

REVIEW OF CURRENT ENGLISH CASES.

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CONFLICT OF LAWS—FOREIGN SUBJECT—FOREIGN WILL—ENGLISH DOCUMENT—CONSTRUCTION—JURISDICTION.

In re Bonnefoi, Surrey v. Perrin (1912) P. 233. This was an action in the Probate Division. An Englishwoman domiciled in Italy, died leaving a letter, which according to Italian law, was a valid will. She left personalty in Italy and England, the larger part being in England. Her sisters brought the present action for administration, whereupon those claiming under the Italian will commenced proceedings in Italy, and applied to stay the present action, which application was granted by Evans, P.P.D.; but the Court of Appeal (Cozens-Hardy, M.R., and Farwell, and Kennedy, L.JJ.), held that the action ought not to be stayed, because there was no doubt that the Italian law governed, and the only question was as to the meaning of the Italian will, which, being in English, an English court was better qualified to construe it than an Italian.

HEARING IN CAMERA—PUBLICATION BY ONE OF THE PARTIES OF EVIDENCE TAKEN IN CAMERA—CONTEMPT OF COURT—APPEAL.—CRIMINAL CAUSE OR MATTER.

Scott v. Scott (1912), P. 241. This was an action for nullity of marriage which had been ordered by the court to be heard *in camera*. After the conclusion of the hearing the plaintiff's solicitor, by her instructions, procured copies of the evidence which he sent for the plaintiff's justification to the father and sister of the respondent. An application was then made by the respondent to commit the plaintiff and her solicitor for contempt of court in thus publishing the evidence taken *in camera*. On the return of the motion the petitioner and her solicitor apologised, but were ordered to pay the costs of the motion. From this order they appealed, but the Court of Appeal (Cozens-Hardy, M.R., Williams, Moulton, Farwell, Buckley, and Kennedy, L.JJ.) held that the order to hear the cause *in camera* was made to assist the court in the administration of justice, not to affect the civil rights of the parties, and that the breach of it was criminal in its nature and the order in appeal was a judgment in a criminal cause or matter and therefore not appeal-