the business of the country, and the instincts of the people, combined with his large legal attainments eminently fitted him for the position he has just resigned. Failing health, however, has recently prevented his taking that active control of the business of the Court which is one of the duties of its chief. His successor is Hon. William Johnston Ritchie, who has heretofore been one of the Justices of the Court. Mr. Ritchie is admitted to be an excellent lawyer and will, we trust, in his new position develope many of the qualities which rendered the appointment of his predecessor so acceptable to the country as chief of the court of highest resort in the Dominion. We congratulate him upon his promotion.

The seat rendered vacant by the promotion of Mr. Justice Ritchie has been filled, as of course, from the Province of Ontario, and the Senior Puisne Judge of the Court of Common Pleas, Mr. Justice Gwynne, has been selected. We are very glad and very sorry. Glad that such a conscientious, hard-working public servant should receive a promotion to which he is justly entitled, and sorry that a Judge in whom both the profession and the public in Ontario have such entire confidence, and a man so esteemed by all, and so beloved by his own intimate circle of friends, should be removed from our midst. We venture to predict that he will not be the least important factor in the Supreme Court, either in the keenness of his intellect or the extent of his learning. His extensive knowledge of equity jurisprudence, also, will render him a most useful member of a Court where so large a portion of the work that falls to it is based on the civil law.

The Supreme Court, for years before its organization, was thought to be almost a necessity. There are those now who think that, owing to the peculiar circumstances of this Dominion, it cannot be of that great practical use and benefit which its founders expected. There are not wanting some who say that it has been in a measure a failure. It is not, therefore, saying too much when we assert that it is now, and will be for some few years to come, on its trial. It has great disadvantages to contend against. If it succeeds in retaining that confidence which the public and the profession were so willing to accord to it when it commenced its labours, those who compose the Court may take credit for having succeeded in a difficult task. We shall not now suggest the possibility of a failure in this, and shall only wish it all success for the future.

DOWER AS AFFECTED BY THE STATUTE OF LIMITATIONS.

(Continued.)

From the digression in the last paper on this subject advocating a change in the law so as to provide for the vesting of the widow's estate in dower immediately upon the death of her husband, we return to consider whether the widow's right is gone ten or twenty years from the husband's death (as the case may be), if she has been all the time occupying the land with her children, but without having her share set apart.

If then the mother remains in possession with her infant children, after her husband's death, by what right or under what title is she there? Not as dowress, it is true. Neither is she to be accounted as tortiously in possession as a trespasser though it is spoken of in the old books as an abatement or disseisin when the widow enters upon the freehold before the actual assignment of dower, yet this is only where she claims to enter *qua* dowress (Dalison 100), and after