

the instance of the debenture holders. He gave notice of his appointment to the Crown, and to the tenants. Warrington, J., who tried the action held that the rents in arrear in respect of property not specifically charged belonged to Wilde & Honnibal, and also the drawbacks due from the government, and that the rents due in respect of property specifically charged belonged to the debenture holders, and he held that they could not acquire priority in respect of the drawbacks by first giving notice to the government, because by the terms of the floating charge the company had power to make the assignment of property not specifically charged, and the debenture holders, with notice of the assignment, could not acquire priority by prior notice to the debtor.

ADMINISTRATION ORDER—ORDER FOR SALE—CONVERSION.

In *Fountleroy v. Beebe* (1911) 2 Ch. 257, the short point decided by the Court of Appeal (Cozens-Hardy, M.R., and Buckley, and Kennedy, L.JJ.) is, that where an administration order is made directing the sale of land, that operates as a conversion of the land into personalty from the date of the order.

WILL—CONSTRUCTION—LEGACY TO SERVANTS—"ONE YEAR'S WAGES"—WEEKLY HIRING.

Re Sheffield, Ryde v. Bristol (1911) 2 Ch. 267. In this case a testator had bequeathed to each of his indoor and outdoor servants who had been in his service for five years previous to his death "the amount of one year's wages." Neville, J., held that all servants who fulfilled the condition as to service were entitled to a year's wages, irrespective of whether they were hired at yearly or weekly wages. The Court of Appeal (Cozens-Hardy, M.R., and Buckley, and Kennedy, L.JJ.) affirmed his decision. The distinction drawn between the present case and *Re Ravensworth* (1905) 2 Ch. 1, appears to be rather like a mathematical point.

HUSBAND AND WIFE—MARRIAGE WITH DECEASED WIFE'S SISTER—
DEATH OF HUSBAND BEFORE 1907—DEATH INTESTATE OF SON
OF FIRST MARRIAGE—NEXT OF KIN—SPES SUCCESSIONIS—7
EDW. VII. c. 47, ss. 1, 2.

In *re Green, Green v. Meinall* (1911) 2 Ch. 275 is an illustration of the fact that the English Act permitting marriage with a deceased wife's sister (7 Edw. VII. c. 47) has the effect of