

PRIZE COURT—OUTBREAK OF WAR—BRITISH SHIP WITH CARGO
FOR ENEMY COUNTRY—VOYAGE DIVERTED—SEIZURE OF
CARGO—CLAIM FOR FREIGHT.

The Iolo (1916) P. 206. This case involves a similar question to that in the preceding case. Shortly before the outbreak of war the *Iolo* a British ship left a Russian port in the Black Sea with a cargo of grain for Hamburg, and, at the suggestion of the British Admiralty, her owners diverted the vessel to a British port, where the cargo was seized, and subsequently sold, and the proceeds paid into Court. A Russian bank as owners claimed part of the cargo, and the amount was ordered to be paid to the bank, subject to the claim of the shipowners for freight and charges, and it was held by Evans, P.P.D., that although at common law no freight was due, as the contract of affreightment had not been carried out, and had become illegal by reason of the war, nevertheless, the Prize Court acting on equitable principles would allow a fair and reasonable sum for freight or charges, the amount to be ascertained by a reference on the principle laid down by the Court in *The Juno*, 1916, P. 169.

WILL—CONSTRUCTION—"ALL LEGACIES AND BEQUESTS TO BE
PAID FREE OF ALL DEATH DUTIES"—GIFT OF ANNUITY OUT
OF RESIDUE.

In re Kennedy Corbould v. Kennedy, (1916) 2 Ch. 379. By the will in question in this case the testator gave certain specific and pecuniary legacies, and life annuities, and declared that all legacies, annuities and bequests bequeathed by his will should be given and paid free of all death duties; and he gave his residuary estate in trust for sale and conversion, and directed his trustees to pay his funeral and testamentary expenses, death duties, debts, legacies and annuities, out of the proceeds, and invest the residue thereof, and hold the same upon trust to pay the annual sum of £500 each to A and B during the life of C and D, and, subject thereto, upon trust for C and D successively for life with remainder to A and B absolutely in equal shares. The question was whether the life interests and the specific annuities given out of the residuary estate were freed from death duties, and Astbury, J., held that they were not.

WILL—CONSTRUCTION—LEGACY TO SERVANTS—FARM LABOUR-
ERS.

In re Forrest, Bubb v. Newcomb (1916) 2 Ch. 386. By the will in question in this case the testator bequeathed "to each of my