agreed to keep open, and on the other side of the passage were old buildings about twenty-five feet high also owned by the corporation. The corporation demised the land on the other side of the passage to the defendant, who tore down the old buildings, and on their site erected a house eighty feet high, which materially interfered with the plaintiff's light. The land on both sides of the passage was part of a large piece laid out by the corporation upon a building scheme for the improvement of the town, and of this scheme it was held that the plaintiff's assignor, Daniell, had notice. Under these circumstances it was held that there was no express or implied grant of any right to the access of light over the buildings on the other side of the passage, as the same existed at the date of the lease to Daniell. The action which was for a mandatory injunction to remove the obstructive building was therefore dismissed with costs. It was argued by counsel for the defendant that the doctrine that the grantor grants so much as is reasonably necessary for the complete enjoyment of the premises did not exist except where the tenement granted adjoined physically the tenement which was left in the hands of the grantor, and that in the present case the intervening passage of twenty feet between the two parcels of land prevented the application of the doctrine; but this argument was held untenable.

PRACTICE—MARRIED WOMAN SUING BY NEXT FRIEND—SECURITY FOR COSTS.

*In re Thompson, Stevens* v. *Thompson*, 38 Chy. D. 317, the point of practice decided by the Court of Appeal (Cotton, Fry and Lopes, L.JJ.), affirming North J., was simply this, that where a married woman suing by her next friend obtained judgment without prejudice to an application by the defendant for security for costs on the ground that the next friend was not a person of substance; that an order for security on that ground was rightly granted, since the next friend alone was liable for the costs, and this, notwithstanding, that the married woman, if she had sued alone, would not have been liable to give security; and, it was held that the plaintiff after obtaining judgment by her next friend could not claim the right to sue alone.

PRACTICE—ADMINISTRATION ORDER—DISCRETION OF COURT—DIRECTION BY TESTATOR TO EXECUTORS TO BRING ADMINISTRATION ACTION.

*In re Stocken, Jones* v. *Hawkins*, 38 Chy. D. 319, it was held by the Court of Appeal affirming North, J., that nothwithstanding a direction by a testator to his executors to have his estate administered by the court, the court has still a discretion as to granting such an order, but that some weight ought to be given to such a direction, in considering whether or not the order should be made. Pursuant to such a direction in the will of their testator, one of the executors in the present case, after the lapse of a year from his death, applied for an administration order, which was granted, declaring the estate ought to be administered under the direction of the court, and directing an inquiry of what the estate then consisted; his co-executor, who was also beneficially interested, applied to discharge the order, as being unnecessary and likely to involve the estate in