

BANKRUPT—ESTATE VESTED IN BANKRUPT UPON SECRET TRUST FOR OTHERS.

Heritable Reversionary Company v. Millar, (1892) A.C. 598, consumes twenty-seven pages of the reports to establish what might be thought the very elementary principle that when an estate is vested in a bankrupt by an absolute disposition registered in his own name, but which, it appeared, he held only as trustee for others to whom he had given an unrecorded acknowledgment of the trust, such estate does not vest in the bankrupt's trustee for the benefit of his creditors. But then, we may observe, the Scotch Court of Sessions had taken the opposite view.

EVIDENCE—HISTORICAL FACTS.

Read v. The Bishop of Lincoln, (1892) A.C. 644, although an ecclesiastical case dealing with questions of ritual to which it is needless to refer to here, also confirms a very important principle in regard to the law of evidence, and one which was only the other day applied by Boyd, C., in the *Queen Victoria Park Commissioners v. Howard*, viz., that when it is necessary to ascertain ancient facts of a public nature, the law permits historical works to be referred to as evidence thereof.

Notes and Selections.

MESMERISM.—The following curious and interesting question is asked by *Law Notes*: "If A. mesmerizes B. and induces him to disclose his most private affairs, can B. have a summons for assault against A.? A metropolitan magistrate the other day declined to grant one. What is the remedy—a civil action for damages?" It has struck us on several occasions of late that before very long the difficulties of the magistrate and of the law may be very appreciably increased by the constant recurrence of questions connected with the conduct of hypnotizers, mesmerizers, and others of the kind toward patients, particularly females. The existence of a mysterious power for evil, in the nature of hypnotization, cannot be denied or ignored.—*Indian Jurist*.

THE difference between the English way of doing things and the Indian way of doing things in dealing with petty criminal cases is amusingly illustrated by a recent case that occurred at