

pediment of relationship existed. This is described by a well-known writer as a "relationship which might consist in some remote or fanciful connection between the parties or their god-parents." Later on, and particularly after the Reformation, resort was had to Parliament for private Acts authorizing divorce and permitting re-marriage, owing to the fact that there were no courts having jurisdiction to decree a divorce *a vinculo*. This remedy was adopted by no less a person than Royalty, in the case of Henry VIII. The first Private Divorce Act related to the Marquess of Northampton, whose re-marriage after a decree of separation by the Ecclesiastical Court was declared to be valid by a Commission under the Archbishop of Canterbury. This was further confirmed by statute, and, indeed, it was accepted law that a statute was necessary. Acts of Parliament became more frequent in the 17th and 18th centuries until 1798, when Lord Chancellor Loughborough succeeded in getting certain remedial orders passed by the House of Lords. Applications for absolute divorce had, under this new practice, to be founded on Ecclesiastical decrees and verdicts at law in crim. con. actions, or good grounds shewn why such verdicts could not be obtained. The ground was adultery. A Royal Commission sat and reported. It was felt that a gross injustice was being done to the great body of the people who could not afford the cost of these expensive proceedings. As a result, the Act of 1857, known as the Matrimonial Causes Act was passed. During the discussion on the bill, the Attorney-General stated that the object was to create a new tribunal which may hereafter have to administer other laws made under happier auspices. The new court was composed of several judges, but subsequently power was given to a single judge. The sittings were to be held in London, Middlesex or elsewhere, but the latter provision was never carried into effect. The Act was amended at various times, and now the position of matters is that a husband may obtain a complete divorce on the ground that his wife has been guilty of adultery since marriage, but a woman can only get relief by shewing that the husband has been guilty of adultery coupled with such