

such vehicles had a tendency to skid and voluntarily accepted the risk. This last point is somewhat important for passengers, but it appears from the judgment of Mr. Justice Walton that it must be shewn that the passenger knows that motor omnibuses will skid, notwithstanding every precaution and everything that can be done.—*Law Times*.

RECTIFICATION OF DEEDS.

The jurisdiction exercised by the court in reference to rectifying some mistake is obviously one to be handled with jealous care. In all such claims it is necessary to satisfy a somewhat reluctant court by means of very plain evidence that there has been a mistake at the time when the instrument was made, and that it is not a mere matter of the instrument in question operating in some way quite unexpected by the parties concerned. Here and there cases are to be found where the court has acted on some unchallenged parol evidence of the plaintiff only, but as a rule, there are produced various documents, such as drafts or letters to solicitors or counsel, to prove to the court the real intention of the parties.

A very recent accession to the authorities on this subject may be found in *Lady Hood of Avalon v. Mackinnon* (100 L.T. Rep. 330), where Mr. Justice Eve had to deal with a rather curious case. A certain marriage settlement in 1855 had settled some personal property on certain trusts during the joint lives of Lord Hood of Avalon and the plaintiff. After the death of either of them there was a trust for the survivor for life, and thereafter in trust for such issue of the marriage as Lord Hood and the plaintiff should by deed or will appoint. Mrs. M. and Mrs. A. were the issue of the marriage in question. In 1888 Lord Hood and the plaintiff irrevocably appointed one-half of the trust funds for Mrs. M. absolutely, and Mrs. M. settled this one-half upon certain trusts with a covenant as to after-acquired property. Lord Hood afterwards died. The plaintiff in 1902 by a deed-poll appointed, subject, however, to her life