sum to Katie were void for remoteness, because rightly construed it was contended that the gift to the grandchildren was subject to the implied contingency of their attaining thirty years. But Sargant, J., held that there was no such implied contingency but merely a postponement of the period of distribution, and therefore that the gift to the grandchildren was valid; and that the interests of the grandchildren who survived the testator were vested and not contingent on their attaining thirty years, and with this conclusion the Court of Appeal (Lord Cozens-Hardy, M.R., and Pickford, and Neville, L.JJ.) concurred.

TRUSTEE — ADMINISTRATION — ORIGINATING SUMMONS—ACCOUNTS—DEFENCE OF STATUTE OF LIMITATIONS.

In re Williams, Jones v. *Williams* (1916) 2 Ch. 38. In this matter on the return of an originating summons a reference had been directed to take the accounts of a trustee. On the reference the trustee brought in voluminous accounts, and after the vouching of the accounts had proceeded for some time, the defendant for the first time claimed the benefit of the Statute of Limitations Trustee Act 1888 (51-52 Vict. c. 59) s. 8, (R.S.O. c. 75, s. 47). The Master did not decide whether or not the defendants were entitled to the benefit of the defence, but simply certified what would be due if the defence were allowed, and what would be the state of the accounts if the defence were disallowed. On the case coming on for further directions, Neville, J., held that the defence ought to have been set up on the return of the originating summons, and that it was too late to set it up in the Master's office. But see Holmested's Jud. Act, p. 940.

WILL—CONSTRUCTION—GIFT TO TENANT FOR LIFE—REMAINDER TO TESTATOR'S CHILDREN—GIFT OVER IF CHILD SHOULD "DIE WITHOUT LEGAL ISSUE"—PERIOD OF DIVISION.

In re Roberts, Roberts v. *Morgan* (1916) 2 Ch. 42. In this case a will was in question whereby the testator gave his widow an estate for life in his real and personal property and directed that after his death his property should be divided among his four children in manner specified. And he then declared that "if any of my said daughters or sons die without leaving legal issue, his, her, or their share shall be divided between the survivor or survivors of him or her or them so dying without leaving legal issue" as tenants in common. All