COMPANY—WINDING-UP—LIQUIDATOR—REMOVAL OF LIQUIDATOR —"CAUSE SHEWN"—COMPANIES ACT 1908 (8 EDW. VII. c. 69), ss. 149, 152—(R.S.C. c. 144, s. 32).

In re Rubber & Produce Investment Trust (1915) 1 Ch. 382. This was an application to remove a liquidator in a winding-up proceeding. The winding-up order had been made on a contributories petition containing serious charges of misfeasance against the directors; and a liquidator and a committee of inspection were appointed for the purpose of making a thorough investigation. At that time the company was apparently solvent with a balance for contributories which might possibly be increased by misfeasance proceedings. Subsequently a large claim was admitted and it was found, notwithstanding anything which might be recovered by misfeasance proceedings, that the company was hopelessly insolvent. The liquidator and committee bonâ fide and in pursuance of what they believed to be their duty continued to treat the liquidation as a contributories' liquidation and proposed to spend the creditors' assets in misfeasance proceedings contrary to the wishes of the creditors. In these circumstances Astbury, J., was of the opinion that sufficient cause was shewn for removing the liquidator under the Companies Act, 1908, s. 149 (*b*)—(R.S.C. c. 144, s. 32).

ELECTION—BEQUEST TO SPINSTER—BEQUEST TO MARRIED WOMAN —RESTRAINT ON ANTICIPATION.

In re Tongue, Higginson v. *Burton* (1915) 1 Ch. 390. By the will of a testatrix in question in this case certain personal property to which, as the judge found, the testatrix's daughters were entitled, was bequeathed by her to her four nephews and nieces and by the same will she bequeathed her residuary estate to her four daughters, three of whom were married, and one of whom was a spinster; the shares bequeathed to the married daughters were settled and were subject to a restraint against anticipation. The question was whether the daughters or any of them were, in these circumstances, put to their election whether they would take under the will or not, and Warrington, J., decided that the married daughters by reason of the restraint on anticipation could not be required to elect, but that the unmarried daughter was put to her election. As to the shares of the married daughters the learned judge says: "the testatrix, by imposing the restraint on anticipation has shewn