that consideration, the deed shall be sufficient authority for the person liable to pay or give the same for his paying or giving the same to the solicitor, without the solicitor producing any separate or other direction or authority in that behalf, from the person who executed or signed the deed or receipt."

If our legislative fathers should see fit to adopt this suggestion, it would be well for their draftsman to avoid some of those snares which beset the interpretation of the most skilfully drawn statutory enactment, and go far to justify the boast made, if we mistake not, by the famous O'Connell, that "he could drive a coach and four through any Act of Parliament ever devised." There are certain pitfalls for the unwary lurking in this apparently plain and definite section, the discovery of which has no doubt been productive of much discomfort to some of the parties concerned.

The most important of these is disclosed in the case of *In re Bellamy and Metropolitan Board of Works*, 24 Ch. Div. 387, in which it was held that this section did not protect a purchaser who paid purchase-money to the solicitor of trustees. It required two more Acts of Parliament to set this little matter right; now, however, it is provided by the Trustee Act, 1893 (52 & 53 Vict. c. 53 (Imp.)), that trustees may appoint a solicitor to receive "any money or valuable consideration or property receivable by the trustee under the trust, by permitting the solicitor to have the custody of and to produce a deed containing any such receipt as is referred to in" the section above quoted. This, too, seems a reasonable provision in itself, and might properly be adopted as a sort of corollary to the original section.

Another interesting point which has been raised in the English Courts is as to the meaning of the expression "a solicitor" in the first line of section 56. It has been held in the case of *Day* v. *Woolwich*, 40 Ch. Div. 491, that the solicitor must be acting for the person to whom the money is expressed to be paid. Some doubt, however, seems to be thrown on this dictum by the case of *King* v. *Smith* (1900) 2 Ch. 425, in which that acute judge, Farwell, J., makes some observations which seem exceedingly pertinent. He says that "there is a good deal to be said in favour of