

the duty of burying the deceased, by cremation to deprive him of that right, unless he has left written directions or expressed in his life a wish to be cremated." The result of the application was that leave to bury the urn containing the ashes under the floor of the church was granted.

COPYRIGHT—PICTURES—INFRINGEMENT OF COPYRIGHT—SKETCHES FROM TABLEAUX VIVANTS.

In *Hanfstaengl v. Empire Palace*, (1894) 3 Ch. 109; 7 R. Aug. 80, the Court of Appeal (Lindley, Lopes, and Davey, L.JJ.) has reversed the decision of Chitty, J., in 8 R. May 127, which we referred to vol. 30, p. 585, holding that a drawing of a *tableau vivant* is not necessarily an infringement of the copyright of the picture which the *tableau* is intended to represent. Whether it is so or not is a question of fact depending on the degree of resemblance between it and the copyrighted picture.

MARRIED WOMAN—SEPARATE ESTATE—RESTRAINT AGAINST ANTICIPATION—SEQUESTRATION—JUDGMENT AGAINST MARRIED WOMAN, ENFORCEMENT OF—MARRIED WOMEN'S PROPERTY ACT, 1882 (45 & 46 VICT., c. 75), s. 1—(R.S.O., c. 132, s. 3).

In *re Lumley*, (1894) 3 Ch. 135; 8 R. July 145; 7 R. Sept. 93, an order had been made against a married woman for payment of costs; she was tenant for life of certain real estate for her separate use. A sequestration had been granted to enforce payment of the costs, and the sequestrator applied for an order to compel the agent of the married woman, to whom the rents had been paid, to pay the sequestrator the rents received by him subsequent to the sequestration, to satisfy the costs, and for an injunction and other relief to which it is not necessary to refer. North, J., refused the motion, being of opinion that the restraint against anticipation effectually prevented the income from being reached in execution, both as regards future accruing instalments and instalments in arrear, even though the latter might have accrued after the order had been made and sequestration issued thereon, and this judgment the Court of Appeal (Lindley and Davey, L.JJ.) affirmed, holding the case governed by the previous decision of the other branch of the Court of Appeal in *Hood Barrs v. Cathcart*, (1894) 2 Q.B. 559, noted vol. 30, p. 678. We may observe that a statute has been passed in England (55 & 56 Vict., c. 63) enabling the court to direct costs ordered to be paid by a married woman to be paid out of her separate