COMPANY—ANTI-CHRISTIAN OBJECTS—CAPACITY TO RECEIVE GIFTS—BEQUEST TO ANTI-CHRISTIAN COMPANY—VALIDITY OF BEQUEST—BLASPHEMY ACT 1697 (9-10 WM. III., c. 32) (9 WM. III., c. 35 Rev. Stats.).)

Bowman v. *Secular Society* (1917) A.C. 406. This was an appeal from the Court of Appeal (1915) 2 Ch. 447 (noted ante vol. 52, p. 67). The question at issue being whether a bequest to a society incorporated "to promote the principle that human conduct should be based upon natural knowledge, and not upon supernatural belief, and that human welfare in this world is the proper end all thought and action." It was contended that the Society was anti-Christian in its objects and the bequest, therefore, illegal; but the House of Lords (Lord Finlay, L.C., and Lords Dunedin, Parker, Sumner, and Buckmaster) have affirmed the judgment of the Court of Appeal upholding the validity of the bequest, the Lord Chancellor dissenting. This case looks very like an instance of judicial legislation. In arriving at their conclusion the majority of their Lordships are no doubt influenced by the so-called "liberal" tendencies of the age, and the general trend of legislation in favour of more tolerant views than formerly prevailed in regard to religious questions. Jewish Judges may now sit on the Bench of Justice, and if the constitution is so changed as to authorize such a departure from former practice, it is difficult to see how the former legal antagonism to all anti-Christian opinions, can well be maintained with any regard to consistency. The Lord Chancellor takes the view, however, that such changes in the law should be accomplished by legislation and not by judicial decisions.

CONTRACT—CONDITION—SUSPENSION OF DELIVERY—PREVENTING OR HINDERING DELIVERY—WAR—SHORTAGE OF SUPPLY—RISE IN PRICE.

Tennants v. *Wilson* (1917) A.C. 495. This was an appeal from the decision of the Court of Appeal (1917) 1 K.B. 208 (noted ante p. 140) The contract for the sale of goods in question in the action was subject to a condition that it should be suspended pending any contingencies beyond the control of the sellers (such as war) causing a short supply of labour, fuel, raw material, or manufactured produce, preventing or hindering the delivery of the goods in question. The greater part of the goods in question available for the British market came from Germany, which supply was stopped by the war, and caused a substantial shortage of the goods, and a consequent rise in price; and the question