REVIEW OF CURRENT ENGLISH CASES.

ADMINISTRATION—OUTSTANDING GRANT—LETTERS OF ADMINISTRATION MISLAID—RETRACTATION OF RENUNCIATION—FIRST GRANT.

Re Heathcote (1913) P. 42. In this case letters of administration had been granted twenty years ago to the estate of a deceased married woman to her husband's trustee in bankruptcy, the husband having renounced his right. Subsequently the bankruptcy was annulled on payment by the bankrupt of 20s. in the pound, and the trustee in bankruptcy had obtained his release as trustee. Recently a sum of £700 became payable to the legal personal representative of the deceased, and the husband applied for leave to retract his renunciation, for revocation of the outstanding grant, and for a fresh grant to himself. The former grant had been lost and could not be produced. Deane, J., granted the order, and directed that in future all grants to whomsoever made should contain a personal undertaking by the grantee that he will deposit the document with the Principal Registry if and whenever he shall receive a formal notification requiring him to do so. It may be observed that a similar undertaking would seem equally necessary in Ontario, to avoid the obvious inconvenience of having two outstanding grants to different persons. It is also to be noticed that the fresh grant in this case was general in its terms and not merely de bonis non.

MARRIAGE—ENGLISH MARRIAGE—ANNULMENT OF ENGLISH MARRIAGE BY FOREIGN COURT.

Stathatos v. *Stathatos* (1913) P. 46. This case although a divorce case is deserving of careful attention, not so much for the point of law, which is actually decided, as for the state of facts which it discloses, and the perils which it shews are incurred by English people marrying Greeks. In this case the plaintiff though born in France was domiciled in England and in 1904 was married in a registry office to the defendant a Greek and lived with him in England 3 years as his wife. She then went to Greece with the defendant, but when they got there he refused to introduce her to his relatives, or treat her as his wife and finally told her to go back to her relatives