

or divorce jurisdiction, then it is hard to understand how, by any declaratory or other judgment, it can effectively dissolve or annul a *de facto* marriage, for duress, or any other cause whatever; and the remedy of an aggrieved person is not in the courts, but in the Dominion Legislature: see *Re Stevenson*, 32 Vict., c. 75, in the Statutes of Canada for 1870. In that case it will be seen that one of the grounds on which the applicant claimed relief was that he had been inveigled into the marriage, which if established would apparently, according to the learned Chancellor's opinion, have given the Court of Chancery jurisdiction, a view which evidently did not occur to the promoters of that bill, which was one of the first divorce Acts passed by the Canadian Parliament, the first being *Re Whiteaves* (1868), 31 Vict. c. 95, and both were reserved for the consideration of the Crown, before being assented to by the Governor-General.

In Ontario the Provincial legislation regarding marriage is to be found in the recently revised statute, 1 Geo. V. c. 32. That Act it may be noted recognizes the fact that the 32 Hen. 8, c. 38, is the Act regulating in Ontario the degrees of relationship which constitute an impediment to matrimony.

In the Provinces of Manitoba, Saskatchewan and Alberta by Provincial legislation, the law of England as regards property and civil rights as it was on 15 July, 1870, was introduced; but inasmuch as the Provincial Legislatures had no legislative power to deal with the law of marriage, all those Provinces having come into existence since Confederation, it was impossible for them to introduce the English, or any other law of mar-