REVIEW OF CURRENT ENGLISH CASES.

PROBATE—ADMINISTRATION—"SPECIAL CIRCUMSTANCES"—PROBATE ACT, 1857 (20-21 VICT. C. 77), S. 73—(10 EDW. VII. C. 31, S. 54(2) (ONT.))—HUSBAND AND WIFE—MURDER OF WIFE BY HUSBAND—HUSBAND'S EXECUTOR APPLYING FOR ADMINISTRATION OF WIFE'S ESTATE—GRANT TO NEXT OF KIN OF WIFE—EVIDENCE.

Re Crippen (1911) P. 108. This was an application by one of the next of kin of the murdered wife of the notorious Dr. Crippen for administration to her estate. The application was opposed by Ethel Le Neve, whom the doctor had appointed his sole legatee and executrix. It was contended on her behalf that the conviction of the deceased doctor of the murder of his wife was res inter alios acta and not admissible evidence of the commission of the crime in the present proceeding, and that by his death he had expiated his crime, and that his personal representative was entitled to the grant, but Evans, P.P.D., rejected this claim, and made the grant as asked on the ground that the facts presented "special circumstances" within the meaning of the Probate Act, 1857, s. 73 (10 Edw. VII. c. 31, s. 54(2) (Ont.)), justifying his passing over the husband's representative, and he comes to the conclusion that the alterations in the laws of evidence have practically destroyed the basis on which some of the elder cases rested, in which it was held that a record of a conviction was inadmissible evidence of the commission of the crime, in other proceedings in which the fact had to be proved.

SOLICITOR—AGREEMENT FOR SERVICE—RESTRICTIVE UNDERTAKING—CARRYING ON BUSINESS OF A SOLICITOR—CONSTRUCTION—LETTER WRITTEN OUTSIDE TO PERSON WITHIN PROHIBITED AREA—INJUNCTION.

Woodbridge v. *Bellamy* (1911) 1 Ch. 326 was an action by solicitors against a solicitor to enforce an undertaking not to carry on the business of a solicitor within a specified area. The breach complained of was the writing of a letter by the defendant in his character of a solicitor from London, where he carried on business to a person resident within the prescribed area demanding payment of a debt on behalf of a client residing also within