

tended in any way to interfere with, or be inimical to any existing association or local system of law, but is rather the natural outcome and the due complement of Provincial Associations.

It is worthy of note that the large number of the Bar, viz., about 300, present at the meeting in Montreal, at a time which was not convenient for many, is a good indication of the interest which has already been evoked by the movement.

The place for the next meeting has not as yet been determined. Possibly the capital city of the Dominion would be an appropriate place, and if held when Parliament is in session, and during the sittings of the Supreme Court, many of the leading men from all the Provinces would naturally be present, and the best thought would be likely to be evolved.

The idea is a national one. The Association has been commenced on broad lines. It remains for the profession throughout Canada to maintain it in the same broad spirit, and to lend the utmost aid to the executive in carrying its plans to success.

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## ENGLISH CASES.

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### EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

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ESTATE PUR AUTRE VIE—SPECIAL OCCUPANT—DEVOLUTION OF ESTATES PUR AUTRE VIE—WILLS ACT (1 VICT., C. 26), SEC. 6—STATUTE OF FRAUDS—(29 CAR. II., C. 3) SEC. 12.

*Mountcashell v. Morc-Smyth*, (1896) A.C. 158, involved a neat little question of real property law. The appellant and respondent were tenants pur autre under a conveyance to them and their heirs upon certain trusts, subject to a declaration that all the estates and interest conveyed to the respondent were conveyed to her as trustee for an infant. This infant having died, the respondent as administratrix of the deceased infant brought this action for an account against the appellant. The action was resisted on the ground that the respondent's estate as trustee was an estate of quasi fee, a descendible