

concerned, of all charge of perjury (Dom. St., 32 Vic. c. 26, objected to and amended 32-33 Vic. c. 23, s. 3).

Our legislative subordination may be illustrated by two other cases: An imperial statute provided that affidavits made in Great Britain should be received in Canadian courts; and, of course, we had to receive them, although it was contrary to our practice to do so (*Gordon v. Fuller*, 1836, 5 U.C., O.S. 174). But it would be quite out of the question that we should enact that affidavits made in Canada should be received in English courts; and just as much out of the question that we should presume to punish the makers of the English affidavits for perjury if their assertions were false.¹

Upon similar principle, British bankruptcy proceedings have certain effects in Canada, while similar proceedings in Canada have no corresponding effects in Great Britain. For example, lands in Canada will vest in an English registrar in bankruptcy by virtue of the Bankruptcy Acts, but no Canadian law could have any effect upon a bankrupt's land anywhere outside of Canada (*Callender v. Lagos*, 1891, A.C. 460). So, too, a British discharge of the bankrupt is effective throughout the Empire, whereas a discharge in Canada has no effect whatever in Britain. One British judge said that "it might as well be said that the laws of the state of Maryland would apply here." Another said that the colonial law "has the same force here as the law of a foreign country has" (*Bartley v. Hodges*, 1861, B. and S. 375).

Naturalization. — The principle under discussion has very remarkable application to the subject of naturalization of aliens; for, while we can turn an alien (an American, for

¹ In the same way an imperial statute may provide that British medical men shall be permitted to practise their profession in Canada; but Canada could give her citizens no status in the United Kingdom or elsewhere (*Reg. v. College of Physicians, etc.*, 44 U.C., Q.B. 566).