pany in manner therein mentioned. It was doubtful whether the proposed division was not illegal as interfering with the rights of the shareholders under the memorandum and articles of association of the defendant company. A meeting was called of the shareholders of the defendant company. At this meeting an amendment was proposed by the plaintiff and ruled out of order by the Chairman. After a discussion of the motion to confirm the resolution, a majority of the shareholders voted in favour of terminating the discussion, and the motion for confirmation of the proposed sale was then put and carried by a majority of the shareholders present or represented. On the motion for an interim injunction, counsel for the defendant company undertook that the proposed division of the shares of the Debenture Co. should not be made until after the trial of the action otherwise than in accordance with the articles and memorandum of association. Stirling, J., thereupon refused to grant an injunction, being of opinion that the proposed transaction was valid, and not invalidated, on the ground that the directors of the defendant company were also largely interested in the Debenture Co.; and that the proceedings at the shareholders' meeting were regular. On appeal the decision of Stirling was affirmed, the Court of Appeal (Lindley, M.R., and Chitty and Collins, L.JJ.) being of opinion that the transaction was within clause (*i*) above referred to, and also within clause (*o*), providing for amalgamation with another company. As regards the proceedings at the meeting of shareholders, the Court of Appeal found no reason to question their validity, and held that, though it would be irregular for the majority at such a meeting to prevent all discussion by the minority, yet, when a reasonable opportunity has been given for the views of the minority to be stated by some of them, it is competent for the majority to vote that the discussion be closed, and a vote taken on the motion before the chair; and it is not necessary that every member of the minority who wishes to speak should be heard.

STATUTE OF LIMITATION.—MONEY CHARGED ON LAND—ACKNOWLEDGMENT—PART PAYMENT—DEVISEE OF LAND CHARGED, ALSO TENANT FOR LIFE OF INCOME OF OTHER LAND CHARGED—REAL PROPERTY LIMITATION ACT, 1874 (37 & 38 VICT., C. 57), S. 8—(R.S.O., C. 133, S. 23).

In re Allen Bassett v. *Allen* (1898) 2 Ch. 499, is a case which turns on the Real Property Limitation Act, 1874, s. 8 (see R.S.O.,