REVIEW OF CURRENT ENGLISH CASES.

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CHURCH OF ENGLAND CURATE — EMPLOYMENT — CONTRACT OF SERVICE—MASTER AND SERVANT.

In re National Insurance Act (1912) 2 Ch. 563. This was a case arising under the National Insurance Act and may be noticed briefly for the fact that it is a judicial decision of Parker, J., that the status of an English incumbent and his curates, and of the bishop and a curate, is not that of employer and employed, whether the curate be formally licensed under the bishop's seal or is acting under the bishop's temporary permission—but the curate is a person holding an ecclesiastical office, and he is not in the position of a person whose duties and rights are defined by contract.

COMPANY — PREFERENCE SHARES — DISTRIBUTION OF PROFITS — ORDINARY SHARES—RIGHTS OF PREFERENCE AND ORDINARY SHAREHOLDERS INTER SE.

Will v. *United Lankat Plantations Co.* (1912) 2 Ch. 571. This was a contest between preferential and ordinary shareholders of a limited company—the former claiming that, after the ordinary shareholders had been paid a dividend equal to that paid on the preferential shares, then any surplus profits were divisible between both classes of shareholders. Joyce, J., gave effect to this contention, but the Court of Appeal (Cozens-Hardy, M.R., and Farwell and Kennedy, L.JJ.) reversed his decision, holding that where preference shares are given a fixed preferential dividend at a specified rate the right of the holders of such shares to any further dividend is impliedly negatived.

COMPANY—MEMORANDUM OF ASSOCIATION—BUSINESS OF LIFE INSURANCE PROHIBITED—INVESTMENT POLICY—PROVISION FOR RETURN OF PREMIUMS IN EVENT OF DEATH BEFORE FIXED PERIOD—ULTRA VIRES.

Joseph v. *Law Integrity Insurance Co.* (1912) 2 Ch. 581. In this case the question was whether certain policies issued by the defendants were ultra vires of the company which was incorporated to carry on every kind of insurance and guarantee business except the business of life insurance. The company