

parts of the will that the testator has drawn a distinction between "issue" and "children," the word "issue" may have a wider meaning than "children" and include grandchildren and other similar issue, and he so construed the word "issue" in the will under consideration.

LANDLORD AND TENANT—PAYMENT OF RENT—DEDUCTION BY
TENANT OF PROPERTY TAX PAID BY HIM—PROOF OF PAYMENT
BY TENANT.

North London and General Property Co. v. Moy (1918) 2 K.B. 439. In this case the Court of Appeal (Pickford, Warrington, and Scrutton, L.JJ.) have reversed the judgment of Low, J. (1917) 2 K.B. 617 (noted *ante* vol 54, p. 62). The question was whether a tenant who claimed to have paid the property tax was bound to produce proof of payment to his landlord. Low, J., thought that he was, but the Court of Appeal came to the conclusion that the Act authorizing the tenant to pay the tax and deduct it from his rent did not impose on him liability to produce evidence of the payment to his landlord. Their Lordships thought that the defendant had acted very unreasonably, and though they dismissed the action, did so without costs, but allowed the defendant the costs of the appeal.

SHIP REQUISITIONED BY ADMIRALTY—SALVAGE SERVICES PER-
FORMED BY VESSEL REQUISITIONED—RIGHT TO SALVAGE—
"SHIP BELONGING TO HIS MAJESTY"—MERCHANT SHIPPING
ACT, 1894 (57-58 VICT. C. 60) s. 557—MERCHANT SHIPPING
(SALVAGE) ACT, 1916 (6-7 GEO. V. C. 41) s. 1.

Admiralty Commissioners v. Page (1918) 2 K.B. 447. By the Merchant Shipping Act, 1894, s. 557 it is provided that when salvage services are rendered by a ship belonging to His Majesty no charge is to be made therefor, but by the Merchant Shipping (Salvage) Act, 1916, s. 1, it is provided that if salvage services are rendered by any ship belonging to His Majesty specially equipped with salvage plant then, notwithstanding s. 557 above referred to, the Admiralty shall be entitled to claim for salvage services rendered by such vessel. In the present case a tug was requisitioned by the Admiralty upon terms which amounted to a demise of the vessel and while so in the service of the Admiralty was especially equipped with salvage plant and rendered salvage services; and the question presented for Bailhache, J.'s, decision was whether the owners, or the Admiralty were entitled to the amount of the salvage award. This depended on whether or not the vessel was to be regarded as "belonging to His Majesty," within the