

SIGNATURE OF SOLICITOR—SUBSCRIPTION BY CLERK FOR SOLICITOR.

In *France v. Dutton* (1891), 2 Q.B. 208, an attempt was made to extend the principle of *Reg. v. Cowper*, 24 Q.B.D. 60, 533 (see *ante* vol. 26, p. 295), in which it was held that a lithographed signature of a solicitor was an insufficient signature to particulars of a plaint in the County Court in order to entitle the solicitor to the costs of entering the plaint. In the present case, by County Court rules, certain sums may be allowed to a solicitor for preparing particulars of claim and copies thereof, "provided that such particulars and copies are signed by the solicitor." The particulars in question were signed by the solicitor's clerk, who had the management of the matter, and it was held the signature was sufficient. The distinction between the two cases is somewhat fine; in the case of a lithographed signature, it is usually printed before the document is filled up, and may not be a signature to a completed document. It is possible, however, that after the document is completed the clerk may affix the master's signature by a stamp, and we presume that would be within the present case just as much as if he had written the name.

PRACTICE—PRODUCTION OF DOCUMENTS—DOCUMENTS BELONGING TO SOLICITOR—PRIVILEGED COMMUNICATIONS.

In *O'Shea v. Wood* (1891), P. 286, an appeal was brought from the decision of Jeune, J. (1891), P. 237 (*ante* p. 300). The Court of Appeal (Lindley, Bowen, and Kay, L.JJ.) while agreeing with Jeune, J., that the documents belonging to the solicitor could not be ordered to be produced by the plaintiff, yet decided that an affidavit did not sufficiently protect the documents from production by merely stating them "to be privileged, as communications between the deponent and her solicitor," but that it is necessary to show that such letters are professional communications of a confidential character.

ADMINISTRATION—JOINT GRANT TO WIDOW AND TWO ELDER SONS—CONSENT OF MINOR.

In *the goods of Dickinson* (1891), P. 292, a joint grant of administration was made to a widow and her two eldest sons, all parties interested consenting, including a younger son, a minor, who was in his twenty-first year.

In *the goods of Mann* (1891), P. 293, a deceased person left a will limited to her property abroad, which was proved by the executors in the foreign court; but she died intestate as to her property in England. Under these circumstances, a grant of administration was made of the property in England to the sole next of kin.

WILL—CHARITABLE GIFT—LAPSE AFTER DEATH OF TESTATOR—CYPRUS.

In *re Slevin, Slevin v. Hepburn* (1891), 2 Ch. 236, the Court of Appeal (Lindley, Bowen, and Kay, L.JJ.) overruled the decision of Stirling, J., noted *ante* p. 204, and held that the gift to the charity having failed by reason of the institution coming to an end after the death of the testator, the legacy did not fall into the residue, but went to the Crown for analogous charitable purposes.