the interest of the person who made the entry, yet as it would prove the revival of a debt then barred, it was for his interest, and therefore could not be received on behalf of his representatives; and that, even if receivable in evidence, it would not support the plaintiff's case; and as to the payment of interest on the second mortgage, in the absence of proof that the mortgagor authorized or adopted the payments made by the solicitor, they were insufficient to take the case out of the Statute of Limitations. The learned judge concludes his judgment thus:—"Although I think it clear that the mortgage debt has never been paid, yet having regard to the time that has elapsed since any payment or acknowledgment was made, the plaintiff's claim fails and the action must be dismissed with costs." It is certainly somewhat alarming to find that interest may be regularly paid on a mortgage, and notwithstanding that the mortgagee may be barred of recovering the principal, unless he has taken care to preserve evidence that the person paying the interest was duly authorized to do so by the mortgagor.

TRUSTEES—INVESTMENTS—UNCONTROLLED DISCRETION.

The only case remaining to be noticed in the Chancery Division is *In re Brown*, *Brown* v. *Brown*, 29 Chy. D. 889, in which certain trustees (who were also executors) having an uncontrolled power of investment of moneys of an estate, before the commencement of an action to administer the estate, had in exercise of this power invested moneys of the estate in the purchase of bonds of a foreign government, bonds of a colonial railway company, and shares of a bank on which there was a further liability. The chief clerk, in taking the accounts of the testator's estate, disallowed the trustees the moneys applied in the purchase of the bonds and shares. But Pearson, J., although holding that the investments in question ought not to be retained, nevertheless, as the trustees had acted *bona fide* and no loss had resulted to the trust estate, allowed the sums which had been laid out in making the investments.

SELECTIONS.

LAND LAW REFORM.

The letter of Mr. Davey, Q.C., on the subject of the reform of the land law is of great interest and importance. Not only is it the letter of an able lawyer and conveyancer, but of a man who in the natural course of events may be expected to have the opportunity of carrying his ideas into effect. Mr. Davey appears to look forward in the future to a system of registration of titles, and he justly points out that the difficulty of obtaining a land register lies in the transition from the present complicated system of settlements to the simplicity of registered indefeasible titles. It is not clear whether Mr. Davey means the proposals which he makes to take the place of a land register, for which we must wait until matters have simplified themselves, or whether he considers that a land register could now be introduced. A general requirement of compulsory registration would do much injustice, because much land in the country is held on titles which would not bear investigation, although the holders have a good possessory title. On the other hand, too much stress must not be laid on the advantages of what is called the free transfer of land. The worst use to which you can put land is constantly to change its owners. The use of land is in cultivating it, and not in buying and selling it. It is true that the cost of transferring land is excessive when compared with the cost of transferring other property. This is generally attributed to the wickedness of lawyers; but its cause is, first, the complication of the law of real property, which requires time and care to apply to particular titles; and, secondly, the stamp, the cost of which is popularly supposed to go into the yawning pocket of the lawyer, but which, in fact, goes to the Exchequer. Mr. Davey's proposals are not complete, as he looks forward to an ideal as to the present practicability of which he does not give his opinion, but the suggestions which he makes of immediate changes of the law deserve, so far as they go, to be considered one by one. The first suggestion is to abolish primo-