formed by the court in general term, The Supreme Court Justices divided, reversing the decision below. The dis- order held to the old rule and declared that a will for the testator, no question of ambiguity. There is a decision as an illustration of the which he had pointed out the reasons, serve to show the state of the testa- est lawyers, doubtless, who will adhering Justices in Patch v. White, were age that these four members of the court, their duty to abide by a line of previous no line that a deeper study into principles of interpretation will probably y of thinking to the support of the later the Supreme Court of the United States.

FRANK WARREN HACKETT.

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NOTES.

"Admissions of Parties "Identified in Interest."—If it be difficult to reach a rational explanation for the introduction of a party's own admissions, it is still more perplexing to understand why he should be prejudiced those of another. That both parties have the same reasons for speaking the truth is a generalization questionable even as a working hypothesis. Moreover, the carelessness of the utterances or the existence of ulterior motives is peculiarly difficult of proof. Yet the broad assertion is often made that, where parties are identified in interest, the admissions of one are receivable against the other. Under this statement are indubitably included admissions of parties in privity, of parties in joint interest, and of parties legally identified in person. The doctrine that the admissions of a predecessor in title are receivable, did not, however, intimate in any conception of "identity of interest." In the early cases, it is treated as an exception to the Hearsay Rule, and the death of the