

In 1891 he went on a special mission to Washington in connection with the Behring Sea question. He was looked upon by his colleagues and the Bar of the Dominion as a strong man well versed in the principles of law. He codified the laws on the subject of bill of exchange and promissory notes and had a great deal to do with the drafting of the Criminal Code of Canada.

He was considered an eminent jurist and his experience at the Bar and his long experience as Deputy Minister of Justice gave his judgments great weight. He was easy of approach, more so than most of the judiciary are credited with being. A modest and genial man willing and ready to assist and greatly beloved by all the members of the Bar especially the younger members. He was well versed in legal matters and with his long experience as Deputy Minister of Justice he was enabled to apply the principles in cases which came before him and his conclusions were clear and well expressed. His special knowledge of legislation and the practice of the Maritime Provinces rendered him a valuable judge of the Supreme Court of Canada. His death will cause a vacancy on the Supreme Court Bench which will be hard to fill.

MANITOBA BENCH.

The Manitoba Legislature has created a Court of Appeal by an Act which came into force on the twenty-first day of July last. The Court consists of four judges, Chief Justice H. M. Howell, K.C., appointed from the Bar; puisne judges; A. E. Richards and W. E. Perdue taken from the King's Bench, and I. H. Phippen, K.C., from the Bar. The Court of the King's Bench is to have only three judges instead of four, Chief Justice Dubuc remains, and the puisne judges are Mr. Justice Mathers and Mr. Justice D. A. MacDonald, the latter being taken from the Bar. The Chief Justice of the King's Bench still retains the title of Chief Justice of Manitoba, but upon his death or retirement the Chief Justice of the Court of Appeal will be Chief Justice of Manitoba.