

divorce from the Bond to the present. It was introduced in answer to the 'Observation' of Bishop Beilby Porteus, which 'Observation' was clearly due to an oversight.

It may be noticed in passing that, though this seems to be the first case of the admission of adultery to be a cause for divorce *a vinculo* in a general and not special English law, yet in Massachusetts, in the Act passed March 16, 1786, and in the Statute in New York passed March 30, 1787, adultery is admitted to be a cause for dissolution of marriage.

In NOVA SCOTIA at the present day a divorce from the Bond of matrimony may be granted for 'impotence, adultery, *cruelty*, or kindred within the degrees prohibited.'

In PRINCE EDWARD ISLAND, Cruelty is not a cause for divorce *a vinculo*, but the causes are 'impotence, adultery, and consanguinity,' as in New Brunswick.

Thus much for the Maritime Provinces.

In Canada proper—that is, in Quebec and Ontario—the procedure is different, and is similar to the process in England before 1857. Special Bills for divorce in individual cases have to be introduced into Parliament, and they have to be there discussed before they are passed. It seems that from 1867 to 1888 twenty-three Bills have been passed in the Dominion Parliament for divorce because of adultery, and ten such applications have been rejected.

This latter information (about Quebec and Ontario) is due to the courtesy of Mr. J. A. Gemmill, the author of a well-known book on Parliamentary Divorce in Canada.