

RENT—USE OF WAY—REVERSIONER—PERSONAL REPRESENTATIVE.

In *Hastings v. North-Eastern Ry.* (1899) 1 Ch. 656 the Court of Appeal (Lindley, M.R. and Rigby and Williams, L.JJ.) affirms the judgment of Byrne, J. (1898) 2 Ch. 674, noted *ante* p. 182, holding that the reversioner and not the personal representative of the lessor was entitled to the rent reserved in a lease of a right of way.

MARRIED WOMAN—GENERAL POWER OF APPOINTMENT—EXERCISE OF GENERAL POWER—LIABILITY OF APPOINTED LAND TO DEBTS—MARRIED WOMEN'S PROPERTY ACT 1882 (45 & 46 VICT. C. 75), s. 4—(R.S.O. C. 163, s. 8.)

In *re Hodgson, Darley v. Hodgson* (1899) 1 Ch. 666. A married woman having a general power of appointment over a fund, by her will appointed £1100 of it to one Darley "in satisfaction of a debt, and that amount due from one to her." As a matter of fact there was no debt due by the testatrix to Darley, but a debt of £1100 was due from her husband to Darley—and the evidence satisfied the Court that it was this debt which was referred to in the appointment. After the death of the testatrix her husband paid the debt to Darley, but it appeared that there were debts due by the testatrix, and that, including the £1100, her estate was insolvent. The question was whether there had been such an exercise of the power of appointment as to make the fund appointed liable for the testatrix's debts generally under the Married Women's Property Act 1882 (45 & 46 Vict. c. 75) s. 4.—(R. S. O. c. 163, s. 8). It was contended that the appointment failed first because the debt to Darley was not owing by the testatrix, and secondly because it had been paid by the husband who really owed it, but North, J. was of opinion that the appointment was valid at the time of the testatrix's death, and though by reason of her claim being paid, Darley might not now be beneficially entitled to the fund, yet, the appointment having been validly made, the fund became liable under the statute for the payment of the testatrix's debts generally.

PRACTICE—ATTACHMENT—ENFORCING ORDER AGAINST CORPORATION—DIRECTORS LIABILITY OF, TO ATTACHMENT—SERVICE OF ORDER—RULE 609.

In *McKeown v. Joint Stock Institute* (1899) 1 Ch. 671 the plaintiff sought to enforce an order against the defendant company requiring it to deliver accounts. He therefore moved for an attachment against the sole director, and the secretary of the defendant company. The order in question had been personally served on