

gift is not to be cut down to a trust estate, by the mere expression of a wish that the donee shall leave the property to some charitable purpose.

INSURANCE, MARINE—DEVIATION CLAUSE—AGREEMENT THAT VESSEL SHALL BE INSURED AT A PREMIUM TO BE ARRANGED—SUBJECT TO "DUE NOTICE" OF DEVIATION—NOTICE OF DEVIATION GIVEN AFTER LOSS.

*Mentz v. Maritime Ins. Co.* (1910) 1 K.B. 132. This was an action on a policy of marine insurance which contained a clause providing that in the event of the vessel making any deviation such deviation shall be held covered at a premium to be arranged "provided due notice be given by the assured on receipt of advice of such deviation." The vessel made two deviations and in the course of the second deviation was stranded in February, 1908, and became a total loss. The plaintiff had no notice of either deviation until April, 1908, when they were informed of the second deviation and at once gave notice of it to the defendants. They were not informed of the first deviation until May, 1908, and not thinking a notice of it to be of any importance in the circumstances they did not give any notice of it to the defendants till many months later. The question, therefore, was whether a notice given after loss was a sufficient compliance with the condition. The defendants contended it was not "due notice" because it was impossible for them when it was given to protect themselves by reinsurance. But Hamilton, J., declined to give effect to that argument, and on the contrary held that the notice given was a sufficient compliance with the condition.

CRIMINAL LAW—FALSE PRETENCES—EVIDENCE OF OTHER FRAUDS—ADMISSIBILITY.

*The King v. Fisher* (1910) 1 K.B. 149. In this case the defendant was indicted for obtaining a pony and cart under false pretences on June 4, 1909. Evidence was admitted that on May 14, 1909, and on July 3, 1909, the prisoner had obtained provender from other persons by false pretences, different from those alleged in the indictment. The prisoner was convicted, but on a case stated by the justices, it was held by the Court of Criminal Appeal (Lord Alverstone, C.J., and Channell and Coleridge, J.J.), that such evidence ought not to have been received. Channell, J., who delivered the judgment of the court, admits that the question how far evidence is admissible of other criminal acts on the