

scribing or finding responsible subscribers as above mentioned," to subscribe for the shares in their names, and to authorize the directors to allot the shares to them, and register their names as shareholders. No one ever called on any of the applicants to subscribe or find subscribers for any shares, but on April 27th, 1893, the shares were allotted to them, and they were entered on the register as shareholders. One of the applicants had by letter repudiated his liability to take shares, and the others had done so verbally. On July 31st, 1893, a winding-up order was made, and the liquidator placed the applicants on the list of contributories in respect of the shares which had been thus allotted to them. Williams, J., however, was of opinion that, as the applicants had never actually been called on to subscribe, or find subscribers for the shares, the condition precedent on which their liability depended had never been performed, and, therefore, that the applicants' names must be removed from the list.

The Law Reports for September comprise (1894) 2 Q.B., pp. 553-715; (1894) P., pp. 253-265; (1894) 2 Ch., pp. 478-633; and (1894) A.C., pp. 289-455.

MARRIED WOMAN—SEPARATE ESTATE—RESTRAINT AGAINST ANTICIPATION—EXECUTION LIMITED TO SEPARATE ESTATE—EQUITABLE EXECUTION—RECEIVER—SEQUESTRATION—MARRIED WOMEN'S PROPERTY ACT, 1882 (45 & 46 VICT., c. 75), s. 1, s.ss. 1, 2, 3, 4; s. 19—(R.S.O., c. 132, ss. 3, 20).

*Hood Barrs v. Catchcart*, (1894) 2 Q.B. 559; 7 R. Sept. 93; 9 R. Sept. 199, is an important deliverance of the Court of Appeal (Lord Esher, M.R., and Smith and Davey, L.JJ.) in reference to the Married Women's Property Act, 1882. In this case judgment had been recovered against the defendant, a married woman, execution being, in the usual terms, limited to her separate estate, and an order had been made appointing a receiver by way of equitable execution to receive the income of certain property to which the married woman was entitled for her life, subject to a restraint against anticipation. She applied to set aside the order, but the Divisional Court refused to set it aside; her appeal from that court, however, was successful, the Court of Appeal holding that the restraint against anticipation effectually prevented the income of the property to which it referred from being made available in execution, either by means of a receiver or of a sequestration, and that even the arrears