and the other an absolute dissolution of the marriage relation; but the latter kind of divorce was only granted in the English Courts Christian, where, as in the case of Henry VIII. and Catharine of Arragon, the marriage was null and void *ab initio* on the ground that the parties were at the time of the pretended marriage incompetent to enter into marriage with each other. It is therefore only in this modified sense that divorce can be said to have been part of the Common Law. The divorce *à vinculo* from any other causes than what would constitute grounds for a sentence of nullity of marriage is obviously no part of the Common Law, even assuming that Christianity is part of the law of the land, which, however, has been recently declared by a learned Law Lord to be "mere rhetoric," notwithstanding that the Act of Uniformity remains unrepealed, and the Creeds of the Christian Church are included in a schedule to that Act.

I must also demur to Mr. Thompson's describing the King's Ecclesiastical Courts as "the Court of the King as Head of the Church." They are the Ecclesiastical Courts of the King as Head of the State. The English *Law Times* has more than once drawn attention to the impropriety of describing the Sovereign as "the Head of the Church" and has again done so in a recent number (see Oct. 13, p. 375). The Royal Supremacy is a judicial and governmental Supremacy, not in any way a Spiritual Supremacy. The Sovereign is the Supreme Judge in his own Dominions because the law has definitely declared that, in the British Dominions, there shall be no "*imperium in imperio*." He is the Supreme Judge not only of the Church of England, but of all other religious organizations in his dominions. As such he is the final judge not only of the disputes of Christian religious bodies, as many cases in the reports testify, but also of those of Jews and Mahomedans, so far as such disputes require the exercise of any coercive power. But of course he does not intervene unless his aid is invoked by one or other of the disputants.

The jurisdiction to grant absolute divorces except on grounds of nullity was not claimed or exercised by the Sovereign, or even by Parliament, until after the Reformation, and I believe that the first case in which the Parliamentary jurisdiction to dissolve a