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A DECISION of the Chancellor in the case of *Spratt* v. *Wilson*, recently tried before him at the Hamilton sittings, is of great importance to trustees or executors to whom moneys are left by will for investment at their discretion. The Chancellor holds that they are bound to invest in such securities as are sanctioned by the Court. The discretion given them does not warrant an investment (as in the case decided) by deposit of funds in a savings bank at three and a half or four per cent.; so that the failure to invest in securities allowed by law makes them liable, however innocent and honest their conduct may be, to pay the legal rate of interest. They are not released, where infants are interested, by the acquiescence in the investment of the statutory guardian of the infants.

IT appears from the decision in the *Central Press Agency* v. *The American Press Association* that the Consolidated Rules do not provide a remedy for the failure of the officer of a foreign corporation, who is liable to be examined, to comply with an order for his examination for discovery. The action was brought for damages for libel published by the defendants of the plaintiffs. In the usual course an order was made for the examination for discovery of the President of the defendant Association at New York, where the Association has its headquarters, and where the President resides. He did not appear for examination, and the plaintiff then moved to strike out the statement of defence. The Master in Chambers dismissed the motion, on the ground that the Consolidated Rules 499, 520 and 648 do not give any power to strike out the defence of a corporation for default of its officer for examination, and that the remedy is against the defaulting officer personally. As the defendant corporation and its officer in this case were resident out of the jurisdiction, the personal remedy was clearly not available. The Master also held that under Rule 3 all former practice which might be applicable has been superseded. An appeal was taken to Falconbridge, J., who dismissed the appeal on the above grounds and affirmed the decision of the Master in Chambers, following *Badgerow* v. *Grand Trunk Ry. Co.*, 13 P. R., 132. The result is that the plaintiffs have to go down to trial without the advantage of examining the opposite party, an advantage of which they are deprived by defect in the Rules. It is true that the plaintiffs might have enforced the attendance of the officer of the defendant Association by letters rogatory to the foreign Court, a tedious and expensive method of obtaining a remedy which ought to be provided by the Rules.