

directs her executors to pay her 12*l.* a year for the maintenance of each cat so long as it shall live. Her long-haired white puss Louise, and her black-and-white puss Dr. Clausman, she gives to her handmaiden Elizabeth Willoughby, and her black ebony-and-white Oscar to Miss Lavinia Sophia Beck; and her executors are directed to pay them also 12*l.* a year for each of these pussies so long as they shall live. All the remainder of her pussies she gives to the said Ann Elizabeth Matthews, and she directs her executors to pay her out of the balance of the dividends of her father's Lambeth Waterworks shares 150*l.* a year for their maintenance so long as any of them shall live, 'but this is not to extend to kittens afterwards born.' There is also a direction to Ann Elizabeth Matthews to live out of this annuity in the village of Haylands (or elsewhere) in a cottage and garden for the maintenance of the said pussies, unless the Rev. William Martin Spencer is willing to permit the pussies to reside on the premises and in the garden at Pound.

There is an exquisite finish and roundness given to the bequest by that 'not to extend to kittens afterwards born.' The mind is almost unequal to grapple with the difficulties that would have arisen if, instead of this sweeping exclusion of all after-born kittens, she had, say, in the case of 'dear old' Titiens given the annuity in favour of Titiens for life, and after her death to all her kittens who should survive her. The first difficulty that strikes us is that 'kittens' is not a term which has any legal significance like 'issue' or 'children,' but probably the Court, dealing with a case of first impression, would feel itself constrained to hold that the term would not include 'grandkittens' or 'great grand-kittens.' There, however, would appear to arise a still greater difficulty. A gift to the 'children' or 'issue' of an individual *prima facie* means only the legitimate children or issue of that person. Could the claimants under the class of 'kittens of Titiens' contend to have their rights admitted under any inferior standard to that of legitimacy? If not, then by what expert evidence as to cat law, fortified by what oral testimony as to facts, could it be established that the issue of 'dear old Titiens' was born in cat-wedlock so as to answer the description according to the exacting standard of the English law of 'kittens afterwards born?' From these and many other deep and subtle difficulties we are saved by the merciful interposition of the words 'but this is not to extend to kittens afterwards born.'—*Law Journal* (London).