or under any legal process, the wife of the mortgagor or grantor [*i.e.*, the grantor in an instrument intended to operate as a mortgage],'' who shall have so barred her dower in such lands, shall be entitled to dower in any surplus of the purchase money arising from such sale which may remain after satisfaction of the claim of the mortgagee or grantee to the same extent as she would have been entitled to dower in the land from which such surplus purchase money shall be derived, had the same not been sold. Certainly a creditor of the husband could not claim this surplus money without satisfying the wife's claim, and if not, it is difficult to see on what principle such a creditor can sell the equity of redemption, and take the proceeds freed from her claim.

We are not, however, prepared to assent to this view that a husband can, since the Act, by an assignment of an equity of redemption, cut out his wife's interest. It is a canon of construction that effect should, if possible, be given to every section of a statute. It appears to us the decision cited reads the statute as if the first section were omitted. Unless this section prevents a husband disposing of an equity of redemption to the prejudice of his wife, what effect has it? With the above decision, and that of Galt, J., in *Calvert* v. *Black*, 8 P. R. 255, against us, we feel bound to say that it is not improbable that our view is incorrect, but the question is so important that we feel it our duty to call attention to it, as practitioners acting upon these decisions may find that the construction which appears to us to be that which is in accordance with the intention of the legislature will ultimately prevail.

RECENT ENGLISH DECISIONS.

The *Law Reports* for November comprise 15 Q. B. D. pp. 441-560, and 30 Chy. D. pp. 1-191.

GIFT OF CHATTELS—PARENT AND CHILD.

Taking up the cases in the Queen's Bench Division, the first that calls for notice is that of *In re Ridgway*, 15 Q. B. D. 447, which, although a bankruptcy case, is one involving a principle which is of general interest. The bankrupt had, in 1866, shortly after the birth of his son Thomas, purchased a pipe of wine, which he had bottled and laid down in his cellar, and from that time it remained intact, with the exception that a bottle was occasionally used in the family to test its condition. The wine was always known in the family as "Tom's wine." In 1885 the bankruptcy occurred, and the wine was still in the bankrupt's cellar, but was claimed by the son as against the trustee. Denman, J., held that there had been no perfect gift of the wine to the son, and that it remained the bankrupt's property and passed to his trustee. He considered that the bankrupt had formed the intention of giving it to his son at some future time without fixing in his own mind when that time would arrive, and had determined in the meantime to retain control over it, and the power of dealing with it as circumstances might require.

PRISONER—HABEAS CORPUS.

The next case we think worthy of notice here is that of *Weldon* v. *Neal*, 15 Q. B. D. 471, in which the plaintiff who has recently been conspicuous as a litigant in the English Courts applied for a *habeas corpus* to the keeper of a gaol in which she was a prisoner under sentence of six months' imprisonment for a libel, in order to enable her to appear in Court to argue in person a rule for a new trial. The Court (Grove and Manisty, JJ.), following *Benns* v. *Mosley*, 2 C. B. N. S. 116, refused the application.

PRODUCTION OF DOCUMENTS.

In *The London and Yorkshire Bank* v. *Cooper*, 15 Q. B. D. 473, the Court of Appeal affirmed the decision of the Divisional Court, 15 Q. B. D. 7; noted *ante*, p. 318.