

PRIZE COURT—ENEMY CARGO—DISCHARGE IN PORT OF LONDON—
SALE OF CARGO LIABLE TO SEIZURE AS PRIZE—PROCEEDS OF
SALE—SEIZURE OF PROCEEDS.

The Glenroy (1918) P. 82. In this case Evans, P.P.D., held that where enemy's goods liable to seizure as prize are brought to the Port of London and sold, the proceeds of such goods are liable to seizure and condemnation as prize.

JURISDICTION — DIVORCE — FOREIGN DOMICILE OF HUSBAND —
BRITISH PROTECTED SUBJECT—RESIDENCE IN EGYPT.

Casdagli v. Casdagli (1918) P. 89. This was an action for divorce by a wife against her husband in which the latter raised the objection that the English Court had no jurisdiction, because he was domiciled in Egypt. It appeared that the defendant was a British subject, born in England in 1872, and that since 1895 he had resided in Egypt, and was a registered protected British subject, subject to the jurisdiction of the British Consular Courts there. These Courts had no matrimonial jurisdiction in divorce. The Court of Appeal (Eady, Warrington, and Scrutton, L.J.J.) held (Scrutton, L.J., dissenting) that the husband had not acquired a new Egyptian domicile of choice, and that his domicile of origin remained, and therefore that the English Court had jurisdiction.

WILL—CONSTRUCTION—GIFT TO PERSONS ATTAINING AGE OF
TWENTY-FIVE—DATE WHEN AGE REACHED.

In re Shurey, Savory v. Shurey (1918) 1 Ch. 263. The simple question in this case was at what date a person attains a given age. The question arose on the construction of a will, whereby the testator gave his residuary estate to his three sons and two others named, "as shall attain the age of twenty-five." The eldest son Charles was born on July 22, 1891, and died on July 21, 1916, being the day preceding the twenty-fifth anniversary of his birth. Sargant, J., held that he had attained 25 years, according to law, although according to ordinary parlance a person is not supposed to attain 25 until the twenty-fifth anniversary of the date of his birth.

COMPANY—DIRECTOR—MISFEASANCE—PAYMENT OF DIVIDENDS
OUT OF CAPITAL—LOST CAPITAL—SUBSEQUENT APPRECIATION
OF CAPITAL ASSETS—LIABILITY TO RECOUP LOST CAPITAL
BEFORE PAYMENT OF DIVIDENDS—FIXED CAPITAL—FLOATING
CAPITAL.

Ammonia Soda Co. v. Chamberlain (1918) 1 Ch. 266. This is an important decision on questions of company law. The action