

the gates, but should there ever hereafter be an occasion when it would be desirable to do so, as in the case of an *emeute*, all possibility of so doing is prevented. We do not know whether it is the Law Society or the Ontario Government, that is now charged with the care of the fence, but whoever has the responsibility seems at present to be neglecting the duty.

THE last Primary Examination of the Law Society was held on the 14th instant. In future, applicants for admission into the Society must be graduates in arts of any British University, or produce certificates of having passed the junior matriculation in any of the Universities of this Province. The Society is now building an addition for the benefit of the students, to the rear of the East wing of Osgoode Hall, and adjoining Examination Hall. The lower storey is to be used as a hat and cloak room. The second storey, on the level with the main floor will be used as a reading room, and the upper storey is to be divided into two consultation rooms, for the use of the profession. The cost will be a little over \$2,000. The consultation rooms will supply a long felt want, and will enable the Librarian to enforce the regulations for the use of the library for the purposes for which it is intended, for reading and reference. It is now open at nights from 7 to 10.30. The attendance is not very large, averaging about ten each evening.

THE CROWN A CONSTITUENT PART OF THE PROVINCIAL LEGISLATURES.

It must be evident to every reader of the celebrated Queen's Counsel case of *Lenoir v. Ritchie*, 3 S.C.R. 575 (decided in 1879), that some of the learned judges of our Supreme Court who promulgated the heresy that the Crown formed no constituent part of the Legislature, had not fully considered the judgment of Lord Chancellor Cairns in *Theberge v. Landry*, 2 App. Cas. 102 (decided in 1876), in which the power of the Provincial Legislature of Quebec to legislate respecting the prerogative of the Crown was expressly reviewed. If the Crown formed no constituent part of the Provincial Legislature it must follow that none of its legislative acts could touch or in any way affect the prerogative; and it would, therefore, have been a waste of judicial time and learning for the Privy Council to have elaborated a judgment on that question. Not only did the Lord Chancellor review the question as to how far the prerogative was affected by the Provincial Act under appeal, but he committed the Judicial Committee of the Privy Council to a judgment which expressly declared the Provincial Statute to be "an Act which is assented to on the part of the Crown, and to which the Crown is, therefore, a party" (p. 108).

The Lord Chancellor's statement of the law would be meaningless, or illogical, unless the Judicial Committee had decided that the Crown formed a constituent part of the legislative authority of the province; and that the Lieutenant-