his marriage had been dissolved, and alternatively for a dissolution of the marriage on the ground of the alleged misconduct of his wife. The suit had been dismissed on the ground that the applicant was not domiciled in England; but Deane, J., intimated that he considered the marriage had been dissolved, and there being no subsisting marriage the Court could not pronounce the decree asked. The applicant then applied to the registrar for a marriage license which was refused. The Divisional Court (Lord Reading, C.J., and Darling, and Bray, JJ.), dismissed the application, holding that there had been no legal dissolution of the marriage of 1913, and that though the wife was suubject to the law of her husband's domicile, she was not subject to the law of his religion, and therefore the pretended divorce was inoperative, and with this conclusion the Court of Appeal (Eady, and Bankes, L.JJ., and Lawrence, J.), agreed. Their lordships point out that although according to Mahomedan law the applicant might dissolve a Mahomedan marriage, there was nothing to shew that by that law he could dissolve a Christian marriage.

ADMINISTRATION DE BONIS NON—WILL—CONSTRUCTION.

Re Griffiths, Morgan v. *Stephens* (1917) P. 59. This was an application for the grant of letters of administration *de bonis non* of the estate of William Griffiths, in the following circumstances. The testator by his will gave all his property to his wife "during her widowhood" and after her death to the child or children, "Issue of our marriage." Should the widow marry the property was to devolve on "the offspring of our marriage:" and if the issue of the marriage should die, then, on the remarriage of the wife, the testator directed the property was to go over to "the legal next of kin and heirs descendants of my family." There was no appointment of an executor. The widow did not marry again. There was only one child of the marriage, and he predeceased the widow. The widow died in 1915 leaving a will which was proved by the executrices named therein —who also took out letters of administration to the estate of the deceased child of the testator, and they now opposed the application of one of the next of kin of William Griffiths for letters of administration *de bonis non* of his estate. Low, J., held that the child of the testator did not take a vested interest, but only an interest contingent on his surviving the remarriage or death