"notwithstanding anything by the person who so conveys *or any one through whom he derives title otherwise than by purchase for value*," the grantor has power to convey, etc. This point may yet arise in *Ontario Asphalt* v. *Montreuil*, 29 O.L.R. 534, see p. 552, where the Chief Justice of Ontario says that a conveyance in fee simple by a life tenant under a will would render him liable to an action on the covenants for title and quiet enjoyment if the remainderman should evict the grantee. In a conveyance under the Short Forms Act there would be no covenant for title, and the covenants for right to convey and for quiet possession appear to be limited to acts or defaults of the grantor. The remaindermen, in that case, would claim by a title contemporaneous with the life tenant's and not created by him, and apparently, therefore he would not be liable to the purchaser if the latter were ejected, as it would not be due to anything done or suffered by the grantor. The cases of *Harry* v. *Anderson*, 13 U.C.C.P. 476, and *Re Fennedy*, 26 Gr. 33, illustrate this principle, though, in view of the doubts expressed in the latter case and of the interpretation of the words, "knowingly or wilfully suffered or permitted," in *Eastwood* v. *Ashton* (1913), 2 Ch. 39, it is questionable whether the precise point—the liability under the grantor's covenant for taxes accrued prior to his title—would be decided in the same way at the present time.

April, 1914. SHIRLEY DENISON.

WHEN LYNCH LAW BECOMES A NECESSITY.

The public are again being told that the British Government is at last beginning to wake up to the condition of things resulting from its apathy and utter stupidity in connection with the militant suffragette outbreak in England; but, so far as one can see at present, Judge Lynch is the only resource to cope with the situation. The incapacity of the present government in this and perhaps other matters has made England a laughing stock to other nations, and has brought humiliation to its citizens. This apathy