enforce American judgments without, at least, an investigation into merits; founding its opinion upon a jealous construction of comity or reciprocal international courtesy. This decision follows the present rule of most continental countries, which was formerly the rule in England.

Ritchie v. *Mullen*, 159 U.S. 235, and *Erie* v. *McHenry*, 17 Fed. Rep. 414, will serve to indicate that the judgments of English and Colonial Courts would not, however, be affected by the principle laid down in *Hilton* v. *Guyott*. As a fact they are treated, in all American Courts, substantially as domestic judgments.

WM. SETON GORDON.

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ENGLISH CASES.

EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

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TRUSTEE—BREACH OF TRUST—RIGHT TO INVEST—IMPROPER INVESTMENT—INTEREST.

In *re Barclay*, *Barclay* v. *Andrew* (1899) 1 Ch. 674, may be briefly referred to for the fact, that in an administration suit, in which a trustee was found guilty of a breach of trust in neglecting to make investment of the trust funds, they were charged with interest at 3 per cent. with annual rests on the balances in their hands, and in ascertaining such balances trust funds improperly invested were to be treated as remaining in their hands.

WILL—CONSTRUCTION—"MONEY"—MEANING OF "ANY MONEY THAT MAY BE IN MY POSSESSION"—REVERSIONARY INTEREST IN PERSONALTY.

In *re Egan*, *Mills* v. *Penton* (1899) 1 Ch. 688, the novel question whether a reversionary interest in personalty could pass under a bequest of 'money' was the nut which Stirling, J., had to crack. The testatrix died in 1892 and by her will, after certain bequests of stock, made the following bequest: "Any money not mentioned in the aforesaid bequests that may be in my possession at my death after payment of my debts, funeral and testamentary expenses, I give absolutely" to one Penton. She