

Held, that plaintiff was not a woodman within the meaning of the statute, but was a contractor.

Ladner, for the application. *McQuarrie*, contra.

Grant, Co.J.] IN RE THE NATURALIZATION ACT. [March 25,

Application by Japanese—Jurisdiction—Cross-examination.

In accordance with s. 17 of the Dominion Naturalization Act certain Japanese filed notices of intention to apply for naturalization. Objections to their naturalization were filed: (1) That the applicants were subjects of the Emperor of Japan and not free to change their allegiance; (2) That they did not intend to reside permanently in Canada, (3) That they did not understand the oaths taken by them and were not bound by them; (4) They did not intend to become bona fide British subjects.

Counsel for applicants contended that objections were improper and not within the Act, and cited *In re C. C. Webster*, 7 C.L.J. 39, as an authority that the court could not go behind the certificate of justice or notary and inquire whether the evidence on which it was granted was sufficient.

Held, that by the amendments of 1903 to the Naturalization Act, the scope of the judge's duty, as circumscribed in the decision *In re C. C. Webster*, is changed and that the judge has power to take any necessary measures to satisfy himself as to the truth of the facts stated and of the fitness of the applicant for British citizenship. Cross-examination of applicants ordered.

Haney and *Schultz*, for applicants. *Lucas*, contra.

Book Reviews.

A Concise Treatise on the Law of Wills. By H. S. THEOBALD, K.C. Seventh edition. With notes of Canadian statutes and cases by E. D. ARMOUR, K.C., of Osgoode Hall, Barrister-at-law. London: Stevens & Sons, Ltd., Chancery Lane. Toronto: Canada Law Book Company, Ltd. 1908.

We have referred to this valuable work in our editorial columns.