tomb than to have the debtor's mummified father in his sitting-room, the debtor could not inter his children or any of his family in the ancestral vault until the debt was paid. If the debtor died without a settlement, the celebration over him of the accustomed funeral obsequies was denied, and he could not enjoy the rights of burial either in the tomb of his ancestors or in any other place of sepulture, according to Herodotus (II. 136), Diodorus (I. 92, 93), and Wilkinson (*Ancient Egyptians*, vol. ii., p. 51). Have we here the origin of post obits? We understand now why all the old mummies were so carefully kept in the land of the Pharaohs.

The mention of two Hindoo lawbooks above leads us to state that we in Canada cannot be too thankful that our Ontario courts are not in the least troubled with citations from the works of the early Redmen—if, indeed, those polysyllabically-named worthies left any works that could be so used. Think of the burdens under which the practitioners in India labor! We are told that "the Mitakshara, the Smriti Chandrika, the Madhaviya, and the Sarasvati Vilasi are the works of paramount authority in the territories dependent upon the government of Madras." Another writer speaks of the books of Kamalakara, Madhaya, and Narayana, as being frequently consulted and cited there; while a third gives high place to what he calls the embodiment of all law, the Manu-Vijaneswareyum. Thank heaven we need only quote the works of Byles and Smith, Coke and Dart, and people blessed with such like names.

R. V. R.

COMMENTS ON CURRENT ENGLISH DECISIONS.

The Law Reports for May comprise (1891) 1 Q.B., pp. 549-671; (1891) P., pp. 189-257; (1891) 1 Ch., pp. 573-723.

HUSBAND AND WIFE—SEPARATE ESTATE—DEATH OF WIFE—DEVOLUTION TO HUSBAND JURE MARITI—DEBTS OF WIFE.

On p. 235 *ante*, in our note to *Surman* v. *Wharton*, a correspondent has kindly drawn our attention to the fact that there is a mistake. The last sentence should read as follows: "Even where the wife leaves no children, the husband in Ontario is only entitled to one-half of the property as to which she dies intestate, and subject thereto, the other half devolves as if her husband had predeceased her—R.S.O., c. 108, s. 5; consequently in no case in Ontario would the husband appear to be entitled *jure mariti* as in England." We may observe that the collocation of the statutes on this subject in the Revised Statutes is somewhat inconvenient and liable to be misleading.

PRACTICE—LEAVE TO SERVE OUT OF JURISDICTION—OFFICER ON BOARD QUEEN'S SHIP.

Seagrove v. *Parks* (1891), 1 Q.B. 551, may be referred to, not so much on account of the point of practice which it decides, as for the fact of the Court (Cave and Charles, JJ.) recognizing the principle that so long as an officer is on board of one of Her Majesty's ships he is "within the jurisdiction" of the Court, wherever the ship may be. The application was for leave to serve a defendant out of the jurisdiction, the defendant being an officer on board a Queen's ship on the