good. They have sustained a good reputation in their practice: no charge of impropriety, dishonesty, or unprofessional conduct has ever been laid against them so far as the Court records show.

Their Position as Lawyers.—The remainder of the Bar were slow to accept woman as a lawyer; where she has made her appearance, the Bar seems to have gone through the stages of amused curiosity

refused admission as an attorney and counsellor of the Supreme Court—she was not a "citizen" or a "person," and without "clear affirmative words in a Statute" the Court's hands were tied. *Re* Lelia J. Robinson, (1881) 131 Mass. 376.

The "clear affirmative words" soon came: on April 10, 1882, a statute was approved, c. 139, "The provisions of law relating to the qualification and admission to practise as attorneys-at-law shall apply to women." A similar decision in Oregon, *In re* Leonard, (1885), 12 Oregon 93, refusing admission to Mary A. Leonard led to the passing in 1885 of the statute, "Hereafter women shall be entitled to practise law as attorneys in the Courts of this State upon the same terms and conditions as men." See Lord's *Oregon Law*, s. 1079.

Tennessee in 1893 refused admission as a Notary Public to Miss F. M. Davidson in a decision which was considered to indicate that a woman could not be an attorney—the Act of 1907, chap. 69, made the law clear—"Any woman of the age of twenty-one years and otherwise possessing the necessary qualification may be granted a licence to practise law in the Courts of this State." (See Thompson's Shannon's Code of 1917, s. 5779, a, 6.)

Some other like decisions in the State Courts led to special legislation; but in most States, the Courts interpreting general legislation took a different view. The first admission was in a State in the middle West. Iowa in 1869 admitted Mrs. A. A. Mansfield under a statute providing that "any white male person" may be admitted because the affirmative declaration did not by implication deny the right to women. Missouri came next—the Court admitted Miss Barkalow; Maine admitted Mrs. C. H. Nash in 1872. To make the matter absolutely clear, chap. 98 of the Public Laws of 1899 enacts "No person shall be denied admission or licence to practise as an attorney-at-law on account of sex." In the Federal Court, District of Columbia, Miss Charlotte E. Ray was admitted about 1873; and in 1874 Miss Hewlett was admitted by the Federal District Court (Illinois); and the Federal District Court (Iowa) also admitted a woman. See 39 Wis. at pp. 238, 239.

In New Hampshire, in 1890 the petition of Mrs. Marilla M. Ricker, a widow, to be admitted to practise law was granted, the well-known Chief Justice Doe writing an elaborate opinion with a wealth of learning more or less applicable. He came to the conclusion that a woman was a "citizen" and a "person"; and an attorney not taking an official part in the government of the State (for which women are disqualified by the Common Law) there was no reason why a woman could not be an attorney. *In re* Rikver's Petition, (1890), 66 N.H. 207.

Colorado took the same view in 1891 when Mrs. Mary S. Thomas was admitted to the practice of law; she was a "person" and an attorney did not occupy any "civil office." *In re* Thomas, (1891), 27 Pac. Rep. 707; 16 Colo. 441.

Indiana held the same way in 1893—*In re* Petition of Leach exp., (1893), 134 Ind. 665.

The Connecticut Court of Errors *in re* Mary Hall, (1882), 50 Conn. 131, had gone back to the legislation of 1750 in the attempt to interpret the more recent legislation, and holding that Mary Hall was a "person" admitted her to practise—one learned Judge differing from his three brethren.