

the only suggestion that in Lear, as in many old men, there may have been uncontrolled lust. "One gross crime to another" might easily bear this interpretation. The foolish old man divided his property in the degenerately generous way, only to regret it; when he finds his personal importance lessened, he loses rapidly more self-control with each fresh buffet of misfortune, and passes away naturally enough.

In the play we have also the natural fool and the pretended lunatic, and we think all the parts were well taken, and the characters sustained, but as we really only intended to refer to Irving we must refrain from further comments.

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*Roe v. Nix.*

The facts of this remarkable and extremely narrow case, which was tried by Mr. Justice Gorell Barnes and a special jury, at the close of last year, are too fresh in the minds of our readers to require or to justify recapitulation at any length, and it may suffice to state that the point at issue was whether certain testamentary documents executed by a Chancery lunatic, Miss Ellen Roe, were or were not vitiated by the alleged mental unsoundness of the testatrix. The evidence was very evenly balanced. On the one hand, Miss Ellen Roe had been found lunatic by inquisition; no super-sedeas had been obtained. The Lord Chancellor's visitors were of opinion that she did not possess testamentary capacity at the critical period; the deceased lady had proposed to bequeath her property to the Dean of Norwich, and to leave legacies to the Archbishop of Canterbury and the Lord Chancellor, and a strong effort was made to show that she was under the influence of an insane aversion towards her sisters, and that the case, therefore, came within the *ratio decidendi* of *Dew v. Clark* and similar authorities. On the other hand, it was contended, and evidence was adduced to prove, that the only form of insanity from which Miss Roe had ever suffered was temporary alcoholism, and that her aversion to her sisters was at first merely the indifference caused by long absence from home, and afterwards the dislike which the inmate of an asylum is apt to feel to the persons whom she supposes to have put her there. It was also proved that one of the Chancery Visitors had expressed an opinion that Miss Roe

might be allowed to make a will—although, of course, without undertaking to say that it would be valid—and that the actual preparation and execution of the disputed instrument were preceded and accompanied by every possible precaution on the part of testatrix's solicitor. In the event the jury pronounced in favour of Miss Roe's testamentary capacity—a conclusion at which we might not perhaps have been able to arrive—but which it was perfectly possible for reasonable men to adopt under the circumstances, and the verdict was received in Court with the popular applause which the judicial obliteration of the stigma of insanity never fails to elicit. The course of this case was seriously impeded by the fact that all the reports of the Chancery Visitors with regard to Miss Roe were presumably destroyed at her death, and, at any rate, were not forthcoming for the purposes of the trial. We trust that Section 186 of the Lunacy Act, 1890, which renders this absurdity possible and lawful, will receive the early attention of the Legislature.

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*Morley v. Loughnan.*

The case of *Morley v. Loughnan* is equally interesting to the student of human nature, the lawyer, and the psychologist. The details of the strange and painful story on which it turned are, no doubt, familiar to our readers, but a sketch of the salient features may not be inopportune. The late Mr. Henry Morley, from whom the defendant, Mr. W. H. Loughnan, a prominent member of the Close Sect of Plymouth Brethren, was alleged to have obtained sums of money, amounting to about £140,000, by undue influence, was an epileptic, possessed the exaggerated warmth of sentiment, the liability to alternate depression and elation, and the need for external guidance, which epileptics frequently display, and though not positively insane, passed at least the greater portion of his life on the borderland between the world of sane men and the realm of minds diseased. Conscious of the risks to which his son's mental condition exposed his substantial fortune, Mr. Morley's father had placed him under the friendly control of "companions;" and, when the narrative opens, this desirable appointment had just fallen to the lot of Mr. W. H. Loughnan. In the creed of the Close Sect of Plymouth