

marriage settlement binding her to settle after acquired property. *Ex p. Gilchrist*, (1886) 17 Q.B.D. 521, the Court of Appeal decided emphatically that a general power of appointment was not "property." In the present case, however, there is the circumstance of the gift over absolutely in default of appointment, which Kekewich, J., holds makes it "property" within the covenant; following *Steward v. Poppleton*, W.N. (1877) 29, notwithstanding *Townshend v. Harrowby*, (1858) 27 L.J. (Ch.) 553, to the contrary.

CROWN—JURA REGALIA—TREASURE TROVE - GRANT TO SUBJECT - FRANCHISES
—TITLE OF CROWN—JUS TEKIL.

Attorney-General v. British Museum (1903) 2 Ch. 598, was a suit on behalf of the Crown to recover certain ancient Celtic ornaments found in Ireland and subsequently sold by the owner of the land on which they were found to the British Museum, the Crown claiming to be entitled thereto as treasure trove. The land on which the articles were found had been granted by the Crown with all such franchises as the Crown could grant to the predecessor in title of those who owned the land at the time the articles in question were found. The articles were found together in a space nine inches square about fifteen or eighteen inches beneath the surface of the soil. Farwell, J., found as a fact that they had been intentionally concealed for the purpose of security probably about a thousand years ago. The suggestion of the defendants that they were votive offerings to some sea god, he held was not sustained, and he also held that the articles were treasure trove, the right to which was a prerogative right, and as such part of the flowers of the Crown, and did not pass under the grant of franchises. Whether they would pass under the grant of royalties he declined to say, but as the only grant of royalties proved was those relating to the office of vice-admiral, he held that at all events treasure trove was no part of such royalties. Judgment was therefore given in favor of the Crown.

SOLICITOR—PARTNERSHIP—LIABILITY FOR ACTS OF CO-PARTNER - SCOPE OF PARTNERSHIP—SOLICITOR TRUSTEE—FRAUD.

Tendring Hundred Waterworks Co. v. Jones (1903) 2 Ch. 615, was an action in which the plaintiffs sought to make a partner of a solicitor, who was trustee for the plaintiffs, responsible for the trustee's breach of trust. The defaulter was secretary of the