unjust; but, at the same time, it should be remembered that a similar situation has existed for years in regard to divorces granted by Scottish Courts to English wives, and by the Courts of New South Wales to wives from other parts of Australia. A remarriage after such an American divorce is bigamous, and affords in Canada a ground for divorce. The recognised English law on the matter is stated by Dicey as follows, at pp. 381, *et seq.*: "The Courts of a foreign country have jurisdiction to dissolve the marriage of any parties domiciled in such foreign country at the commencement of the proceedings, even though the ground for divorce is not recognised in the country of domicile at the time of the marriage or in the country of which the parties are subjects. The leading case on the point is *Bater* v. *Bater*, [1906] P. 209, 75 L.J. (P.) 60: "The husband and wife were British subjects domiciled in England; after their marriage the husband acquired a domicile in New York; the wife obtained in New York a divorce on grounds recognised there, but not so recognised in England; the divorce was held to be valid." Dicey goes on to explain that the Courts of a foreign country have no jurisdiction to dissolve the marriage of parties not domiciled in such foreign country at the commencement of the proceedings, with the exception that the Courts of a foreign country where the parties are not domiciled have jurisdiction for English purposes to dissolve a marriage, if the divorce granted by such Courts would be held valid by the Courts of the country where at the time of the proceedings the parties were domiciled. The leading case here is *Armytage* v. *The Att'y-Gen'l*, [1906] P. 135, 75 L.J. (P.) 42: The husband was domiciled in New York; his wife obtained a divorce in South Dakota; the New York Courts treat this as a valid divorce; it is therefore treated as valid by the English Court. As already explained in the chapter on jurisdiction in Provinces with Divorce Courts, a party can not for purposes of divorce give a Court otherwise without jurisdiction the right to try the action. At one time it would appear that this was not so—see *Stevens* v. *Fisk* (1885), Cam. Cas. 392, but the principle is certainly followed at Ottawa in regard to applications by men who have previously ill-advisedly consented to the jurisdiction of the American Courts — see the *Campbell* case of 1914 and the *Gordon* case of 1921. It might be pointed out before leaving the question of foreign divorces that in *J.* v. *C.*