

practitioners somewhat marred his usefulness as a judge. He was not a lover of corporations and they sometimes thought they fared badly at his hands, his views being largely in sympathy with those of what Abraham Lincoln called the common people.

He inspired strong feelings of affection among his intimate friends and amongst all great respect for his undoubted ability and the fact that he could be neither coaxed nor bullied into swerving from what he thought the right course. Canada is the poorer by his death and we can hardly see how his place can be adequately filled, either on the bench or in the important international matter which was engaging his attention at the time of his death.

Mr. Armour was called to the bar in 1853, having commenced his studies with his brother, the late Mr. Robert Armour, whose son, E. Douglas Armour, K.C., has taken a distinguished place at the bar of Ontario, and is the author of our best treatises on the law of real property. He was subsequently in the office of the Honourable P. M. M. S. Vankoughnet, afterwards Chancellor of Upper Canada. In March, 1858, he was appointed County Attorney for Northumberland and Durham. In 1867 he was made Q.C., and in 1871 elected a Bencher of the Law Society. On November 30, 1877, the Hon. Edward Blake being then Minister of Justice, Mr. Armour was appointed a Judge of the Court of Queen's Bench; becoming Chief Justice of that court ten years afterwards, on the recommendation of Sir John A. Macdonald. In July, 1900, he succeeded Sir George Burton as Chief Justice of Ontario, and in November, 1902, was called to the Supreme Court of Canada.

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*THE ONTARIO LORD'S DAY ACT.*

The distribution of legislative power which the British North America Act makes between the Dominion and Provincial legislatures must inevitably from time to time give rise to doubt as to the precise limits of the authority of the respective parliaments. Such a doubt has arisen recently in reference to the Ontario Lord's Day Act as it now stands in the Revised Statutes of Ontario, and the question of the validity of the Act was recently submitted to the Court of Appeal.

The majority of that Court sustained the Act as it stands in R.S.O. (1897), c. 246. The late Chief Justice Armour, however