

estopped the plaintiffs from asserting their title, and also that Florence Coleman's assignment, being prior in date to the bank's charge, gave her the better equity and entitled her to priority.

WILL—CONSTRUCTION—"ISSUE"—"PARENT."

In re Timson, Smiles v. Timson (1916) 2 Ch. 362. The Court of Appeal (Lord Cozens-Hardy, M.R., and Pickford and Neville, L.J.J.) have affirmed the decision of Younger, J. (1916), 1 Ch. 293 (noted ante vol. 52, p. 225).

WILL—CONSTRUCTION—PROVISION AGAINST LAPSE OF LEGACY BY DEATH OF LEGATEE—BEQUEST BY CODICIL.

In re Smith, Prada v. Vardroy (1916), 2 Ch. 368. The Court of Appeal (Lord Cozens-Hardy, M.R., Pickford, and Warrington, L.J.J.) have affirmed the judgment of Sargant, J. (1916) 1 Ch. 523 (noted ante vol. 52, p. 312).

WILL—SPECIFIC LEGACIES—SHARES—FREEHOLD MORTGAGES—COSTS OF TRANSFER TO SPECIFIC LEGATEES.

In re Grosvenor, Grosvenor v. Grosvenor (1916) 2 Ch. 375. The point decided in this case is simply this: that where an executor assents to specific legacies of shares in a limited company, or of freehold mortgages, the cost of transfers to the specific legatees must be borne by them, and not by the residuary estate.

WILL—RULE AGAINST PERPETUITIES—GIFT OF REALTY TO BACHELOR FOR LIFE—REMAINDER TO ANY WOMAN HE MAY MARRY FOR LIFE—REMAINDER TO CHILDREN OF FIRST LIFE TENANT IN EQUAL SHARES.

In re Garnham, Taylor v. Baker (1916) 2 Ch. 413. The will in question in this case devised realty in trust for the testator's son for life, and after his death for any woman whom he should marry, for her life, with remainder in equal shares to the children of his son; and the question was whether or not this disposition infringed the rule against perpetuities. Neville, J., held that as the children entitled in remainder could be ascertained, and their estate would vest, on the death of the first tenant for life, the disposition did not infringe the rule, and was valid. But he held that a trust for sale after the wife's death was void for perpetuity, and did not operate as a conversion. The rule is usually stated as follows: "Where the vesting of an interest in