£803. By a local Act of New South Wales, extensive powers of management of the property of "lunatic patients" (*i.e.* persons detained as lunatics, but not so found by inquisition), were given to the Master in Lunacy in New South Wales, and he was entitled to sue for, and receive debts due to, the patient, but the Act did not vest the patient's property in him. The Master claimed to have the accumulations which were in England paid to him, upon which the trustees paid them into court, under the Trustee Relief Act. The Master then petitioned to have them paid out to him. Kay, J., ordered the £803 to be paid to him, and also the income of the remainder of the fund, as long as the person entitled should be detained as an insane patient in New South Wales, and authorized the trustees to pay him the patient's share of the income of the residuary estate, which the trustees undertook to do. The Master in Lunacy appealed from this order, but the Court of Appeal (Cotton, Bowen and Fry, L.JJ.) held that, though in New South Wales the Master could enforce payment of any sums due to the patient, still, as the patient had not been found lunatic, and the property was not vested in the Master, he could not compel payment of any money due to the patient from persons in England, and his claim to have the whole of the accumulations paid to him was refused. But it was held that the English trustees were justified in paying over to the Master anything which the competent authority of New South Wales decided to be necessary for the maintenance or benefit of the patient, and the payments which had been directed, were upheld, but no case having been made to shew that more was required for the comfort or benefit of the patient, it was held that Kay, J., was right in refusing to order anything further to be paid. We believe a similar point was recently before Proudfoot, J. in the Chancery Division in *Charteris* v. *Charteris*, in which the question was whether the corpus of a fund in the province to which a lunatic resident in Scotland was entitled, should be paid to her *curator bonis* in Scotland, and he held that the mere fact that he was *curator bonis* did not entitle him to receive the corpus.

CHATTEL MORTGAGE—AFTER-ACQUIRED PROPERTY—UNCERTAINTY.

In re Clarke, Coombe v. *Carter*, 36 Chy. D. 348, the Court of Appeal affirmed the decision of Kay, J., 35 Chy. D. 109. In this case a mortgagor, by deed assigned to the mortgagee all his household goods and farming stock, and "also all moneys of or to which he then was or might during the security become entitled under any settlement, will, or other document either in his own right, or as the devisee, legatee, or next of kin of any person," and also all real and personal property "of, in, or to which he was, or during that security should become beneficially seized, possessed, entitled or interested, for any vested, contingent, or possible estate or interest." The mortgagee having afterwards become entitled under a will to a share of the personal estate of the testator, the question arose between the trustee in bankruptcy of the mortgagor's estate and the mortgagee, whether this share passed under the assignment of after-acquired property. It was contended on behalf of the liquidator that the clause purporting to assign after-acquired property was too vague. But the Court of Appeal (Cotton, Bowen