

paratively late instance is *Doyle vs. Falconer* (1866) L. R. 1 P. C. 328. Some of these point out that the Colonial Parliament is not a Court like the Imperial Parliament as it has no judicial functions. But that the power of punishing for contempts which tend to obstruct its proceedings and directly to bring its authority into contempt is inherent in every Supreme legislative authority is affirmed by such cases as *Beaumont vs. Barrett* (1836) 1 Moore P. C. 59.

Since the Governor in Council is not quite the King-in-Council and the Colonial Parliament is not quite the Imperial Parliament, there will sometimes arise a question of the limits of legislative power in the local Parliament, and such cases have been coming before the Committee with great frequency. Occasionally the question may require the elucidation of the common law powers of the Imperial Parliament, as for example as in *Devine vs. Holloway* (1861) 14 Moore P. C. 290, where the effect of a demise of the Crown came under consideration.

But in every case the extent of the power granted to the local Parliament must be looked at, and it has been uniformly held that a local Parliament acting within the ambit of the limits prescribed for it "is not in any sense an agent or delegate of the Imperial Parliament but has plenary powers as large and of the same nature as those of Parliament itself," *The Queen vs. Burah* (1878) 3 A. C. 889 at p. 904; and consequently it can delegate its powers, etc., which no mere agent could do. *Hodge vs. the Queen* (1883) 9 A. C. 117 at p. 132.

These powers must be restrained strictly within the limits prescribed. The Dominion Parliament has "Crim-