

As a matter perhaps worth mentioning in connection with this, I have noticed several instances in our statutes, where sections without any sub-sections, are numbered as sub-sections, (1), in addition to their proper numbering as sections.

Before closing, permit me to direct the attention of the student to the report of the Commissioners to whom was entrusted the work which resulted in "The Revised Statutes of Ontario, 1877." This will be found in a convenient form in Vol. XI., p. 7 of the CANADA LAW JOURNAL. It is a carefully prepared and instructive document, and will well repay perusal. And for able and interesting articles touching upon some of the matters I have been discussing see "Acts of Last Session," and "Private Bills," at pages 35 and 68 respectively, of the same volume of the LAW JOURNAL.

EDWARDS MERRILL.

Picton.

ENGLISH CASES.

EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

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TRUSTEE ACT, 1893 (56 & 57 VICT., C. 53, S. 12), S.S. 1—(R.S.O., C. 110, S. 4, S.S. 1)
—TRUSTEES FOR PERFORMING THE TRUST—VESTING DECLARATION—MORTGAGE.

In *London & County Banking Co. v. Goddard* (1897), 1 Ch. 642, a mortgagor of land by deposit of title deed declared himself trustee of the legal estate for the mortgagee, and also gave the manager of the mortgagee power to remove him from the office of trustee and appoint a new trustee. In pursuance of this power a new trustee was appointed in place of the mortgagor, and a vesting declaration may by the appointor, under the Trustees Act, 1893 (56 & 57 Vict., c. 53, s. 12, sub-sec. 1 (R.S.O., c. 110, s. 4, sub-sec. 1)). The mortgagor subsequently purported to convey the legal estate to a subsequent encumbrancer, with notice of the prior mortgage, and the question was whether the vesting declaration had the effect of vesting the legal estate as against the mortgagor's