

on this side of the Atlantic some years ago, by baseless fears for his personal safety injudiciously expressed by Lord Lorne. No such untoward event can possibly supervene during the American tour of Lord Russell, and he should not be permitted to return home without having seen the wonders of this splendid portion of the Greater Britain that is soon to be. The initiatory step towards this consummation might be most becomingly taken by the Benchers of the Law Society of Upper Canada. "It is sweet and honourable to di(n)e for one's country!"

CHARLES MORSE.

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## ENGLISH CASES.

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### EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

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INJUNCTION—LANDLORD AND TENANT—IMPLIED OBLIGATION—COMMON SCHEME—RESIDENTIAL FLAT.

*Hudson v. Cripps*, (1896) 1 Ch. 265, was an action by a tenant of a residential flat against her landlord, to restrain him from converting the residue of the building in which the flat was situated into a club, on the ground that the plaintiff's tenement was let in accordance with a general scheme, under which the whole building, with some slight exceptions, was occupied as residential flats, as evidenced by certain regulations and conditions annexed to the agreement under which the plaintiff held. The plaintiff applied for an interlocutory injunction, which was granted by North, J., on the ground that what the defendant proposed to do was a violation of the agreement under which the plaintiff held.

TRUSTEE RELIEF ACT—PAYMENT INTO COURT BY ADMINISTRATOR—SUBSEQUENT DISCOVERY AND PROOF OF WILL—PAYMENT OUT OF MONEY IN COURT TO EXECUTOR.

*In re Hood's Trusts*, (1896) 1 Ch. 271, money had been paid into Court under the Trustee Relief Act by an executor, to the credit of several infants who were some of the next of