

to keep them, relying principally on the case of *Bridges v. Hawkesworth*, 21 L. J. (Q.B.) 75. In that case a parcel of notes had been found in the public part of a shop, and it was held that the finder was entitled thereto as against the shop keeper, on the ground that the notes were never in the custody of the shop keeper, or "within the protection of his house." The Court (Lord Russell, C.J., and Wills, J.), however, distinguished that from the present case, on the ground that in general the possession of the land carries with it the possession of everything which is attached to or under that land, and in the absence of a better title elsewhere, the right to possess it also. And it makes no difference that the possessor is not aware of the thing's existence. It might be said that this rule is equally applicable to the shop keeper's case, and that being on his land, the notes as against the finder and every one but the true owner, were his property. The distinction based on the notes being in the "public part of the shop" seems an over nice one, and it looks very much as if *Bridges v. Hawkesworth* has in fact been overruled under the guise of being "distinguished."

HUSBAND AND WIFE—JUDGMENT AGAINST MARRIED WOMAN—SEPARATE ESTATE—
RESTRAINT ON ANTICIPATION—ARREARS OF INCOME DUE AFTER JUDGMENT—
MARRIED WOMAN'S PROPERTY.

In *Whiteley v. Edwards*, (1896) 2 Q.B. 48, the Court of Appeal (Lord Esher, M.R., and Smith, L.J.) has determined that, notwithstanding the decision of the House of Lords in *Hood Barrs v. Heriot*, (1896) A.C. 174, noted ante, p. 576, the judgment creditor of a married woman is not entitled to the appointment of a receiver to receive the arrears of income of the separate estate of the married woman, subject to a restraint on anticipation, which have accrued and become payable to her subsequent to the recovery of the judgment. The distinction which the Court makes between *Hood Barrs v. Heriot* and the present case is that in the *Hood Barrs* case the arrears of income were due at the date of the judgment. In the present case they had accrued subsequent to the date of the judgment. Smith, L.J., summarises the result of the cases as follows: "If the income of the settled property is due at the