

Lack of real consent to marriage—Duress or force	4	19
Fraud	8	19
Incapacity to contract marriage—Mental	8	26
Want of age..	1	27
Personal unfitness to contract marriage—		
Impotency	37	18
Pregnancy	15	
Illicit carnal intercourse by wife before marriage	3	
Illegality of marriage—Bigamy	12	25
Consanguinity	4	22

Several States do not recognise annulment on any of the above grounds, while several recognise it on as many as eight. In New York and the District of Columbia, the only recognised ground for divorce is adultery, although both allow annulment of marriages on several other grounds. On the basis of number of grounds for divorce, Kentucky leads with 15; Tennessee, Rhode Island and Washington are next with 12, and Pennsylvania, Georgia and Mississippi next with 11.

(To be continued in June issue)

Review of Current English Cases

(Registered in Accordance with the Copyright Act.)

By CECIL CARRICK, BARRISTER-AT-LAW.

Landlord and tenant—Covenant against sub-letting.

Freeman v. Evans (1922), 1 Ch. 36. (Court of Appeal). A lease contained a provision against the tenant sub-letting without the previous license in writing of the landlords. The tenant gave notice to his sub-tenants terminating their tenancy, and subsequently cancelled it upon the sub-tenants submitting to an increased rent. It was held that the notice to quit and its subsequent withdrawal created, as between the tenant and his sub-tenants, a new tenancy. This constituted a breach of the covenant against underletting in the lease, and the landlords recovered possession of the whole of the premises.