

expense he has been put to in investigating the title. Sargant, J., held that that rule was not applicable in the present case, because the objection was not one of title, but of conveyance, and he decided that the purchasers were entitled to damages for loss of bargain, but not also to the costs of investigating the title.

**WILL—BEQUEST TO SERVANTS IN TESTATOR'S EMPLOYMENT AT DEATH—LUNACY OF TESTATOR—SERVANTS EMPLOYED BY COMMITTEE.**

*In re King Jackson v. Attorney-General* (1917) 2 Ch. 420. The only point for which we think it necessary to refer to this case is that Younger, J., decided that where a testator bequeaths legacies to servants in his employment at the time of his death, and subsequently becomes lunatic, servants employed by his committee and in attendance on him at the time of his death are not entitled to the benefit of such bequests.

**SOLICITOR AND CLIENT—ORDER OBTAINED BY CLIENT FOR TAXATION OF SOLICITOR'S COSTS—NEGLECT OF CLIENT TO PROSECUTE REFERENCE—LEAVE TO SOLICITOR TO SUE—SOLICITORS ACT 1843 (6-7 Vict. c. 73) s. 37—(R.S.O. c. 159, s. 38 (c))**

*In re Plummer* (1917) 2 Ch. 432. In this case a client had obtained the usual order to tax his solicitor's bill of costs. Having neglected to proceed with the reference with due diligence, the solicitor applied to rescind the order or for leave to sue: see R.S.O. c. 159, s. 38 (c). It may be remarked that in this case the order contained an unlimited stay of proceedings pending the reference, and notwithstanding its terms the learned Judge held that he could, by virtue of the inherent jurisdiction of the Court to prevent an abuse of its process, rescind the order unless the client within a limited time proceeded with the reference, and this order he accordingly made.