

Robinson, having been associated with him on behalf of England and Canada in the Behring Sea Arbitration.

We conclude with another quotation from the *Times*—"With one voice the Bench and Bar of England to-day will say of the late Chief Justice he had noble instincts; he maintained the traditions of English justice, and loved the best in public and private life."

ENGLISH CASES.

EDITORIAL REVIEW OF CURRENT ENGLISH DECISIONS.

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PROBATE—ADMINISTRATION WITH WILL ANNEXED—NEXT OF KIN OUT OF JURISDICTION—ASSETS, AND SOME BENEFICIARIES, WITHIN JURISDICTION—GRANT TO STRANGER WITHOUT CITING NEXT OF KIN.

In The Goods of Moffatt (1900) P. 152. In this case application was made for the grant of administration with the will annexed without citing the next of kin, who were resident abroad. The will was made by the testatrix, domiciled in Hayti. There was no appointment of executors, but the will contained the words, "M. E. Bordu, of Port-au-Prince, and Mr. J. B. Wallace, of Liverpool, will carry out my last wishes." The only estate in England consisted of the sum of £1260 7s. 11d. in the hands of Mr. Wallace's firm. The sole next of kin, who was entitled to one-half of this fund, lived in Hayti, and had not been cited. The beneficiaries of the other half were in England and assented to Mr. Wallace being appointed administrator with the will annexed. Jeune, P., granted the application, as best carrying out the terms of the will.

ADMINISTRATION DE BONIS NON—REVOCATION OF GRANT ON DISAPPEARANCE OF ADMINISTRATOR—FRESH GRANT.

In The Goods of Loveday (1900) P. 154, a grant of administration had been made to the widow of a deceased intestate in 1885. She had since disappeared and could not be found upon due inquiry, and an application was now made by one of the next of kin to revoke the former grant, and to make a new grant de bonis non to the applicant. Jeune, P., granted the application, though admitting he was going a little beyond any decided case in doing so.