

orders do not have the effect of creating a debt from the father, but impose a purely personal liability on him, and that on his death neither the arrears nor future payments are recoverable from his estate. R.S.O. c. 165, s. 1 also seems to create a statutory liability on the part of the putative father only, and not one that could be enforced against his estate, unless in the case where a judgment has been actually recovered against him under that section in his lifetime.

WILL—CONVERSION OF PERSONALTY INTO REALTY—DIRECTION TO HOLD PROCEEDS OF PERSONALTY ON TRUSTS AND IN MANNER APPLICABLE IF THEY HAD ARISEN FROM SALE OF REALTY.

*In re Walker, Macintosh-Walker v. Walker* (1908) 2 Ch. 705. Parker, J., held that a declaration that personalty shall devolve or pass to persons successively as realty (though in cases of doubtful construction it may help the court to construe the instrument as creating an imperative trust for conversion) is not per se operative, and consequently a bequest of personalty on trust for sale and to hold the net proceeds "upon the trusts and in the manner upon and in which the same would be held and applicable if they had arisen from a sale of" freehold hereditaments by the same will, "devised in settlement under the Settled Land Act, 1882," is not an operative trust, and the person who first took the settled land in tail became entitled absolutely to the personalty so bequeathed.

TRADE MARK—PASSING OF GOODS—"CHARTREUSE"—FRENCH LAW OF ASSOCIATIONS—VESTING OF FRENCH BUSINESS UNDER FRENCH JUDGMENT—EFFECT OF FRENCH JUDGMENT ON ENGLISH TRADE MARK.

*Rey v. Lecouturier* (1908) 2 Ch. 715 was an action by the representative of Carthusian monks to restrain the infringement of their trade mark of "Chartreuse" as applied to a liqueur. The monks formerly resided in Chartreuse in France and by a secret process manufactured a liqueur which was called "Chartreuse," and which name they had registered in England as a trade mark. Under the French law of associations the plaintiffs were compelled to quit France, and their trade and trade marks were under a judgment of a French court vested in a liquidator by whom they were sold to the defendants who continued to carry on the manufac-