

ceremony had not been performed by a Rabbi and because she was not of age. The judge held that the marriage was legal under the ruling of the Privy Council in the Tremblay case by which he was bound.

COMPANY LAW—DOMINION AND PROVINCIAL JURISDICTION.

If the Judicial Committee of the Privy Council has no other *raison d'être*, it has at least that of having been able to bring order out of constitutional chaos in the company law of Canada. To the ordinary lawyer and business man, the purpose of the Company Licensing and Registration Acts passed in recent years by most of the Provinces was fully apparent. The Provincial Departments frankly upheld these enactments as compelling companies to come to the Province for corporate authority by way of either a charter or a license. In three of the cases just decided by the Judicial Committee, the judges of the lower courts unanimously declined to regard these Acts in what the Privy Council, agreeing with the practical business man, now holds to be their true character.

The complete history of companies legislation in Canada is of too great magnitude to be given here. Some important phases of it were dealt with at length in the paper read before the late meeting of the Canadian Bar Association, by Mr. Thos. Mulvey, K.C., a recognized authority on company legislation, and whose articles have appeared at different times in this journal. The paper above mentioned will be found in our January number.

Whether the judgment of the Privy Council will give a final *quietus* to Provincial attempts to discriminate in favour of Provincial companies as against Dominion companies, or whether it will still be open to the Provinces to embarrass a Dominion Company by way of Mortmain legislation or otherwise, remains to be ascertained by a perusal of the full text of the judgment.

It will be remembered that the case of *John Deere Plow Co. v. Wharton*, 18 D.L.R. 353, [1915] A.C. 330, decided that the British