

been recovered or preserved by the solicitor's exertions. The Chancery Divisional Court at its recent sittings, we believe, came to a similar conclusion in the case of *Flett v. Way*.

CONTRACT—JOINT CONTRACTORS—MARRIED WOMAN A JOINT-CONTRACTOR—JUDGMENT AGAINST ONE JOINT-CONTRACTOR—RES JUDICATA.

In *Hoare v. Niblett* (1891), 1 Q.B. 781, an attempt was made to establish an exception from the general rule, that a judgment against one of two or more joint-contractors discharges the rest in the case where one of the joint-contractors was a married woman, contracting in respect of her separate property; but the Court (A. L. Smith and Grantham, JJ.) decided that the exception could not be maintained.

BANK OF ENGLAND—MANDAMUS—LIST OF STOCK TRANSFERRED TO NATIONAL DEBT COMMISSIONERS—INSPECTION BY PERSON WITHOUT INTEREST.

In *The Queen v. Bank of England* (1891), 1 Q.B. 785, an application was made for a mandamus to compel the Bank of England to permit the applicant to inspect a list of unclaimed stock, transferred under Act of Parliament to the National Debt Commissioners. The applicant claimed no personal interest in any stock so transferred, but desired to obtain information for the purpose of his business, which was that of a "next of kin and unclaimed money agent." According to the statute directing the transfer, the bank were required to keep a list of stock so transferred, which list is to be "open for inspection at the usual hours of transfer." The Court (A. L. Smith and Grantham, JJ.) refused the application, being of opinion that as the applicant had no *bona fide* interest in any stock transferred, he had no right to claim to inspect the list; and the motion was therefore refused. It appears from this case that no stock is transferred by the bank until every reasonable effort has been made to find the owner; and that the lists published by agents, to a large extent, refer to stock which has long since found claimants.

STATUTE—CONSTRUCTION.

*Fletcher v. Fields* (1891), 1 Q.B. 790, was a case stated by justices, the point of law involved arising on the construction of a statute prohibiting the loading or unloading of "coal" on or across a footway between certain hours, and imposing a penalty for breach of its provisions. The question was, whether "coke" was included in the term "coal." A. L. Smith and Grantham, JJ., held that the statute being a restriction of the liberty of the subject was not to be extended beyond its precise terms.

WILL—TRUST FOR IMPROVEMENT OF LANDED ESTATE—ACCUMULATION—THELLUSSON ACT (39 & 40 GEO. 3, C. 98)—(52 VICT., C. 10, S. 2).

In *Vine v. Raleigh* (1891), 2 Ch. 13, the question arose as to the effect of the will of a testator, which directed that his residuary estate should be laid out in the purchase of a landed estate, and out of the income thereof that an annuity should be paid to his nephew for life, and that the surplus income should, during the life of the nephew, be expended in the purchase of additional land "or in the