

## EDITORIAL ITEMS—QUEEN'S COUNSEL—CHANCERY APPOINTMENTS.

ment as governess under the title of "spinster," when in fact she was a woman divorced from her husband, had committed a breach of warranty, and was not entitled to recover for her services.

So in *Munt v. Glynes*, 20 W. R. 823, the Master of the Rolls refers to the anomalous position in which a lady is placed by a decree for judicial separation: "She is at once divorced and not divorced; no longer a wife, and yet not an unmarried woman." The *Solicitor's Journal* dives into the old cases on the subject, and inclines to the conclusion "that a divorcee (this is nearly as bold a coinage as the famous Belleville term, "*seductee*") might be properly styled 'single woman,' which in strict technicality is applicable to an unmarried woman who is not a virgin." Among other notable things is pointed out that a woman's degree would not be sufficiently stated by styling her "wife of A. B.," unless her husband's mystery or estate were alleged (*Re Gardner*, 1 C. B. N. S. 215), but that the curious description, "spinster, otherwise wife of A. B." has been held sufficient: *Anon.* 3 N. P. C. 19; *Dyer*, 88, a.

On the 13th of December last, His Excellency the Governor-General was pleased to appoint the following Barristers-at-Law to be Her Majesty's Counsel learned in the law, in and for the Province of Ontario, viz: Daniel McMichael, D. C. L., of Toronto; Christopher Salmon Patterson, of Toronto; Edmund Burke Wood, of Brantford; and John T. Anderson and Thomas Moss, of Toronto. All these gentlemen had already received patents from the Lieutenant-Governor of Ontario.

On the 18th December the following gentlemen received a like distinction at the hands of the Governor-General:

Robert Stuart Woods, of Chatham; James A. Henderson, of Kingston; D'Arcy

Boulton, of Toronto; Alexander Leith, of Toronto; Thomas Robertson, of Dundas; The Honorable John O'Connor, of Windsor; Hector Cameron, of Toronto; James Beaty, Junior, of Toronto; George A. Drew, of Elora; James MacLennan, of Toronto; David Tisdale, of Simcoe; Dalton McCarthy, of Barrie, and Hewitt Bernard, of Ottawa, Deputy of the Minister of Justice.

On the 26th December His Excellency appointed the following Barristers of Nova Scotia as Queen's Counsel for that Province, viz:

Alexander James, and James Thomson, of Halifax; The Honorable Henry Williams Smith, Attorney-General of Nova Scotia, of Liverpool; William Almon Johnstone, of Halifax; Hugh McDonald, of Antigonish; Joseph Norman Ritchie, of Halifax; Nathaniel Whitworth White, of Shelburne; Newton Le G. McKay, of Sidney, Cape Breton; the Honorable William Miller, of Halifax: and Alfred William Savary, of Digby.

## CHANCERY APPOINTMENTS.

THE loss of a valuable public servant is always a matter of regret. We felt this when Mr. Mowat left the Bench, though in that case the feeling was not unmixed with regret at the manner in which that retirement took place. We cannot, however, lose sight of the fact, that in Mr. Mowat the country has lost the services of a most able and learned Equity Judge, whose judgments have always been received with confidence by the Bar, and who devoted himself with untiring and patient industry to the very arduous duties of his high position.

Swiftly following on this resignation we have to notice that of Mr. J. A. Boyd, the Master in Ordinary of the Court of Chancery. During the comparatively short time that he held that office he exhibited in a marked manner the best qualities of