REVIEW OF CURRENT ENGLISH CASES.

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ADMIRALTY—DAMAGE BY TWO COLLISIONS —SIMULTANEOUS RE-
PAIRS—APPORTIONMENT OF DAMAGES.

The Haversham Grange (1905) P. 307. Action to recover
damages for a collision. The vessel in question had suffered
damages by two separate collisions with different vessels, and in
order to repair the damage thus done, the vessel was put into
dry dock and the damage caused by each collision repaired simul-
taneously. The defendants objected to being charged with any
part of the dock dues because, as they alleged, the damage
caused by the collision for which they were responsible occupied
a shorter time to repair than those caused by the other collision,
and, therefore, the plaintiff had not been put to any extra ex-
pense thereby, but the Court of Appeal (Collins, M.R., and
Romer, L.J.), held, reversing Barnes, P.P.D., that the defendants
were liable for a proportionate part of the dry-docking and inci-
dental expenses.

WILL.—CONSTRUCTION—ABSOLUTE GIFT CUT DOWN TO LIFE ESTATE
BY LATER WORDS—ADMINISTRATION WITH WILL ANNEXED TO
RESIDUARY LEGATEE.

Re Lupton (1905) P. 321 was an application by a person
claiming to be residuary legatee for a grant of administration
with the will annexed and in order to determine the applicant's
right it became necessary for Barnes, P.P.D., to construe the
will of the testator. The will was on a printed form with holo-
graph additions, and it first purported to leave all the testator's
property to the testator's wife "for her own absolute use and
benefit," but in a subsequent clause the testator had added, "and
after her death to come absolutely to (the applicant) to her and
her heirs forever," after payment of two legacies of £20; and it
was held by the learned President that upon a proper construc-
tion of the whole will the concluding clause had the effect of
cutting down the prior absolute gift to the wife to an estate for
her life only, and that the applicant was therefore entitled to the
grant as residuary legatee.