

the settled shares to any of his six children absolutely, notwithstanding the previous trusts. In 1881 the trustee paid to each of the five sons one half of his share, and to the daughter one sixth of her share absolute, and he also set aside for the daughter and her children a sufficient sum of stock at its then value to make up, with the sum advanced, one-half of the daughter's share, and the income of this stock was paid to the daughter till her death in 1896. Stirling, J., held that this was a valid appropriation of the stock to the daughter's share, and that the distribution to her children ought to proceed on that footing.

MARRIED WOMAN—SEPARATE ESTATE—MORTGAGEE—CONVEYANCE.

In re Brooke & Fremlin (1898) 1 Ch. 647, was a matter under the Vendor's and Purchaser's Act, in which the point presented for adjudication was whether a married woman, who under the Married Woman's Property Act, 1882, (see R.S.O. c. 163, s. 3, Ib. c. 165, s. 3) was entitled as mortgagee, could make a valid conveyance of the mortgaged estate without the concurrence of her husband, or acknowledgment of the deed under the Fines and Recoveries Act, and he held that she could.

FORFEITURE—LANDLORD AND TENANT—BREACH OF COVENANT—NOTICE OF BREACH OF COVENANT BY TENANT, SUFFICIENCY OF—RE-ENTRY—CONVEYANCING AND LAW OF PROPERTY ACT, 1881 (44 & 45 VICT. C. 41) S. 14—(R.S.O. C. 170, S. 13).

In re Serle, Gregory v. Serle (1898) 1 Ch. 652, shows that where a landlord gives notice of breach of covenant by tenant, with a view to enforcing a right of re-entry, the notice under the Act (see R.S.O. c. 170, s. 13) must be specific as to all of the breaches complained of, and that a notice to the tenant that he "has not kept the said premises well and sufficiently repaired, and the party and other walls thereof," is nugatory, and the fact that other breaches of covenant which are complained of are sufficiently specified, will not make the notice sufficient. In arriving at this decision Kekewich, J., follows *Fletcher v. Nokes*, (1897) 1 Ch. 271, noted ante, vol. 33, p. 388.