

was held, the subject matter of the statute, the name of the member introducing the Act, or the initial words of the Act were used to designate the Act intended. Instances of such were "The Statute of Westminster 2" (or De Donis) 13 Edwd. I, c. 1; "The Statute of Marlbridge" (52 Hen. III., c. 23); "The Statute of Mortmain" (9 Geo. II., c. 36); "The Nullum Tempus Act" (9 Geo. III., c. 16); "Lord Campbell's Act"; "Lord Denman's Act," etc.

About the year 1850, in England, and shortly after that in Canada, "short titles" began to be introduced, authorized by the Acts themselves, sometimes with the year in which passed, and sometimes without. Among such were, in England, The Common Law Procedure Act, 1852; The Merchant Shipping Act, 1854; The Bankruptcy Act, 1869; Law of Evidence Amendment Act, etc. Of such Canadian Acts may be noticed: The Common Law Procedure Act, 1856; (see sec. 317 of that Act), The Municipal Act; the Judicature Act; The Post Office Act, 1867, etc.

The proper division of statutes into chapters, clauses, sections, etc., and their numbering, seems to have been, at times, matters not altogether free from difficulty. One learned author says: "Statutes are numbered according to rather an inconvenient arrangement; the entire Acts of one session are considered as forming two collections or volumes, one of Public, and one of Private Acts, each Act forming a distinct chapter, and sub-divided into sections." (Brande.) Wharton (Law Lexicon, 8th ed., p. 15,) says: "All the Acts of a session together make properly but one statute, and therefore, when two sessions have been held in one year, it is usual to mention stat. 1 or 2," etc.

This matter of the division of the statutes into chapters and sections, etc., has on several occasions been the subject of judicial comment. "The Consolidated Statutes may be treated as one great Act, and the several chapters as being enactments which are to be construed collectively, and with reference to one another, just as if they had been sections of one statute, instead of being separate Acts." Per Lord Westbury in *Boston et al. v. Lelievre et al.*, L.R. 3 P.C. 162.