death of such sister, and subject to any such appointment, in trust for the children of such sister, who, being male, should attain 21, or, being female, should attain that age or marry, in equal shares, and, in default of children who should attain a vested interest, in trust for the next of kin of such sister. One of the sisters predeceased the testator, leaving a husband and three infant children, and the question was whether her children or the next of kin were entitled to the fourth share of the residue given by the will to her. Chitty, J., determined that there had been no lapse, and that the children of the deceased sister were entitled contingently on their attaining 21, or marriage. His decision proceeds on the ground that all that was given to the deceased sister was a life estate, with a power to appoint in favour of her husband, and that her death consequently did not displace the settlement made by the will in favour of her surviving children.

WILL—CONSTRUCTION—GIFT TO WIFE FOR LIFE "FOR HER USE AND BENEFIT, AND FOR THE MAINTENANCE AND EDUCATION OF MY CHILDREN"—ADULT CHILDREN, RIGHT OF, TO MAINTENANCE.

In re Booth, Booth v. *Booth*, (1894) 2 Ch. 282; 8 R. June, 125, a testator had given the residue of his estate in trust to pay the income to his wife for life, "for her use and benefit, and for the maintenance and education of my children," and after her decease to divide the residue equally between his children. The widow having become bankrupt, North, J., held that the widow was entitled to the income, subject to a trust for the maintenance of the children, and that the trust was not limited to children under 21 or unmarried, and he directed an enquiry whether any, and, if any, which, of the adult children of the testator required maintenance, notwithstanding that the trustee in bankruptcy of the widow claimed the whole income.

SOLICITOR AND CLIENT—COSTS—ORDER FOR TAXATION OBTAINED BY CLIENT—RETAINER, RIGHT TO DISPUTE.

In re Frape, (1894) 2 Ch. 290; 8 R. June, 142, a client obtained a special order to tax his solicitor's bills of costs, "ten in number"; the order contained no reservation of right to dispute the retainer of the solicitor. As to one of the bills the client disputed the retainer *in toto*. The taxing master ruled that he was not entitled to do this, but could only dispute the retainer as to