

there are others who think that it is not an ideal tribunal in divorce cases. These would prefer to have a Court specially charged with such causes, which, whilst not relaxing the strictness that ought to prevail where it is sought to disturb the marriage relation, might yet be accessible to all persons rightly entitled to relief. It must, however, be remembered that in recent years great changes have been made in the Senate procedure, simplifying it and reducing the expense, largely owing to the exertions of Senator Gowan, whose long judicial experience eminently qualified him for the task. The tribunal for divorce in the Senate is now a Committee composed of the learned gentleman above referred to (as Chairman) and eight others, all of whom with one exception are professional men. The examination of witnesses and the general procedure is the same as in an ordinary Court of Justice, and the report of this Committee practically settles all questions for the Senate. Mr. Gemmill in his work on divorce enters into the question of the relative merits of legislative and judicial tribunals, and those interested in that branch of the subject will there see the arguments pro and con.

One important decision of the Senate on an application for divorce should be noticed here, as dealing with the effect of divorces of Canadian marriages granted by United States Courts. A petition for a divorce was presented to the Senate in 1887 by one Susan Ash. The petitioner was married to one M. in Kingston, Ontario, in 1868. She lived with him there only six weeks and then with his consent went to visit her father in Montreal. After spending six weeks in Montreal, she returned home to Kingston, when she found that during her absence her husband had sold his property and given up house-keeping. After living with him for a short time in a boarding house, she left him on account of his intemperate habits, which rendered living with him intolerable, and returned to her father in Montreal, where she continued to reside at the time of the proceedings in the Senate for a divorce. In the meantime her husband had gone to the United States, and in 1874 obtained from a Massachusetts Court a divorce from his wife on the ground of desertion by her. The decree of divorce contained a recital that M. had resided in Boston for five consecutive years immediately prior to his application for divorce, but no evidence was given before Parliament to support the truth of this recital. In 1874 after obtaining this divorce, M. married another woman in