

by the cases cited in § 5 consists principally in the fact that it has abolished, so far as the qualification for the franchise is concerned, the distinction established by the courts between occupation as a servant and as a tenant¹

¹ A shop assistant occupied exclusively, by virtue of his employment, a furnished bedroom in a dwelling-house belonging to his employers. The house contained other bedrooms similarly inhabited by other persons in the same employment, and a dining room in which the inmates of the house took their meals in common which were provided for them by their employers. The inmates had no keys of their bedrooms. The employers did not inhabit the house, but they had a resident caretaker who exercised general control over it, and a resident servant who was not under the order of the inmates, and by whom the domestic service requisite for the rooms was done. *Held*, that there was sufficient inhabitancy of a dwelling-house, by virtue of service, to confer the franchise, and that this was not affected by the joint user of another part of the house. *Stribling v. Halse* (1885) 16 Q.B.D. 248.

H., a servant, occupied exclusively, by virtue of his service, a furnished bedroom in a dwelling-house belonging to his master, and had, in common, with another young man, the use of a sitting room in the same house. All the furniture belonged to the master, who did not reside in the house, but had free access at all times to every portion of it except H.'s bedroom, and had access to that whenever he asked H. for the key, which he had a right to demand whenever he chose. The bedrooms were made up by a charwoman, who was paid by the master, and did not reside on the premises. *Held*, on the authority of *Stribling v. Halse*, *supra*, that H. was entitled to the franchise. *Hasson v. Chambers* (1885) 18 L.R. Ir. 68 (two of the Lords Justices dissented).

Each teacher in a college conducted by a religious community had, as such, during the qualifying period, the exclusive use of a separate bedroom in the college by virtue of his office or employment as a teacher in the college, which was managed by a resident principal, under the supreme control of the superior-general of the community, who himself lived in Paris. The revising barrister having found that each bedroom so occupied constituted a "dwelling-house" for the purpose of the franchise, and was not inhabited by the person by whom the teachers were employed, or under whom they served, it was held that the teachers were entitled to the franchise. *Alexander v. Burke* (1887) 22 L.R. Ir. 443 (following the above cases).

R. was the foreman of a shop and place of business in which a number of young men were employed. By virtue of that employment he and they lived in a separate house, in which he had a bedroom that he occupied exclusively. He and the other employes took their meals in a common sitting room, and the only other resident in the house was a servant, paid by the employer to attend to the occupants. R. had a latch key for the hall door, and had also charge of the other keys and it was his duty to see that the doors were locked, and the occupants within doors, every night. *Held* (dub. FitzGibbon, L.J.), that R. was entitled to the franchise. *Hasson v. Chambers* (1885) 18 L.R. Ir. 68 (69).

C., as his employer's coachman, occupied a room over her stable, and was treated by her as a domestic servant. The stable was in her yard, and was portion of the curtilage of her dwelling-house, the house and yard being all included under the same number in the poor rate book. There was a separate gateway and gate from the yard into a back lane, and also a wicket leading from the yard into the lane. The gate and wicket formed the only access to the yard, except by going through the employer's house,