

no room for doubt; and as the rules of the County Courts in England, framed, as they have been, by eminent and able judges, and sanctioned by the Lords High Chancellor and the Chief Justice, the Master of the Rolls, and other judges of the High Court there, for carrying into force similar provisions, we doubt if there should not be either a set of rules and forms furnished for carrying out the same in our Division Courts, or that a repeal of the sections to which we refer should be had.

With that provision upon the statute book, applicable to both the County and Division Courts of the province alike, it is hard to see upon what foundation the idea rests that they have not equitable jurisdiction.

Yours, etc.,

D.J.H.

St. Thomas, April 26th, 1893.

[We have pleasure in publishing the above letter from our esteemed correspondent. We would, however, refer, in connection with the subject of his letter, to volume 28, *ante* pp. 33 & 34, and to *Foster v. Reeves*, 2 Q.B. 255, which would seem to conflict with the view he expresses that County Courts and Division Courts have the jurisdiction claimed for them. The matter is one of interest, and we should be glad to hear from others on the subject. —ED. C.L.J.]

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## Obituary.

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### THE LATE JUDGE W. D. ARDAGH.

The subject of this sketch (who died suddenly at New York on his arrival from Italy on the 16th of April) was born on the 21st of March, 1828, in the County of Tipperary, Ireland. He was a son of Mr. Stephen Ardagh, of that county, who traced his ancestry to a Welsh family that settled in Ireland about the time of Edward I.

Mr. Ardagh, when about twenty years of age, came to Barrie, and finished his education at the Grammar School here. He entered upon the study of his profession with the late Mr. Strathy (who was at that time practising at Barrie), and was called to the Bar in 1855. Mr. Ardagh then settled in Toronto, and commenced the practise of his profession in partnership with Mr. Crawford, afterwards Lieut.-Governor, and Mr. Hagarty, now Chief Justice of this province. Two or three years later Mr. Hagarty went on the Bench, the firm was dissolved, and Mr. Ardagh returned to Barrie. He then practised in partnership with the Honourable James Patton, and subsequently Colonel Hewitt Bernard entered the firm.