objecting that the compromise was one which ought not to be accepted, which he held had not been done.

COMPANY—WINDING-UP—ASSETS COVERED BY DEBENTURES—UNSECURED CREDITOR—(R.S.C. c. 129, s. 8).

*Re Crigglestone Coal Co.* (1906) 2 Ch. 327 was an application by an unsecured creditor of an insolvent joint stock company for a winding-up order. The application was opposed by debenture holders whose debentures covered all the assets of the company, and who had obtained the appointment of a receiver to enforce their security, and also by the company which was under the control of the debenture holders, on the ground that there were no assets available for unsecured creditors. Buckley, J., granted the order and the Court of Appeal (Collins, M.R., and Romer, and Cozens-Hardy, L.JJ.), affirmed his decision on the ground that those who opposed the application had failed to shew that no possible benefit could accrue to the unsecured creditor by granting the order.

ADMINISTRATION—STATUTE OF LIMITATIONS—"PRESENT RIGHT TO RECEIVE THE SAME"—RIGHT OF ACTION AT LAW—INCAPACITY TO SUE CO-EXECUTOR AT LAW—EQUITABLE RIGHT OF ACTION—LAW OF PROPERTY AMENDMENT ACT, 1860 (23 & 24 VICT. 38), s. 13—(R.N.O. c. 72, s. 9).

*In re Pardoe McLaughlin* v. *Penny* (1906) 2 Ch. 340 the Court of Appeal have reversed the judgment of Kekewich, J. (1906), 1 Ch. 265 (noted, ante, p. 337).

WILL—CONSTRUCTION—GIFT TO CHILDREN AS A CLASS—SUBSTITUTIONAL GIFT TO ISSUE—"SHALL PREDECEASE ME"—ISSUE OF PARENT DEAD AT DATE OF WILL.

*In re Gorringe, Gorringe* v. *Gorringe* (1906) 2 Ch. 341. The Court of Appeal (Williams, Romer and Moulton, L.JJ.), have reversed the decision of Joyce, J. (1906) 1 Ch. 319 (noted, ante, p. 338), and hold that the issue of the son who was dead at the date of the will were entitled to participate in the residuary gift in favour of the issue of the testator's children "who shall predecease me." The Court, however, was not unanimous, Romer, L.J., dissenting.