Clarifying Section 2B of the Wills Act

1 Introduction

Section 2B of the Wills Act (7 of 1953) provides:

> "If any person dies within three months after his marriage was dissolved by a divorce or annulment by a competent court and that person executed a will before the date of such dissolution, that will shall be implemented in the same manner as it would have been implemented if his previous spouse had died before the date of the dissolution concerned, unless it appears from the will that the testator intended to benefit his previous spouse notwithstanding the dissolution of his marriage."

This provision has, to date, received relatively little attention from the courts and academic writers. Its "paramountcy carve-out" (termed as such in *Wallage v Williams-Ashman NO* (2023 (4) SA 113 (SCA) par 25) (*Wallage*) has been the focus of litigation on the provision. The paramountcy carve-out refers to the fact that a testator's intention, expressed in a will, to benefit a former spouse notwithstanding the dissolution of their marriage, trumps the testator's presumptive intention that underpins section 2B, namely that a testator who dies within three months of the dissolution of that testator's marriage would not have intended to benefit a former spouse. The paramountcy carve-out survived challenges in *Louw NO v Kock* (2017 (3) SA 62 (WCC)) (*Louw*) and *JW v Williams-Ashman NO* (2020 (4) SA 567 (WCC)) (*JW*), the appeal against the latter judgment having been dismissed in Wallage. An interesting feature of these cases is the courts' descriptive terminological inconsistency regarding section 2B. This inconsistency is mirrored in academic writing. In this note, the authors address the inconsistency by enquiring into what section 2B does and how the section does it. The authors evaluate the courts' and academic writers' responses to these questions and motivate their views regarding the provision's appropriate classification.

2 What does section 2B do?

This question concerns how section 2B is applied to exclude a former spouse from a testator's will. Stated differently, where is section 2B situated among the devices used in South Africa's testate succession law? The courts and academic writers have identified several possible answers to this question.

2 1 Section 2B revokes a will or provisions in a will

"Statutory revocation on divorce" is one of the terminological descriptions used for section 2B; Sher J said it causes "a prior will … to be treated as

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having been revoked insofar as a testator's former spouse is concerned" (*JW supra* par 36). In support, Sher J referenced the South African Law Commission's recommendations in its report *Project 22: Review of the Law of Succession* (June 1991) (*Project 22 (1991)*). The Commission's recommendation regarding what would eventually become section 2B is contained in its proposals on revoking wills owing to changed circumstances (*Project 22 (1991)* par 3.51–3.63). Unsurprisingly, several authors include section 2B in their discussions on the revocation of wills (see Hofmeyr and Paleker *The Law of Succession in South Africa* 3ed (2023) 184–186; Jamneck and Rautenbach (eds) *The Law of Succession in South Africa* 4ed (2023) 100; De Waal and Schoeman-Malan *Law of Succession* 5ed (2015) 102–104).

When evaluating the plausibility of section 2B having a revocatory effect, it must be borne in mind that the revocation of wills is primarily governed by the common law. The common law sets two requirements for revoking wills expressly or tacitly: a) the testator must have performed a valid revocatory act; and b) the testator must have possessed the intention to revoke a will or a part thereof (the *animus revocandi*). Section 2A of the Wills Act augments the common law by permitting the judicial condonation of certain acts not recognised as valid revocatory acts by the common law, provided the testator possessed the requisite *animus revocandi* when these acts were performed. A revoked will loses its legal force from the moment of its revocation. This loss of legal force is permanent unless the testator later revives the revoked will, typically by executing a reviving document evincing the testator's intention to bestow legal force anew on the still-existing revoked will (see the discussions by Hofmeyr and Paleker *The Law of Succession in South Africa* 166–195; Jamneck and Rautenbach *The Law of Succession in South Africa* 100–116; De Waal and Schoeman-Malan *Law of Succession* 88–109; and see *Moses v Abinader* 1951 (4) SA 537 (A); *Wessels NO v Die Meester* [2007] SCA 17 (RSA) on reviving a revoked will).

When measured against the common law on revoking wills, section 2B presents atypically. First, the section does not require the testator to perform an act of revocation. The dissolution of the testator's marriage and the testator's death within three months of such dissolution suffice to exclude the testator's former spouse from the will. Secondly, the position of the testator's former spouse under the will is restored merely by the lapse of three months post-dissolution. This is a far cry from the common-law requirements for reviving a revoked will. Thirdly, while the common law permits the partial revocation of a will (De Waal and Schoeman-Malan *Law of Succession* 82 and 89), section 2B makes no similar allowance for testamentary provisions concerning the testator's former spouse. In fact, Sher J acknowledged in *JW* that section 2B could be seen as overly broad – especially if typified as effecting a statutory revocation – because it affects all testamentary provisions concerning the former spouse. The section could, for example, prevent a former spouse from being appointed as a trustee of a testamentary trust established for the minor children of the erstwhile spouses. This might not have formed part of the testator's presumptive revocatory intention regarding testamentary provisions concerning a former

spouse (*JW supra* par 111). Section 2B could therefore be seen as an overreach in some cases if typified as revocatory in nature.

Denoting section 2B as effecting a statutory revocation is thus open to criticism for being unnuanced because, in important respects, it is not aligned with the common law on revoking wills. Nevertheless, the authors regard it as a plausible, even though not preferred, terminological description, supported by the section's developmental history and the weight of authority favouring this classification.

Interestingly, De Waal and Schoeman-Malan, despite dealing with section 2B in their discussion on revoking wills, typify the section specifically as causing the lapsing of a will or those provisions in a will concerning a testator's former spouse. Instructively, the authors distinguish section 2B from tacit revocation under the common law because the latter involves a revocatory act performed by a testator from which the *animus revocandi* is deduced. As shown earlier, when section 2B applies, there is no revocatory act from which a testator's revocatory intention is discernible (De Waal and Schoeman-Malan *Law of Succession* 102–103).

The authors acknowledge that the South African common law and statute law are familiar with wills lapsing upon expiry of a period. For example, Roman and Roman-Dutch law recognised the soldier's will (*testamentum militis*), made orally or in writing without formalities by a soldier on active service. The common-law soldier's will remained valid for a year from the time of a soldier's honourable discharge, after which it lapsed *ex lege* (Corbett, Hahlo, Hofmeyr and Kahn *The Law of Succession in South Africa* (1980) 44). Before its repeal in 1992, section 3 of the Wills Act provided for the soldier's will. Section 3(2) stipulated that a soldier's will shall be valid only if its maker died while, or within one year after ceasing to be, on active service with any of South Africa's armed forces: the will lapsed *ex lege* beyond these periods.

The consequences of (tacit) revocation and the lapsing of a will or some of its provisions appear virtually indistinguishable: both deprive a will or some of its provisions of legal force (De Waal and Schoeman-Malan *Law of Succession* 100). If, as De Waal and Schoeman-Malan argue, section 2B causes a will, or provisions in a will, to lapse temporarily, it is equivalent to saying it revokes or cancels that will, or those provisions, for a period. Given that the soldier's will, the last instance of *ex lege* testamentary lapsing, disappeared from South African succession law more than three decades ago, it seems preferable, in the interest of clarity, to engage with section 2B based on revocation and not lapsing. Of course, this means the already-mentioned criticism regarding classifying the section as a revocatory provision stands.

2 2 Section 2B disinherits a former spouse

Regarding section 2B, Sher J said that "the provision disinherits the former spouse" (*JW supra* par 2, see also par 109). The Supreme Court of Appeal subsequently endorsed this classification when Unterhalter AJA said:

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"Section 2B thus disinherits the previous spouse, by operation of law, should the testatrix die within the three month period" (*Wallage supra* par 19, see also par 22–23). The authors regard this classification of section 2B as problematic. "Disinheritance" could be seen as a colloquial term and not a legal one, especially given that it is not used in any of South Africa's statutory inheritance laws (Sonnekus "Onterwing van 'n Bloedverwant en tog 'n Regterlike Diskresie om die Testateur se Laaste Wilsuiting te Minag?" 2019 *TSAR* 667 674). Until 2021, a testator's choice of who and who not to institute as testamentary beneficiaries was as legally irrelevant as a suitor's decision to ask for one sister's hand in marriage and not the other's: the law took cognisance of neither the testator's nor the suitor's choice (Sonnekus 2019 *TSAR* 667 679). This is so because, to build on Sonnekus's analogy, just as love is blind, so can a testator select testamentary beneficiaries arbitrarily and capriciously. In principle, therefore, "disinheritance" is an inelegant term to describe what occurs when section 2B applies.

The Constitutional Court thrust disinheritance into the spotlight when it handed down its judgments in *King NNO v De Jager* (2021 (4) SA 1 (CC)) (*King*) and *Wilkinson v Crawford NO* (2021 (4) SA 323 (CC)) (*Wilkinson*). In *King*, female descendants were excluded as fideicommissaries under a testamentary *fideicommissum*. The court labelled this exclusion a "disinheritance" (*King* par 19, 33 and 214 (among others)). *Wilkinson* dealt with the exclusion of adopted children as beneficiaries under a trust. Majiedt J again likened this exclusion to an "out-and-out disinheritance" (*Wilkinson supra* par 162). The disinheritances in both cases were found to be unfairly discriminatory, contrary to public policy and hence unconstitutional. It is important to note, however, that the decisions in these cases (or aspects thereof) have elicited stern criticism from academic commentators (see Harding, Du Toit and Humm "*King NNO v De Jager* 2021 (4) SA 1 (CC): Three Perspectives" 2022 *Stell LR* 501; Van Zyl "The Role of Public Policy in *King v De Jager* (CCT 315/18) [2021] ZACC 4 (19 February 2021)" 2024 *PER/PELJ* 1; Du Toit "*Drittwirkung* and the Public/Private Divide in the Law of Gifts: Troublesome Developments in South Africa" 2024 *JICL* 235). This criticism casts doubt on attributing legal significance to disinheritance and thus on situating disinheritance among devices in South African testate succession law. It underscores the inelegance of using disinheritance to classify section 2B.

Notwithstanding the criticism levelled at *King* and *Wilkinson*, these judgments constitute the current positive law. The two cases, therefore, have brought disinheritance into the legal terminological mainstream. In fact, Mhlantla J defined "out-and-out disinheritance" as "the absolute exclusion of an individual or individuals from inheriting in terms of a will" (*King supra* par 14, fn 18). This seems to occur when section 2B applies. However, it is important to remember that the judicial focus on disinheritance in *King* and *Wilkinson* happened in a specific context – namely, the unfairly discriminatory exclusion of someone from benefitting under a will or trust. It is submitted that, if disinheritance is to be afforded (controversial) legal significance, this context is its sole domain. Section 2B's context is radically different. The South African Law Commission's report, *Project 22 (1991),* makes it clear that the provision fulfils several legitimate purposes, chief of

which are to give effect to a testator's presumptive intention not to have testamentary benefits bestowed on a former spouse, and to prevent an over-provision (through testamentary benefitting) to a former spouse after a final distribution of assets has been made at the time the spouses divorced (*Project 22 (1991)* par 3.54). Constitutional challenges to section 2B failed in *JW* and *Wallage*. In the latter case, the Supreme Court of Appeal confirmed that excluding a former spouse from a will in terms of the section constitutes neither an arbitrary deprivation of property as contemplated in section 25(1) of the Constitution (*Wallage supra* par 23) nor does it, and especially its paramountcy carve-out, occasion procedural unfairness as contemplated in section 34 of the Constitution (*Wallage supra* par 32). The contextual differences between what occurred in *King* and *Wilkinson* on the one hand, and the exclusion of a former spouse from a will according to section 2B on the other, coupled with section 2B's sound constitutional foundations affirmed in *Wallage*, puts section 2B well beyond *King* and *Wilkinson*'s disinheritance context, which confirms the inelegance of classifying section 2B as a statutory provision that disinherits a testator's former spouse.

2 3 Section 2B disqualifies a former spouse from inheritance

In *Louw*, the plaintiff's counsel argued that section 2B effects a statutory disqualification of a former spouse (*Louw supra* par 16 and 20). Meer J seemingly concurred with this description, albeit in an *obiter dictum* (*Louw supra* par 21). It is not clear what Meer J contemplated when she used the term "statutory disqualification" regarding section 2B. If she had a deprivation of the capacity to inherit (*testamenti factio passiva*) in mind, akin to someone unworthy to inherit, the authors do not commend such a classification. The typical cases of unworthiness recognised by the common law involve punishable or reprehensible conduct perpetrated against the deceased (see the discussions by Hofmeyr and Paleker *The Law of Succession in South Africa* 140–148; Jamneck and Rautenbach *The Law of Succession in South Africa* 125–134; De Waal and Schoeman-Malan *Law of Succession* 115–119). In order to prevent a testator from being defrauded or unduly influenced, section 4A of the Wills Act disqualifies certain persons and their spouses from testamentary benefits because they participated in a will's execution (see the discussions by Hofmeyr and Paleker *The Law of Succession in South Africa* 152–154; Jamneck and Rautenbach *The Law of Succession in South Africa* 134–136; De Waal and Schoeman-Malan *Law of Succession* 120–124). Sonnekus (2019 *TSAR* 667 669) correctly points out that these norms establishing unworthiness to inherit, be they of common-law or statutory origin, are objective law norms and, as such, operate *ex lege* and independently of a testator's intention and volition. Someone who, for example, murdered a testator's *conjunctissimus* will not inherit even if the testator forgave that person and named them in a subsequent testamentary bequest (see Du Toit "Erfregtelike Onwaardigheid: Enige Lesse te Leer vir die Suid-Afrikaanse Reg uit die Nederlandse Reg?" 2012 *Stell LR* 137 154). The contrary holds for section 2B: a former spouse's exclusion from a will in

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terms of this provision, based on the testator's presumptive intention, is not absolute and will be defeated by the testator's actual intention to the contrary under the paramountcy carve-out. Moreover, the Supreme Court of Appeal was adamant that section 2B does not permit extrinsic evidence to be adduced to activate the paramountcy carve-out (*Wallage supra* par 25–27). On the other hand, section 4A(2)(*a*), creating an exception to the general disqualification in section 4A(1) of those involved in a will's execution, is not similarly constraining and permits a court to rule – necessarily based on evidence adduced – that someone involved in a will's execution can inherit because that person did not defraud or unduly influence the testator.

It is submitted that the differences between what occurs when section 2B applies on the one hand, and when the common-law and statutory disqualification rules are applied on the other, render it dubious and arguably misconceived to classify section 2B as a disqualifying provision (in the sense that it negates a former spouse's capacity to inherit). In the authors' opinion, this is section 2B's least-suited classification.

2 4 Section 2B restricts or suspends a testator's freedom of testation

It is submitted that this is the most appropriate description (and thus classification) of what section 2B does: it restricts or suspends a testator's freedom to benefit a former spouse in a will for three months following the dissolution of their marriage. Sher J acknowledged this reality when he remarked that section 2B limits a testator's right to dispose of assets in favour of their former spouse (*JW supra* par 108). He was more explicit when he later said that section 2B aims to "divest a testator/testatrix of their right to dispose of their assets, which materially impacts on their fundamental right to freedom of testation and ownership" (*JW supra* par 112). The Supreme Court of Appeal subsequently espoused a corresponding view when Unterhalter AJA noted that section 2B occasions a "diminution" of a testator's freedom of testation (*Wallage supra* par 10). Section 2B is, therefore, a statutory restriction on, or suspension of, freedom of testation that permits a will's provisions (or some of them) to be disregarded and the testator's assets (or some of them) to devolve in a manner that does not accord with the will's express dictates.

This classification is open to a possible two-pronged objection. First, the departure from a will's provisions concerning a former spouse under section 2B is based on the testator's presumptive intention not to benefit the former spouse immediately after their marriage dissolved (*Wallage supra* par 19). Therefore, a former spouse's exclusion under a will accords with, rather than deviates from, a testator's probable intention at the time of that testator's passing. As such, section 2B does not diminish freedom of testation. This first prong of the objection relates to a similar argument advanced by Du Toit regarding section 13 of the Trust Property Control Act (57 of 1988) – another statutory provision that is said to restrict a testator's freedom of testation (Du Toit "An Evaluation of the Limitation Imposed Upon Freedom of Testation by Section 13 of the Trust Property Control Act 57 of 1988" 2005 *TRW* 39). Du

Toit reasons that a court order under section 13 to vary testamentary trust provisions, or even terminate a testamentary trust, does not necessarily restrict a testator's freedom of testation if that order conforms to what the testator probably would have intended when the order was made. Secondly, the paramountcy carve-out negates the testator's presumptive intention to exclude a former spouse and puts into effect the testator's true intention to benefit that spouse despite their marriage having been dissolved, thereby preserving the testator's freedom of testation.

The authors proffer the following responses to this possible objection. First, when juxtaposing sections 2B and 13, it is evident that the former differs from the latter in important respects. Chief among these is that a former spouse's exclusion from a will under section 2B occurs *ex lege* (unless the paramountcy carve-out applies), while a departure from the terms of a testamentary trust under section 13 is the result of a court order issued upon the applicant meeting section 13's dual criteria for trust variation. Section 13 demands specifically that a court must be satisfied that a trust founder lacked contemplation or foresight regarding a trust provision's consequences: these subjectivities must be proved on a balance of probabilities (Du Toit, Smith and Van der Linde *Fundamentals of South African Trust Law* 2ed (2023) 95–97). Section 2B contains no corresponding directive: the provision operates on the testator's presumptive intention without requiring proof of that intention (*Wallage supra* par 22). Sections 2B and 13 thus engage the subjectivities regarding a testator's intention fundamentally differently. Therefore, section 13's nuances in dealing with a testator's intention and testamentary freedom do not apply to section 2B and, it is submitted, do not prevent or inhibit section 2B's classification as a statutory restriction on freedom of testation. Secondly, while the paramountcy carve-out ensures adherence to a testator's actual intention and thus freedom of testation, the likelihood of its application is slim to none. When making a will, who provides expressly for inheritance in the immediate aftermath of a marriage dissolving? It is simply not something that occurs as a matter of course. Unsurprisingly, Hofmeyr and Paleker (*The Law of Succession in South Africa* 185) state: "If the will was made at a time when dissolution of the marriage was not contemplated by the testator – which will no doubt often be the case – it seems most unlikely that the intention in question will appear from the will." In the authors' view, the paramountcy carve-out's limited (almost non-existent) effect does not prevent or inhibit section 2B's classification as a statutory restriction on freedom of testation. At best, it serves as a negligible qualification for such a classification.

It follows that, in most cases where section 2B applies, an outcome is imposed *ex lege* without judicial interrogation of the testator's actual intention and thus the testator's exercise of testamentary freedom. The paramountcy carve-out, giving effect to that intention and freedom, will rarely, if ever, come into play. In this light, it is submitted that section 2B is best classified as a statutory restriction on or suspension of freedom of testation.

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3 How does section 2B do it?

This question concerns how section 2B achieves the outcome of excluding a former spouse from a testator's will. Stated differently: what mechanism does section 2B use to oust a former spouse from a will's provisions? Case law and academic literature have yielded several possible answers to this question.

3 1 Section 2B employs a fiction of predecease

The South African Law Commission initially proposed that a fiction of predecease must be used to exclude a former spouse from a will in the immediate aftermath of a marriage dissolving (*Working Paper 17* on Project 22 *Review of the Law of Succession* (September 1987) par 3.157–3.160; *Project 22 (1991)* par 3.57–3.58). The Commission ultimately abandoned this proposal for several reasons – among others, the uncertainty wrought by using a fiction and its hindrance to legal systematisation (*Project 22 (1991)* par 3.60; see also *JW supra* par 47).

The Law Commission's change of heart did not deter the applicant in *JW* from contending that section 2B indeed provides for a "'false fiction' that a former spouse has predeceased" (*JW supra* par 130). Sher J made short shrift of this contention and reiterated that section 2B's historical development at the hands of the Law Commission and the legislature shows that the provision does not incorporate a fiction (*JW supra* par 131). Sher J also pointed out – rightly, in the authors' opinion – that section 2B does not establish a rebuttable or irrebuttable presumption of predecease (*JW supra* par 133). The provision's developmental history does not indicate that such a presumption is in effect. Meer J's reference to rebutting "the statutory presumption created by s 2B" (*Louw* par 24) is thus erroneous. The authors can therefore dispose of this possibility as one that does not hold water.

3 2 Section 2B lays down an interpretation rule

Jamneck and Rautenbach (*The Law of Succession in South Africa* 260–261) reason that section 2B contains a statutory rule for interpreting wills. The authors thus group section 2B with section 2D. The latter provision indeed contains three interpretation rules for wills. Jamneck and Rautenbach's reasoning suggests that section 2B instructs the interpretation of a will by denying the former spouse's survival, thereby depriving them of the benefits conferred by that will.

It is doubtful that Jamneck and Rautenbach's reasoning is correct. Testamentary interpretation involves determining a testator's "elusive intention" when the testator failed "in stating and expressing his or her intention clearly and simply" (De Waal and Schoeman-Malan *Law of Succession* 220). A lack of clarity or simplicity does not usually beset wills subject to section 2B. On the contrary, these wills generally record a testator's intention (when the will was made) to benefit the (now former) surviving spouse clearly and unambiguously. *JW* and *Wallage* provide a

good example. In this case, the testatrix, Nicola Wallage, executed a will shortly before her marriage to the applicant/appellant. She bequeathed her entire estate to her "husband" (*JW supra* par 5). The testatrix committed suicide within three months of the spouses' divorce, rendering section 2B applicable (*JW supra* par 12–18). Of course, the question was whether the appellant should remain the testatrix's sole heir, notwithstanding their divorce. When the Supreme Court of Appeal had to adjudicate the matter, Unterhalter AJA said – rightly, in the authors' view – that "[t]here is no issue as to the identification of Nicola Wallage's will, nor as to what it says" (*Wallage supra* par 30). The will, therefore, spoke clearly and simply on the matter of the appellant's sole heirship. Unterhalter AJA was adamant that the matter of whether the appellant's sole heirship should stand "is not cured by principles of interpretation as to what the will means" (*Wallage supra* par 31). Rather than being cured by "principles of interpretation", the matter is cured by section 2B. This provision of the Wills Act is thus not one of those "principles of interpretation": a will is not being interpreted when section 2B applies. Unterhalter AJA's potent reasoning shows why section 2B does not establish a rule for interpreting wills.

3 3 Section 2B is a deeming provision

In *Louw*, Meer J said regarding section 2B: "The section clearly means that the death of one of the previous spouses within three months after a divorce, will result in the surviving previous spouse being deemed to be predeceased and thus unable to inherit" (*Louw supra* par 15). In the authors' view, this answers the question regarding the mechanics of section 2B's operation: it contains a deeming provision regarding a former spouse. In short, a deeming provision "has the effect of causing something to be treated as if it were something that it is actually not" (*OB v LBDS* (2021 6 SA 215 (WCC) par 24, referencing *HV v CV* (2019 ZAWCHC 74 (21 June 2019) par 6). In *S v Rosenthal* (1980 1 SA 65 (A) 75G–H), Trollip JA said that a deeming provision is used "to predicate that a certain subject-matter, eg a person, thing, situation, or matter, shall be regarded or accepted for the purposes of the statute in question as being of a particular, specified kind whether or not the subject-matter is ordinarily of that kind". The legislative purpose must be considered when construing a deeming provision *(Eastern Cape Parks and Tourism Agency v Medbury (Pty) Ltd t/a Crown River Safari* (2018 4 SA 206 (SCA) par 29).

Sher J typified section 2B as a deeming provision in *JW*. He explained that, in terms of this section, "if certain stipulated events occur then it will be deemed that the former spouse predeceased the testator spouse, unless a contrary intention appears from the will" (*JW supra* par 131). Put differently, if a testator dies within the three-month post-dissolution period that section 2B lays down, the "indisputable conclusion" will take effect that the will is implemented as if the former spouse, although alive, had died before the marriage's dissolution (*JW supra* par 132). The legislative purpose is to give effect to the testator's presumptive intention to exclude the former spouse from the will. The paramountcy carve-out is the only qualification to this

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conclusion. The authors concur with Sher J's view and see this as the correct explanation of section 2B's inner workings.

4 Conclusion

It is acknowledged that many of the answers proffered to the two questions posed regarding section 2B in this note can explain what the provision does and how it does it. Some of these explanations are better than others, but most elucidate why and how the provision excludes a former spouse temporarily from a testator's will. However, identifying the best or most appropriate explanation strengthens the internal order and methodological consistency of the South African law of testate succession. As such, it is submitted that section 2B is a statutory restriction on, or suspension of, a testator's freedom of testation, and it manifests as a deeming provision to attain this end.

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