

suppose that a blow had been struck at the modern accepted doctrine on the subject of precatory trusts, but a closer examination of the case reveals the fact that the decision in the House of Lords went off on a different ground, viz.: that the attempted gift over was not void as repugnant to the original gift, but was in fact a valid executory devise.

Their lordships do not pretend to question or affect established doctrine with regard to precatory trusts. In fact the Earl of Halsbury, L.C., says in his judgment (p.88): "I do not stop to bring in any rules of law or any canons of construction." The result therefore is that this case does not in any way clash with the uniform series of modern decisions, but on the contrary constitutes a valuable contribution to the law upon the subject under discussion, more especially by reason of the admirable judgments of Kekewich, J., in the Court below and of Vaughan Williams, L.J., and Stirling, L.J., in the Court of Appeal.

The recent case of *In re Oldfield, Oldfield v. Oldfield*, supra, is also a valuable contribution to the subject and is entirely in harmony with the accepted modern doctrine.

LONDON, ONT.

F. P. BETTS.

CHRISTOPHER ROBINSON MEMORIAL.

The following circular has been issued by the committee of the Ontario Bar which has this matter in charge.

"At a meeting called to consider the best means of perpetuating the memory of the late Christopher Robinson, K.C., a committee consisting of the undersigned was appointed to carry out this object. After consideration it was resolved that a fitting commemoration would be a brass tablet with a suitable inscription placed in Osgoode Hall and a scholarship or scholarships founded in connection with the Law Society, to be known as 'The Christopher Robinson Scholarship.' It was further resolved that the subscriptions should be limited to the amount of five dollars each. We confidently rely upon every member of the profession in Ontario remitting without delay a subscription to Angus MacMurchy, 152 Bay Street, Toronto, the treasurer