the principal part of a deceased person's assets.

For the protection of those beneficially entitled certain safeguards are provided. An administrator will be required to give security for the value of the land as well as the personal property; and where infants are interested in land, which, but for the Act, would not devolve on the personal representative, the latter cannot sell without the concurrence of the official guardian *ad litem*, or an order of the High Court of Justice. The High Court has power to appoint a local judge or a local Master to concur instead of the official guardian.

SELECTIONS.

IT is impossible to agree with the summing-up of Mr. Justice Cave in *Regina* v. *Hyndman* as reported in the daily papers. The questions for the jury in a prosecution for seditious words, as in a case of defamatory words or writings, are—first, were the words charged spoken? and, secondly, had they the tendency alleged? The learned judge's summing-up was, however, concerned almost entirely with the question of malice, an inference which the law presumes against the utterer of words with a seditious tendency. The only reference to the presumption of law upon which the whole case turned seems to have been in the words: "The Attorney-General had said that inciting to disorder was the natural consequence of the words the defendants used, and, therefore, they were responsible for it. He could not agree entirely as to that. There must be, in order to make out the offence of speaking seditious words, a criminal intent. The words must be seditious and spoken with a seditious intent. Although it was a good working rule to say that a man must be taken to intend the natural consequences of his acts, it was very proper to ask the jury if there was anything to show to the contrary." In some reports Mr. Justice Cave is made to say of this fundamental rule of law that it is a legal fiction, but it is difficult to believe that this was meant to be conveyed. The learned judge appears to have relied too much on clause 102 of the Criminal Code (Indictable Offences) Bill, which in an endeavour to be brief is altogether obscure. Mr. Justice Stephen, however, in his "Digest of the Criminal Law," modifies that statement by adding "in determining whether the intention with which any words were spoken was or was not seditious, every person shall be deemed to intend the consequences which would naturally follow from his conduct at the time and under the circumstances in which he so conducted himself." This is a clumsy periphrasis, but that Mr. Justice Stephen meant to draw no distinction between sedition and defamation in this