

The Acts of Assembly which authorize the sale of real estates of infants considered as to their true construction, their practical utility, and their constitutionality.

Where the widow herself is the petitioner her separate assent to a sale is not required.

The credit given on the sale of an infant's real estate considered as an investment for his benefit.

A bid may be reserved, or a bye-bidder allowed in certain cases. (a)

An estate ordered to be sold is under the protection of the Court, and may be rented until a sale can be effected.

The various cases in which it may become necessary to put a present value upon a life interest in property.

The formation of tables shewing the expectation of human life at every age. In ascertaining the present value of a life interest, and in apportioning a burthen between the tenant for life, and the remainderman or reversioner, the estimate must be made from a consideration of all circumstances, in which assistance may be derived from tables shewing the expectation of life. (b)

(a) But see *Moncrieff v. Goldsborough*, 4 H. & McH. 281; *Peck v. List*, 23 W. Va. 338; *Bank v. Sprague*, 20 N. J. Eq. 159; *Yerkes v. Wilson*, 81 Pa. St. 9; *Mortimer v. Bell*, L. R. 1 Ch. 10; *Heatley v. Newton*, 19 Ch. D. 326. In *Peck v. List*, it was held that if the owner of goods, which are put up for sale at auction by his direction, employ a puffer to bid for him, it is a fraud on the real bidders, and the highest bidder cannot be compelled to complete his contract. In an article on *Auctions and Auctioneers*, 8 Southern Law Rev. 584, there is said to be considerable conflict among the authorities as to the extent to which the rule against puffers is to be carried. If the vendor notifies bidders of his intention to employ by-bidders it does not vitiate the sale. Many cases hold that the vendor may employ a bidder if he does it *bona fide* to prevent a sacrifice of the property under a given price.

(b) The most usual cases in which it becomes necessary to determine the present value of life estates are dower and curtesy. In the case of dower it is provided by Rev. Code, Article 47, section 63, that where a widow consents to the sale of an intestate's real estate by commissioners in proceedings for partition, the Court shall award to such widow in lieu of her dower such proportion of the proceeds of sale as shall be just and equitable, not exceeding one-seventh nor less than one-tenth part of the net amount of sales according to the age, health and condition of such widow.

The following rule has been adopted by the Circuit Court of Baltimore City to determine the allowance out of the proceeds of sale of land to a widow in lieu of her dower.

If the widow is under 40 years of age, not more than one-seventh.

If above 40, and under 45, not more than 2-15.

" " 45, " 51, " " 1-8.

" " 51, " 56, " " 1-9.

" " 56, not less than 1-10 of the net proceeds of sale.

Where repairs or improvements are to be made on real estates in which a widow has dower the Orphans' Court may adjudge, determine and apportion in their discretion what part of the expenses shall be borne by the widow. Rev. Code, Art. 50, sec. 223.

The statutory rule in the case of curtesy, is that in case of the sale of a married woman's real estate by Commissioners, the Court shall award to