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look at the subject-matter as well as to the general scope and language of the provisions of the later Act in order to ascertain the meaning of the legislature. I do not collect, from the language of this Act, that there was any intention to alter the description of the *persons* who were to vote, but rather conclude that the object was, to deal with their *qualification ;* and, if so important an alteration of the personal qualification was intended to be made as to extend the franchise to women, who did not then enjoy it, and were in fact excluded from it by the terms of the former Act, I can hardly suppose that the legislature would have made it by using the term 'man'."

" The application of the Act, 13 & 14 Vict. c. 21, contended for by the appellant is," said Willes, J. (p. 387), " a strained one. It is not easy to conceive that the framer of that Act; when he used the word 'expressly' meant to suggest that what is necessarily or properly implied by language is not expressed by such language. It is quite clear that whatever the language used necessarily or even naturally implies is expressed thereby. Still less did the framer of the Act intend to exclude the rule alike of good sense and grammar and law, that general words are to be restrained to the subject-matter with which the speaker or writer is dealing."

" The legislature up to the passing of the Act of 1867, was " Willes, J. said further (p. 388), " unquestionably dealing with qualifications to vote of men in the sense of male persons, and was providing what should entitle such individuals of mankind to vote at parliamentary elections : and, without going through the Act of 1867, I may say that there is nothing, unless it be the section now in question, to shew that the intention of the legislature was ever diverted from the question what should be the qualification entitling male persons to vote, to the question whether the personal incapacity of other persons to vote should be removed. The Act throughout is dealing, not with the capacity of individuals, but with their qualification."

" It further appears to me that the Lord Chief Justice is right in holding that, assuming Brougham's Act to apply, it would not have worked the change that is desired in favour of women, because the Act of 1867 does 'expressly' in every sense exclude persons under a legal incapacity, and women are under a legal incapacity to vote at elections."

" It is impossible to suppose," said Byles J. (p. 393), " that Parliament, while dealing with qualification, and qualification only, by the variation of a phrase, (which at the least *may* convey the same meaning as its predecessor in the Reform Act), intended to admit to the poll another half of the population."

12. A more recent decision of importance, decided by the House of Lords in 1908, is that of *Nairn* v. *University of St. Andrews* [1909] A.C. 147.