

SETTLEMENT—FORFEITURE CLAUSE ON BANKRUPTCY, ALIENATION, OR DEATH—
INTERIM INCOME—ACCELERATION.

In re Akeroyd, Roberts v. Akeroyd, (1893) 3 Ch. 363, turns upon the construction of a marriage settlement whereby certain property of a wife was settled upon trust to pay the income to the wife for life, and after her death to her husband until he should become bankrupt or alienate the same, or until his death, whichever should first happen; and after the decease of the survivor, then upon trust for the children of the marriage. The husband became bankrupt in the lifetime of his wife. She having died, and her husband having survived her, the question was who was entitled to the income which should accrue between the death of the wife and the death of the husband. It was claimed by the children; and by the husband's trustee in bankruptcy under the authority of *Re Tredwell*, (1891) 2 Ch. 640; but the Court of Appeal (Lindley, Lopes, and Smith, L.J.J.) held that the children were entitled to it. North, J., had decided that the income for this period had not been disposed of by the settlement, and was therefore applicable as if no settlement had been made. The Court of Appeal distinguished the case from *Re Tredwell* on the ground that in that case the intention of the settlor could not be collected from the settlement, whereas in the present case they held that it could.

Reviews and Notices of Books.

Admiralty Law, Canada. The Rules, 1893, annotated, with forms, tables of fees, and statutes, and a treatise on the matters subject to the jurisdiction of Admiralty Courts in Canada. By Alfred Howell, Barrister-at-Law, author of "Naturalization in Canada," "Surrogate Court Practice," and other works. Toronto: The Carswell Co. (Ltd.), Law Publishers, etc., 1893.

As the author says in his preface, the coming into force of the Admiralty Act, 1891 (Canada), conferring jurisdiction throughout Canada and its waters, tidal and non-tidal, and of the General Rules for regulating the practice thereunder, published in the *Canada Gazette*, June 10th, 1893, mark a new era in the administration of maritime law and the exercise of admiralty jurisdic-