

relief, but subject to the provisions in the Act contained and rules and orders made thereunder. The law of the Court, therefore, except as to divorce, is to be the ecclesiastical law or canon law of the Church of England. Can the rights of a subject under that law be said to be "civil rights?"

In law the word civil is used to distinguish secular and temporal rights from religious rights or ecclesiastical rights; thus we talk of civil and religious rights and liberties, not as meaning the same class, but different and distinct classes of rights and liberties. The word "civil" is also used to distinguish ordinary classes of men and things, from criminal, ecclesiastical, military, or political classes of men and things. The matrimonial rights may in one aspect be civil but in another aspect religious or ecclesiastical, *e.g.*, those rights which may be enforced in the temporal Courts may be regarded as civil rights; but those rights which could only be enforced in a Court of ecclesiastical jurisdiction would not appear to be civil but religious or ecclesiastical rights.

CONTEMPT OF COURT.

At a recent somewhat sensational trial for libel, in England, before Darling, J., it was generally reported in the newspapers that one of the witnesses called the learned Judge "a liar" and "a damned liar" in open Court, but it did not appear that any notice was taken of the insult thus offered to the Judge. Recent cases have shewn that the jurisdiction of the Court to commit for contempt ought not to be resorted to merely for the personal vindication of a Judge, but simply and solely to insure and protect the due administration of justice; and yet so gross an insult committed by a witness is, in a very true sense, an interference with the due administration of justice; for, if a Judge may with impunity be thus publicly reviled, that respect for the Bench which is so important an element in securing respect for the law is likely to be very seriously undermined. The great objection to the Judge who is thus publicly insulted imposing any punishment on the offender is the fact that