of Friendly Societies, the mortgaged property in question was included in the "properties of which the society are in possession as mortgagors." The society having been ordered to be wound up, the mortgagor claimed to be entitled to the surplus rents in the hands of the society. This claim was based on the ground that the society were trustees of the fund and therefore the Statute of Limitations 37-38 Vict. c. 57, s. 7 (see 10 Edw. VII. c. 34, s. 20 (Ont.)) did not apply. But Neville, J., held that, notwithstanding the form of the mortgage, as creating a trust, it was in fact only a mortgage and the Statute of Limitations as in the case of other mortgages began to run as against the mortgagor from the time the mortgagees went into possession in 1887, and as the plaintiffs could not recover the land, neither could they recover the surplus rents. He also said that the annual statutory accounts above referred to were not acknowledgments of the mortgagor's title. The learned Judge calls attention to the following statement in Fisher on Mortgages, 5th ed., s. 1404: "Time will not run in the case of a common mortgage until the day of redemption has arrived; for the mortgagor cannot redeem before that day: *Brown* v. *Cole*, 14 Sim. 627"; and points out that the time, according to the statute s. 7, begins to run from the time a mortgagor enters into possession, which may in some cases be before the day fixed for redemption.

Licensing Act—"Second offence."

The King v. *Justices of South Shields* (1911) 2 K.B. 1. This case is deserving of a brief notice for the fact that a judicial interpretation is given therein to the meaning of the words "second offence" in a Licensing Act. The Court of Criminal Appeal, Lord Alverstone, C.J., and Ridley, and Channell, JJ., came to the conclusion that the expression means a second or subsequent offence committed after a previous conviction and does not mean a second offence in point of time merely.