

which had accrued after the recovery of the judgment could not be reached. The judgment of Kay, L.J., contains a useful review of the cases on this branch of the law.

MARRIED WOMAN—CONTRACT MADE BEFORE MARRIAGE—PERSONAL LIABILITY OF MARRIED WOMAN.

Robinson v. Lynes, (1894) 2 Q.B. 577, is another decision on the law relating to married women. In this case the action was brought against a married woman on a contract made by her before marriage. The writ was specially indorsed, and the plaintiff applied for a speedy judgment notwithstanding appearance. The only defence set up was that she had married since the date of the contract. The Divisional Court (Wills and Williams, JJ.) were of opinion that the Act of 1882 had not altered the law as to contracts made before marriage, and that notwithstanding the marriage the defendant remained personally liable for the debt, and the plaintiff was entitled to judgment against her personally in the ordinary form without any limitation of execution to her separate estate as in *Scott v. Morley*, 20 Q.B.D. 120.

WATERWORKS—NEGLIGENCE—STOP COCK IN SERVICE PIPE—OBSTRUCTION ON PAVEMENT OF STREET.

In *Chapman v. Fylde Waterworks Company*, (1894) 2 Q.B. 599; 9 R. Sept. 236, the plaintiff sued for damages for injuries sustained by reason of his having tripped over the cover of the guard box protecting a stop cock in a water service pipe between the main and the premises of a consumer. The box had been put down by the defendants at the request and expense of the consumer, and the lid or cover had got out of order and could not be repaired without breaking up the pavement, which the defendants alone were authorized to do. The Court of Appeal (Lord Esher, M.R., and Kay and Smith, L.JJ.), without deciding whether the apparatus was the property of the defendants or the consumer at whose request it had been put down, nevertheless held that the defendants were guilty of negligence in not keeping it in repair, and liable to the plaintiff.

LIMITATIONS, STATUTE OF—AGREEMENT FOR LEASE, POSSESSION UNDER—EQUITABLE RIGHT TO POSSESSION—REAL PROPERTY LIMITATION ACT, 1833 (3 & 4 W. 4, c. 27), ss. 2, 7—REAL PROPERTY LIMITATION ACT, 1874 (37 & 38 VICT., c. 57), ss. 1, 9—(R.S.O., c. 111, ss. 4, 5, s-ss. 7, 8).

Warren v. Murray, (1894) 2 Q.B. 648, is a decision of the Court of Appeal (Lord Esher, M.R., and Kay and Smith, L.JJ.),