COMPANY—PROSPECTUS—UNTRUE STATEMENTS IN PROSPECTUS—DIRECTOR—DEATH OF DIRECTOR—ACTIO PERSONALIS MORITUR CUM PERSONA.

Giepel v. *Peach* (1917) 2 Ch. 108. This was an action brought against the personal representative of a deceased director of a limited company, to recover damages arising from untrue statements contained in the company's prospectus. Sargant, J., who tried the action, held that in the absence of any evidence shewing that property, or the proceeds or value of property belonging to the plaintiff, had, by reason of the tortious act complained of been added to the deceased director's estate, the maxim *actio personalis moritur cum personâ* applied, and the action would not lie.

WILL—LEGACY—CONDITION THAT LEGATEE SHALL NOT BE A ROMAN CATHOLIC—INFANT—ELECTION OF RELIGION—WHEN TO BE MADE—GIFT OVER.

In re May, Eggar v. *May* (1917) 2 Ch. 126. By her will a testatrix bequeathed two legacies of £5,000 each to two nephews on their attaining 24, conditioned on their not being Roman Catholics, or, being Roman Catholics at the time of her decease, should cease to be so before the expiration of twelve months after the testatrix's death. At the time of the death both legatees were infants. Their father was a Roman Catholic, and both infants had been baptized according to the rites of the Roman Catholic Church. There was a gift over in the event of the condition not being complied with. More than a year had elapsed since the testatrix's death and the legatees continued to be brought up as Roman Catholics, and the question Neville, J., was called upon to decide, was whether or not the gift over had taken effect. He held that so long as the legatees were under the age of 21 they were not bound to make any election as to their religion, and it would be open to them after they attained 21, and before attaining 24, to elect whether or not they would be, or remain Roman Catholics.

WILL—DIRECTION TO PAY ANNUITY "FREE OF ALL DUTIES"—INCOME TAX.

In re Saillard, Pratt v. *Gamble* (1) (1917) 2 Ch. 140. The question in this case was whether an annuity bequeathed to a solicitor as compensation for his trouble in acting as executor "free of all duties," was to be paid free from income tax. Neville, J., decided in the negative.