to grant a decree of divorce *a vinculo matrimonii*, and, *a fortiori*, to deal with other matrimonial offences, such as divorce *a mensa et thoro*, or judicial separation, nullity of marriage, jactitation of marriage, restitution of conjugal rights, etc. In the Manitoba case, the Judicial Committee held that the Superior Courts of the province had been vested with the right to adjudicate in di orce suits since 1888, if not, indeed, since 1864; and in the Alberta case, that such right had existed since at least 1907, if not since 1886, although this right had never been previously invoked by any litigant.

The result now, therefore, is that in seven out of the nine provinces of Canada an absolute divorce or other matrimonial relief may be obtained in the provincial courts already established, and in two, only, Ontario and Quebec, is it still necessary to adhere to the antiquated, protracted, expensive and illogical system of procuring an Act of Parliament.

In Quebec, moreover, the provincial courts appear to have jurisdiction to annul a marriage on various grounds, such as impotency existing at the time of marriage, on application of the aggrieved party where made within three years of marriage, or for insanity, or where marriage is procured by duress, force, or fraud, or for relationship within the prohibited degrees, etc. A separation from bed and board may also be decreed for certain causes.

In Ontario, it was held in *T.* v. *B.*, 15 O.L.R 224, that a marriage could not be declared null and void upon the ground of impotency at the time of the marriage; in *A.* v. *B.*, 23 O.L.R. 261, Mr. Justice Clute held that even unsoundness of mind of one of the parties at the time of marriage did not warrant a judgment declaring the marriage void *ab initio;* and in *Reed* v. *Aull*, 32 O.L.R. 68, Mr. Justice Middleton held that the Supreme Court of Ontario had no power to declare a marriage ceremony, which had been duly solemnized, void for deceit, fraud, duress, or any other ground, unless brought within sec. 36 of the Marriage Act, R.S.O. 1914, ch. 148, in this dissenting from the dictum expressed by Chancellor Boyd in *Lawless* v. *Chamberlain*, 18 O.R. 296, who had there expressed the opposite view upon the theory that there was a