

pretation of the words used in it, an expression of the intention of the testator to use the term "children" not merely according to its *prima facie* meaning of legitimate children, but according to a meaning which will apply to and include illegitimate children." The decision of Eve, J., was therefor reversed.

COMPANY — PRIVATE COMPANY — SALE TO COMPANY — SALE
APPROVED BY ALL THE SHAREHOLDERS—ISSUE OF DEBENTURES
—DIRECTORS NOT ENTITLED UNDER ARTICLES TO VOTE—
POWER TO WAIVE TECHNICALITIES—VALIDITY.

In re Express Engineering Works (1920), 1 Ch. 466. In this case the question was whether certain debentures issued by a company in payment for certain property sold to the company were valid. The company was a private company composed of five persons. The articles provided that no director should vote on any question in which he was personally interested. The five members met together at what was described in the minutes as a board meeting, and agreed to sell to the company for £15,000 of debentures of the company property which they had a few days before acquired for £7,000. This sale they agreed to on behalf of the company, and at a subsequent meeting of the five the seal of the company was affixed to the debentures. The company having gone into liquidation, the liquidator contended that the debentures were invalid and were not binding on the company. There was no suggestion of fraud and Astbury, J., held that the transaction was one within the powers of the members of the company, and although the meeting was styled a directors meeting, yet as all of the five shareholders were present, it was in substance and effect a general meeting, and having received the unanimous assent of all the shareholders the debentures were valid: and the Court of Appeal (Lord Sterndale, M.R., and Warrington and Younger, L.JJ.), affirmed his decision.

ALIEN—NATURAL BORN GERMAN SUBJECT—NATURALIZATION IN
AUSTRALIA—OATH OF ALLEGIANCE—STATUS IN UNITED KING-
DOM—NATURALIZATION ACT, 1870 (33-34 VICT. C. 14) ss. 7, 10
—AUSTRALIAN CONSTITUTION ACT, 1900 (63-64 VICT. C. 12)
SCHD. ART. 51 (XIX.)—AUSTRALIAN NATURALIZATION ACT
1903 (No. 11 of 1903) ss. 5, 7, 8—BRITISH NATIONALITY AND
STATUS OF ALIENS ACT, 1914 (4-5 GEO. V., C. 17) s. 27(1).—
(4-5 GEO. V. C. 44, s. 8 (D.))

Markwald v. Attorney-General (1920) 1 Ch. 348. This case reveals the somewhat curious condition of affairs that a man may be a British subject and entitled to the rights and privileges of a