

had never existed. It is true that a wife's choses in action could only be recovered by the legal personal representatives of the wife, but they were not in any way subject to the provisions of the Statute of Distributions (22 & 23 Car. 2, c. 10), it being expressly provided by s. 25 of the Statute of Frauds (29 Car. c. 3) that the Statute of Distributions "shall not extend to the estates of feme coverts who shall die intestate, but that their husbands may demand and have administration of their rights, credits, and other personal estates and recover and enjoy the same as they might have done before the making of the said Act." If letters of administration to the wife were granted to one of her next of kin, the administrator of the wife was held to be a trustee for the legal personal representative of the husband: (see *Humphrey v. Bullen*, 1 Atk. 459). The Married Women's Property Act 1882, s. 1, sub-s. 1, provides that "a married woman shall in accordance with the provisions of this Act be capable of acquiring, holding, and disposing by will or otherwise of any real or personal property as her separate property in the same manner as if she were a feme sole without the intervention of any trustee." But the Act does not deal with the devolution of property undisposed of by her. With regard to her real estate, it was decided in *Hope v. Hope* (66 L.T. Rep. 522; (1892) 2 Ch. 336), on the same principle, that, notwithstanding the provisions of the Married Women's Property Act 1882, a husband is still entitled on the death of his wife to an estate by the courtesy in her undisposed-of real estate.—*Law Times*.

ANOMALIES IN THE LAW OF LIGHT.

A mass of judicial decisions and a single Act of Parliament constitute the code of law to which we have to look for our law of light. Lord Macnaghten has aptly described the judge-made portion of this code as "an embarrassing chain of authority," and the Legislature's sole contribution has been described by Lord Halsbury as an Act "which illustrates the danger of attempting to put a principle of law into the iron framework of