

trustees were bound to accumulate that interest and add it to the capital or whether they might apply it to the maintenance of the lady during the interval between her marriage and her attaining her majority. Farwell, L.J., held that they might, and that the maintenance clause did not shew a "contrary intention" so as to exclude s. 43 of the Conveyancing Act, 1881.

ADMINISTRATION—CREDITORS' ACTION—REPRESENTATIVES OF DECEASED EXECUTOR—TRUSTEE—DEVASTATION—PAYMENTS TO BENEFICIARIES SIX YEARS BEFORE ACTION—STATUTE OF LIMITATIONS—TRUSTEE ACT, 1888, (51-52 VICT., c. 59) s. 1 (3); s. 8—(10 EDW. 7. c. 34, s. 47 ONT.).

*In re Blow, Governors of Bartholomew's Hospital v. Camden* (1913) 1 Ch. 358. This case serves to deal a somewhat unexpected blow to the rights of trustees to plead the Statute of Limitations. The action was by creditors for the administration of the estate of a deceased person, the defendants being the surviving executor and the representatives of a deceased executor, and the beneficiaries to whom the estate had been distributed; the plaintiffs claiming as lessors. The estate of the deceased had been distributed among the beneficiaries more than six years before action without any provision being made to meet future liabilities under the lease except that the executors took a covenant from the beneficiaries to indemnify them against claims under the lease. The executors pleaded the Statute of Limitations, 51-52 Vict., c. 59 (see 10 Edw. VII., c. 34, s. 47 (Ont.)). Warrington, J., who tried the action, held that the Trustee Limitation Act did not apply (1) because the action was not one to recover money, (2) that if it were, the claim sought to be recovered was not one to which "no existing Statute of Limitation" applied.—With all due deference to the learned judge, it appears to us he has taken too narrow a view of the Act, and that the reasons he has assigned are inconclusive, and for our part we prefer the view expressed by Moulton, L.J., in *Lacons v. Woomall* (1907) 2 K.B. 350, 364, from which the learned judge dissents.

TRADE UNION—EXPULSION OF MEMBER—TRADE UNION ACT, 1871, (34-35 VICT. c. 31) ss. 4, 6, 13—(R.S.C. c. 125, s. 4)—TRADE DISPUTES ACT, 1906 (6 EDW. VII. c. 47) s. 4—PARTIES.

*Parr v. Lancashire & Cheshire Miners' Federation* (1913) 1 Ch. 366. The committee of a trade union passed a resolution to