

notice? (See section 2.) *Green v. Early*, 39 Md. 229. See also, *Milbolland v. Tiffany*, 64 Md. 457.

A transfer from husband to wife, held void notwithstanding an attempt to set up a secret parol trust. *Plummer v. Jarman*, 44 Md. 638.

A deed executed for a simulated consideration to a son, who immediately conveys without consideration to the wife, is void. *Norberg v. Records*, 84 Md. 570.

Prior to the code of 1860, the wife's money, goods and chattels, vested absolutely in the husband, and so as to money paid a married woman during coverture unless it was expressed to her sole and separate use. Hence, a promise by the husband to return money so vested in him is not binding and can not support a subsequent conveyance by the husband to the wife in derogation of the rights of creditors. The deed is good, however, as between the husband and wife. How the husband might settle money upon his wife. *Bayne v. State*, use of Edelen, 62 Md. 104. See also, *Farmers' Bank v. Jenkins*, 65 Md. 248; *Hinkle v. Wilson*, 53 Md. 292; *Sabel v. Slingluff*, 52 Md. 132; *Oswald v. Hoover*, 43 Md. 368.

A transfer from the husband to the wife held to be a fraud as against creditors, and that the wife was not *bona fide* engaged in business, so as to be protected by section 7 of the code of 1888. *Manning v. Carruthers*, 83 Md. 7.

Quære, as to whether a transfer of certain notes to the wife was not void under this section. Case remanded that this question might be determined. *Luckemeyer v. Seltz*, 61 Md. 325.

Wife's property protected from husband's debts.

Where property held by husband and wife as tenants by the entirety is mortgaged by the husband, the purchaser of the husband's interests is not entitled to possession as against the wife. Such property cannot be subjected to the husband's debts. *McCubbin v. Stanford*, 85 Md. 390.

A claim for damages for personal injuries is not "property." The words "in any other manner," construed. *Samarjevovsky v. Baltimore, etc., Ry. Co.*, 88 Md. 480. (See section 5.)

Where a suit is against a husband and wife jointly for the wife's tort, article 45, section 1 of the code of 1860 (relative to the wife's property not being liable for the husband's debts), did not prevent the wife's separate estate from being levied on. *Brown v. Kemper*, 27 Md. 673.

For a case involving a merger as affected by the spirit and intent of the act of 1853, ch. 245, sections 1 and 2 (protecting the wife's property from the husband's debts), see *Clark v. Tennison*, 33 Md. 90.

For cases involving the effect of the acts of 1841, ch. 161, 1842, ch. 293, and 1853, ch. 245, in connection with the constitutional provision to the effect that the legislature should pass laws protecting the wife's property from the husband's debts, see *Clark v. Wootton*, 63 Md. 116; *Schindel v. Schindel*, 12 Md. 313.

For cases involving the act of 1842, ch. 293, section 1 (enabling married women to become seized of property), see also, *Mutual Ins. Co. v. Deale*, 18 Md. 47; *Bridges v. McKenna*, 14 Md. 266; *Logan v. McGill*, 8 Md. 469.

The wife's real estate acquired before 1853, is exempted during her life from execution for the husband's debts. The same rule holds when the real estate is converted, save as affected by the husband's curtesy. Article 45, section 1 of the code of 1860, was intended mainly as a revision or embodiment of pre-existing statutes. *Rice v. Hoffman*, 35 Md. 350. And see *Smith v. McAtee*, 27 Md. 436; *Taggart v. Boldin*, 10 Md. 116; *Logan v. McGill*, 8 Md. 469.

At common law, the wife's personal property acquired during coverture, including *choses in action*, vested in the husband and was liable for his debts. If notes and bonds were not reduced into possession by the husband during coverture, they passed to the wife's administrator under the act of 1798, ch. 101. *Crane v. Gough*, 4 Md. 328; *Peacock v. Pembroke*, 4 Md. 282. See also, *Hubbard v. Barcus*, 38 Md. 180; *State v. Krebs*, 6 H. & J. 31; *Wylie v. Basil*, 4 Md. Ch. 329.

For cases arising under article 45, sections 1 and 2 of the code of 1860, relative to the protection of the wife's separate property from the husband's debts, see *Clark v. Wootton*, 63 Md. 117; *Armstrong v. Kerns*, 61 Md. 366;