

secs. 1, 10, 13, 14 of c. 4.; secs. 4, 9, 17, 22 of c. 6; secs. 7, 12, 18, 20, etc., of c. 21. And from this time forward, this mode of numbering has become decidedly predominant, sometimes the principal section being numbered twice; first with its proper number as a section, and then with the figure 1 in brackets (1) as a sub-section, and sometimes this is omitted.

The former, and what I am inclined to call the common sense method, cannot, however, as yet, be said to be a wholly extinct species. Sec. 4 of c. 6 of the Ontario statutes of 1892 has sub-sections beginning properly with (1). Sec. 4 of c. 34 of the same statutes has sub-sections beginning with (1). Sec. 4 of c. 90 of the statutes of 1893 has sub-sections beginning also with (1). Sec. 2 of c. 15 of the statutes of 1895 (Ont.) provides that "s. 140 of the Jurors' Act is amended by adding thereto the following as sub-sections, 1, 2 and 3 of the said section." And s. 10 of the Municipal Amendment Act of 1896 provides that: "The following shall be added to s. 44, of the said Act as sub-sec. 1."

While tracing the development of the sub-section I have tried to discover the reason that induced our statute-makers to adopt the present style of numbering. My search has been fruitless. I know of no ground upon which it can fairly be defended. Let us examine its working a little further. Take for instance s. 210 of the Municipal Act (R.S.O. 1887, c. 184). By s. 8 of the Municipal Amendment Act, 1891, this was repealed, "and the following substituted therefor." Then s. 210 is re-enacted with some modifications, as sub-sec. (1); followed by a sub-section numbered (2). And these were re-enacted in the Consolidated Municipal Act of 1892. Now, in citing this will the principal section, or what was such, be called sub-sec. (1) of s. 210? By s. 4, sub-sec. 2, of the Municipal Amendment Act, 1896, sub-sec. (2) of s. 210 is repealed. Will what remains of that section be now cited as sub-sec. (1) of s. 210?

Are all sections of a statute really sub-sections, travelling incognito, to be revealed in their true character only when an extra clause is added?