

testator devised estates, in strict settlement, under which an infant was now tenant in tail. The will contained a provision, that when any infant became entitled as tenant in tail, it should be lawful for the trustees to enter into possession of the rents and profits and apply them to keep up the mansion house and manage the property, with power to hold manorial courts, and maintain the infant and apply the surplus in a specified way. Warrington, J., held that the effect of this clause was to vest a legal estate in the trustees anterior to the estate tail, and that this estate would continue during the whole of the limitations of the will, and was consequently void for perpetuity; and he was induced to come to this conclusion because without the legal estate the trustee would have had no power to hold the manorial court; but the Court of Appeal (Cozens-Hardy, M.R., and Moulton, and Farwell, L.JJ.) overruled his decision holding that the provision amounted to a power which could be exercised without having any legal estate, and that the inclusion of a power to hold manorial court, which could not be exercised did not operate so as to change the whole character of the settlement, and therefore that the minority clause was valid.

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## Correspondence

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### MODERN COLLECTION METHODS.

*To the Editor, CANADA LAW JOURNAL:*

SIR,—In this day and age, when the tendency towards systematization along commercial lines is so marked, it is not surprising that from the collection departments of large corporations, and from the numerous agencies, bureaux, bonding companies, clearing houses, etc., who make a specialty of the collection and adjustment of accounts, should be heard the last word in new and up-to-date methods of collection. Two examples of these methods have recently been brought to the attention of the writer, an examination of which will prove decidedly interesting.

The first is in that form of circular letter with which we are all familiar, and the effectiveness of which depends to a large extent upon its close similarity to a personal typewritten communication. It issues forth from the Toronto branch of a certain collection agency, whose head office is located in the United States. The words "Investigation Department" appear in red