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CHAPTER I

INTRODUCTION: THE FIRST CENTURY OF
ENGLISH LAW IN IRELAND

IRELAND was the scene of the first of those extensions which have helped to make the common law one of the principal legal traditions of the world. The men who from 1169 crossed the Irish Sea brought with them their customary law, as they brought their accustomed speech. The author of the *chanson de geste* which commemorates their coming does not tell us that, when

Esteit herberge la tere
E de chastels e de cites,
De dunguns e de fermetes.
Ki ben est aracinez
Les gentils vassals aloses,¹

a pattern of seignorial courts was likewise established; yet it must have been so. Those years of territorial expansion of English law were in addition years in which it was developing in ways which, under royal guidance, tended to make it truly a law common to all the realm. A conscious, efficient and uniform introduction to Ireland of English law, thus developed and developing, had to wait upon the establishment of an adequate organization to govern the lordship which Henry II gave to his son John in 1177. Before the end of the twelfth century, indeed, the authority of the lord of Ireland found expression in the rudiments of later Irish administration.² But the placing of English law and legal institutions upon a firm basis in Ireland is attributed to King John after his accession had united the lordship to the English crown.

As early as 1204 John authorized his justiciar in Ireland to issue five of the most needed original writs—right, mort d’ancestor, novel disseisin, *de fugitivis et nativis* and *de divisis faciendis*—and

¹ ‘The country was planted with castles and with cities, with keeps and with strongholds; thus the noble renowned vassals were well-rooted’: *Song of Dermot and the Earl*, ed. G. H. Orpen (Oxford, 1892), ll. 3203–7.

² H. G. Richardson, ‘Norman Ireland in 1212’, *J.H.S.* III (1942), 144–58, at p. 149.

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

2 ENGLISH LAW IN IRELAND 1290-1324

set the limitations to be observed.¹ On his visit in 1210, according to the chronicler Roger of Wendover, John *fecit quoque ibidem constituere leges et consuetudines Anglicanas*.² A council was held at Dublin at which the magnates of the lordship and, probably, some native rulers swore to English law and this formal acknowledgment was followed by the issue of a charter, no text of which survives.³ Those who governed in the minority of Henry III continued his father's policy in these matters. The Great Charter, as issued on 12 November 1216, was sent to Ireland in the following year.⁴ In 1222, procedure on the writ *de divisio faciendis* and the limitation of mort d'ancestor were brought into line with English practice.⁵

The second justiciarship of Geoffrey Marsh (1226-8) was especially marked by measures to strengthen English law in Ireland. Within days of his appointment, Geoffrey was ordered, on 29 June 1226, to keep and cause to be kept the laws and customs of England, as enjoined by King John.⁶ On 8 July, he was instructed to see that certain assizes were held in the manner customary since John came *ad leges et consuetudines Anglicanas assidendas*.⁷ In December of the same year the application of the curtesy of England to Ireland was stressed and a month later English practice with regard to contumacious excommunicated persons enjoined.⁸ In November 1227 perhaps the most important practical step towards uniformity of law was taken: a register of

¹ *Rot. litt. pat.* p. 47; *Rot. liberate*, pp. 105-6. The two writs last named are apparently *de nativo habendo* and *de rationabilibus divisio*.

² *Flores historiarum* (Rolls ser.), II, 56.

³ The principal official allusions are found in letters of Henry III in 1226, 1228 and 1233 (*Patent rolls*, 1225-32, p. 96; *Close rolls*, 1227-31, p. 45; *Cal. pat. rolls*, 1232-47, p. 31); they are discussed by H. G. Richardson and G. O. Sayles, *The Irish parliament in the middle ages* (Philadelphia, 1952), p. 12, n. 11.

⁴ *Patent rolls*, 1216-25, p. 31. Ireland and the Great Charter is a vexed question with an extensive historiography. A. G. Donaldson has an excellent discussion in an unfortunately unpublished thesis (Ph.D., Q.U.B. 1952), 'The application in Ireland of English and British legislation made before 1801', pp. 48-59. The leading case in modern Irish law is *Little v. Cooper* [1937] I.R. 1. Cf. also H. G. Richardson, 'Magna Carta Hiberniae', *I.H.S.* III (1942), 31-3.

⁵ *Rot. litt. claus.* 1204-24, p. 497 (but cf. *ibid.* p. 532 and pp. 173-4, below); *Patent rolls*, 1216-25, p. 336.

⁶ *Patent rolls*, 1216-25, p. 48.

⁷ *Rot. litt. claus.* 1224-7, p. 128.

⁸ *Ibid.* p. 166; *Patent rolls*, 1225-32, p. 96.

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

INTRODUCTION

3

writs was dispatched for use in Ireland.¹ Some months after Geoffrey left office his successor, Richard de Burgh, was ordered (8 May 1228) to summon the magnates and tenants of Ireland and read to them King John's charter of 1210 concerning the law of England.² In March 1229 a particular case was made the occasion of enjoining the rule, necessary in justification of the *casus regis*, that a younger son inherits before the son of his deceased elder brother.³

Early in the justiciarship of Maurice fitz Gerald (1232-45) English practice was ordered to be followed in regard to the writ of bounds and pleas of advowson.⁴ The years 1236 to 1238 are especially notable in the extension of English law. The statute of Merton was sent to Ireland, the doing of homage by co-parceners regulated, and the writ of escheat through bastardy transmitted.⁵ The maintenance of conformity in the law and practice of the lordship was again particularly stressed under the justiciar John fitz Geoffrey (1245-56). He had not been many weeks in Ireland when the principle was reiterated (9 September 1246) in letters patent which stated that the king

vult quod omnia brevia de communi jure que currunt in Anglia similiter currant in Hibernia.⁶

This may well bear out the suggestion of the late G. J. Turner that when John fitz Geoffrey became justiciar a formulary of writs and pleadings was provided for his use, which may have become the basis of the collection known as *Brevia placitata*.⁷ It is noteworthy that at a later time some Irish prelates blamed John fitz Geoffrey for having taken away what they claimed to be ancient liberties of the church—meaning, no doubt, that he

¹ F. W. Maitland, 'The introduction of English law into Ireland', *E.H.R.* iv (1889), 516-17 (*Collected papers*, ed. H. A. L. Fisher [Cambridge, 1911], II, 81-3); 'History of the register of original writs', 3 *Harvard Law Rev.* pp. 97-115, 167-79, 212-25 (*Select essays in Anglo-American legal history* [Boston, 1907-9], II, 549-96, and *Collected papers*, II, 110-73).

² *Close rolls, 1227-31*, p. 45.

³ *Ibid.* p. 236.

⁴ *Cal. pat. rolls, 1232-47*, p. 31; *Close rolls, 1234-7*, p. 157.

⁵ *Close rolls, 1234-7*, pp. 353-5 (cf. p. 501 and *Cal. pat. rolls, 1232-47*, pp. 176-7), 376-7 and 1237-42, p. 123.

⁶ *Foedera* (Rec. comm. ed.), I, I, 266. A new seal was evidently sent to Ireland for his use.

⁷ *Brevia placitata*, ed. G. J. Turner (S.S. LXVI), pp. xxvi-ix.

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

4 ENGLISH LAW IN IRELAND 1290-1324

sought to conform Irish to English practice in such matters.¹ The need to standardize writs was again emphasized in letters of 1254 and 1257, arising out of particular cases:

volumus quod brevia nostra que placitari debent in Hibernia sint in eadem forma concepta et confecta qua et [*sic*] brevia nostra que [*?*] placitantur in Anglia.²

In the latter part of the century uniformity of law became a question of applying the great new statutes to Ireland, rather than of reiterating the traditional rules of common law, by then adequately inculcated in the lordship. The application of these statutes to Ireland raises one of the most contested topics of Irish legal and constitutional controversy over the centuries—was any form of ratification in Ireland required before English statutes bound the lordship?³ An authoritative recent view is that ‘English legislation was, in principle, applicable to Ireland’.⁴ Alone of the great thirteenth-century statutes, however, the Statute of Merchants (1285) contained an express provision applying it to Ireland. The preamble to the Statute of Westminster II (1285) declared that the king’s *populus Anglicanus et Hibernicus* had profited by the remedies contained in the Statute of Gloucester (1278). Amongst the earliest surviving legislation of an Irish parliament (1278) there is a clause which implies some deliberation upon the question of English statutes, though the text is now disappointingly defective:

En droit de les estatuz de Engleterre à tenir en ceste tere n’en est mie . . . par . . . hauz hommes.⁵

¹ Lambeth Library MS 619, f. 206 r (printed by M. P. Sheehy, ‘English law in medieval Ireland’, *Archiv. Hib.* xxiii (1960), pp. 167–75, at p. 175).

² *Close rolls, 1253–4*, p. 114 (P.R.O., C. 54, no. 67, m. 13 d), and 1256–9, p. 120.

³ Rival seventeenth-century pamphlets of importance are: Anon. [attributed to R. Bolton and also to P. Darcy], ‘A declaration setting forth how, and by what means, the laws and statutes of England came to be of force in Ireland’, and S. Mayart, ‘The answer of Sir Samuel Mayart . . . to a book entitled, *A declaration . . . [as before]*’, both in W. Harris, *Hibernica* (Dublin, 1770), part 2, pp. 9–231. There are useful comments in ch. II (‘Irish patriotism and British imperialism’) of R. L. Schuyler, *Parliament and the British Empire* (New York, 1929), pp. 40–101. The best modern discussion—unhappily unpublished—is in Donaldson, ‘Application of English legislation’, pp. 318–75; some of the points made are accessible in his *Some comparative aspects of Irish law* (Durham, N.C. 1957) and in *Statutes revised: Northern Ireland*, 1, p. lxxxix.

⁴ Richardson and Sayles, *The Irish parliament*, p. 92.

⁵ *Ibid.* p. 292.

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

INTRODUCTION

5

At all events, the statutes of Westminster I, Gloucester, Merchants and Westminster II were given to a clerk of the then justiciar on 14 September 1285 *in Hiberniam deferenda et ibidem proclamanda et observanda*.¹ Here there is adaptation of the ordinary procedure of communication of statutes to suit the administrative special case of Ireland, but there is no suggestion of any need for ratification in that country.² Similarly, the so-called Statute of Money of 1284 was ordered to be enforced in Ireland in 1289.³ Curiously, although both the statute of Rhuddlan (1284) and that of Mortmain (1279) were entered in the Red Book of the Irish exchequer, probably begun under Edward I, neither was mentioned in the list sent over in 1285.⁴ By its nature as exchequer provisions the Statute of Rhuddlan hardly called for the type of publication which was then employed, but the application of the statute of Mortmain to Ireland is a more difficult problem, which will be discussed in a later chapter. The application of the statute of Marlborough (1267) to Ireland in this period has been questioned.⁵ But, although there is no evidence of express extension, there is sufficient evidence of user to dispel the doubt. The writ of entry in the *post* given by the statute (c. 29) was used in the Dublin bench in 1278, and in 1286, in the course of proceedings upon such a writ, reference was made to the publication of the statute in Ireland.⁶ In general, however, the paucity of the surviving evidence makes detailed study of the application of English statutes in Ireland impossible until after 1290. The most that can be said is that formal extension and publication, as in 1285, was one means of application, which may also have occurred in cases of which no record of the circumstances survives, and that user without formal transmission took place to an extent that cannot be accurately assessed.

¹ *Stat. Ire., John-Hen. V*, p. 46.

² On the publication of statutes in general, H. G. Richardson and G. O. Sayles, 'The early statutes', 50 *L.Q.R.* (1934), pp. 201-23, 540-71, at pp. 545-6.

³ H. G. Richardson, *The English Jewry under Angevin kings* (Jewish Hist. Soc. 1960), p. 221.

⁴ *Stat. Ire., John-Hen. V*, pp. 36-45.

⁵ By J. Mills in his introduction to *C.ŷ.R. 1305-7*, p. iii.

⁶ C.P., 6 Edw. I, in P.R.O.I., RC. 8/1, *Cal. mem. rolls*, I, 26, 58, 63; P.R.O., K.B. 27/124, m. 8 (*Cal. doc. Ire. 1285-92*, 666). In 1295, c. 23 (*monstravit de compoto*) was employed in the Dublin bench: C.P., M. 23-4 Edw. I, in P.R.O.I., *Cal. plea rolls*, III, 380. This evidence is in addition to arguments adduced to the same effect by Donaldson: 'Application of English legislation', pp. 75-6.

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

6 ENGLISH LAW IN IRELAND 1290-1324

We may now turn to the early history of the principal courts which administered English law in Ireland. First in importance among them was that which grew around the person of the representative of the lord of Ireland.

The justiciar Meiler fitz Henry (?1198-1200 and 1200-8) had evidently enjoyed a jurisdiction in civil pleas before general powers to hold pleas of the crown were conferred on him in 1207.¹ The oath to be administered to Maurice fitz Gerald when he took office in 1232 included

quod justiciam faciet cuilibet de regno secundum legale posse suum et legalem scientiam suam, secundum consuetudines regni.²

It is clear that, as well as exercising original jurisdiction, both civil and criminal, the justiciar was capable of hearing cases brought in various ways before him from other courts, but the failure of any justiciary rolls of earlier date than 1295 to survive to modern times makes it impossible to say much more of the nature of his judicial business before then. The *curia regis Hibernie*, mentioned in 1199, was apparently before the justiciar.³ There is one reference, in 1230, to proceedings as *coram rege in curia sua apud Dublin*.⁴ But this is an isolated instance of a style that was not regularly adopted until the presence of Richard II had, for a brief time, made it literally accurate.⁵ From 1233 '*coram* [the justiciar of the day]' becomes the usual description of proceedings, though the earliest full heading of pleas to survive comes from nearly half-a-century later:

Placita corone coram Roberto de Dofford capitali justiciario apud Dublin' in octabis sancti Martini anno regni regis Edwardi sexto.⁶

As we shall see, a permanent judicial assistant to the justiciar was appointed towards the end of the century and the justiciar's court then emerges with a distinct personnel.⁷

¹ *Rot. chart.* p. 98; *Rot. litt. pat.* p. 76 and cf. p. 80.

² *Close rolls, 1231-4*, p. 103.

³ *Rot. oblati*, p. 36; cf. *Rot. litt. pat.* pp. 45, 56.

⁴ *Close rolls, 1227-31*, p. 453.

⁵ *Ire. rec. comm. rep. 1816-20*, pp. 101-3 (headings of rolls now destroyed).

⁶ *Close rolls, 1231-4*, p. 293, and *1242-7*, pp. 253-4; *Chartularies of St Mary's abbey, Dublin* (Rolls ser.), I, 1.

⁷ Chapter III, below; for the special case of Roger Huscarl in 1222-3, H. G. Richardson and G. O. Sayles, *The administration of medieval Ireland* (Irish MSS. Comm. 1963), pp. 33-4.

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

INTRODUCTION

7

For the greater part of the thirteenth century the itinerant justices at work in Ireland formed a judiciary only later differentiated into separate courts. There are references to these justices under John.¹ In March 1221, as there was only one regular justice itinerant, and consequently only one, uncontrolled, roll, two more justices, a knight and a clerk, were appointed to sit with him, each to have his roll.² In the eyre of Waterford at Easter 1228 the justiciar presided, with two itinerant justices, and the activity of these justices is amply attested in the succeeding years.³

The emergence of a common bench sedentary at Dublin seems to have occurred about the middle of the century through differentiation of function in the itinerant court rather than, initially, of personnel.⁴ From 1236, phrases such as *coram justic' nostris in curia Dublin'* occur, which may or may not refer to such a court.⁵ The first seemingly unambiguous reference comes in 1248: *coram justic' regis in banco Dublin'*.⁶ Similar references are found in 1251 and 1255.⁷ The pipe roll of 45 Henry III refers to estreats of the bench of the forty-third and forty-fifth years.⁸ The first reference to an individual justice as *in banco* is in an *inspeximus* of 1262, but no other is found until 1273.⁹ The first reference to

¹ *Rot. litt. pat.* p. 76; *Irish pipe roll, 14 John* (supplement to *Ulster Jn. of archaeology*, 3rd ser. IV), p. 18; *Chartae, privilegia et immunitates* (Ir. rec. comm.), p. 14.

² *Rot. litt. claus. 1204-24*, p. 451. Richardson and Sayles, *Administration*, p. 30, take the view that what happened in 1221 was merely a prohibition of justices sitting alone, rather than an addition to the judiciary; but it seems likely that both elements were present in some degree.

³ *Close rolls, 1227-31*, pp. 60-1; many references will be found in *Cal. doc. Ire. 1171-1251*, after this date.

⁴ Cf. Richardson and Sayles, *Administration*, pp. 32-3, where the emergence is put by 1240, but the early evidence is not wholly compelling.

⁵ *Close rolls, 1234-7*, p. 393; *1237-42*, p. 113 (*justic' Hibernie*); *1247-51*, p. 102 (*justic' Dublin'*). Care must be taken with the printed text of the close rolls as the editors seem invariably to have expanded *justic'* as *justiciarii* even where [*capitalis*] *justiciarius* is a more probable meaning: e.g. *Close rolls, 1234-7*, pp. 435, 535. All the references in this and the succeeding note have been verified against the originals and the meaning and correct expansion concluded from the context.

⁶ *Close rolls, 1247-51*, p. 116.

⁷ *Ibid. 1251-3*, p. 179; 'Rôle Gascon de lettres closes, 1254-5' (ed. C. Bémont, in *Bulletin philologique et historique, 1915*), no. 13.

⁸ R.I.A., MS 12 D 9, ff. 38 (Kildare county, *de banco*), 30 (Dublin county, *justic' de banco*); but cf. also f. 10 (*justic' de banco apud Drochd'*).

⁹ *Calendar of archbishop Alen's register*, ed. C. McNeill (R.S.A.I. 1950), p. 96; *Cal. pat. rolls, 1272-81*, p. 3 (*Cal. doc. Ire. 1252-84, 947*). In the context *in banco* is plainly equivalent to *de banco*, meaning 'of the bench', rather than 'in court'.

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978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

8 ENGLISH LAW IN IRELAND 1290-1324

a chief justice of the bench is in the pipe roll of 46 Henry III.¹ On the other hand, mention was made in 1255 of proceedings as *in curia nostra coram justic' nostris itinerantibus apud Dublin*.² A list of justices, chiefly drawn from final concords, for the years 1248 to 1269 is revealing. They are invariably described as *justiciarii itinerantes*. They are almost always mentioned in the same order and the composition of the court is strikingly constant. The same three justices were at Limerick in Trinity term, 1251, as at Dublin in the following Easter term, and pairs of them differently combined appear again at Limerick in Trinity 1252 (for crown as well as common pleas) and Michaelmas 1253.³ An eyre of Cork *ad omnia placita* in 1260 shows two regular justices at work with two others, one of whom appears regularly at a somewhat later time. At Limerick in 1261 and 1267 the courts were almost identical with those found at Dublin about the same time. The court evidently settled more and more at Dublin, however, so that itineration came to hold a secondary place among the activities of the justices. Between 1252 and 1269 no final concord survives made at Dublin in any term from which there is one made elsewhere. Probably sessions were suspended at Dublin when most of the justices itinerated, as was the practice in the English bench somewhat earlier in rather similar circumstances.⁴ But it is to be observed that the same justice might be at Dublin for part of a term and itinerate in another part.⁵

In 1274 Robert Bagod was appointed chief justice of the bench in terms which make it clear that he was to go on *iter* as well as presiding in the court at Dublin:

¹ *P.R.I. rep. D.K. 35*, p. 43 (Tipperary county). Presumably Walrand of Wellesley is meant: cf. Appendix I, below. But the roll has now been destroyed and the English calendar may represent a misunderstanding of *capitalis justiciarius*, meaning the justiciar. Cf. 'Sheriff's account of the honor of Dungarvan . . . 1261-3' (ed. E. Curtis, *R.I.A. Proc.* xxxix, 1-17), p. 9 (Waterford county, 46 Hen. III), and 'Sheriff's account for county Tipperary, 1275-6', (ed. Curtis, *ibid.* xlii, 65-95), p. 85 (Limerick).

² *Close rolls, 1254-6*, p. 374; of course, an eyre *ad omnia placita* is possibly in question.

³ The evidence will be found tabulated in Appendix I, 'The Justices Itinerant, 1248 to 1269'.

⁴ C. A. F. Meekings, *Crown pleas of the Wiltshire Eyre, 1249* (Devizes, 1961), p. 2.

⁵ A fine was made before Alexander of Nottingham in the quinzaine of Michaelmas 1267, at Dublin, but the morrow of All Souls found him at Cashel; *Reg. St Thomas, Dublin* (Rolls ser.), p. 100; P.R.O., K.B. 27/92, m. 7 (*Cal. doc. Ire. 1285-92*, 58).

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978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

INTRODUCTION

9

sciatis quod constituimus . . . Robertum Bagod capitalem justiciarium nostrum ad placita nostra in banco nostro Dublin' tenenda et ad itinerandum ad communia placita in terra nostra predicta . . .¹

He remained in office for over twenty years. A heading of pleas in the bench (*coram Roberto Bagod et sociis suis justiciariis de banco D[ublíne]*) survives from 1276.² It appears that by the eighties itinerant activities were coming to an end and the English pattern was being more precisely followed, so that the justices of the bench remained permanently at Dublin. In 1284 Robert Bagod personally was relieved of the obligation to itinerate,³ while in 1288 a writ recited *cum itinera justiciariorum in partibus Hibernie ob certas causas in presenti se non habeant ut solebant*.⁴ The earliest of the rolls of the bench that survived until the virtual destruction of the Public Record Office of Ireland and its contents in 1922 came from 1278 and 1280–2.⁵ They do not suggest that the justices were engaged on itinerant activities of the kind encountered earlier. Attendance on the justiciar remained a claim on their services, however. About 1280, there is reference to *aukum des justices del Baunk ki la chef justice acumpaignont a luy a cele assise prendre*.⁶ In 1284 or 1285 the sending of some records summoned to England was delayed by the absence of Robert Bagod in Munster with the justiciar, and in 1287 similar circumstances led to other difficulties.⁷

At all events, by 1290 the bench consisted of Robert Bagod, at a fee of forty pounds a year, and several puisne judges at fees ranging between twenty pounds and fifty marks. The earliest

¹ *Foedera* (Rec. comm. ed.), I, II, 518. *Communia placita* need not exclude pleas of the crown: cf. C. A. F. Meekings, *List of rolls and writs of the court coram rege* (MS. in P.R.O. literary search-room), p. 19; Sayles, *Select cases in K.B.* IV, p. xxxii. *Placita nostra* presents a difficulty. In this context, it can scarcely mean either *placita corone* or *proprie cause regis*: cf. Sayles, *ibid.*

² C.P., P. 18 Edw. I, m. 9.

³ *Cal. pat. rolls, 1281–92*, p. 119.

⁴ Cole, *Documents*, p. 84.

⁵ Appendix VI, below. Ten of the twenty-one membranes calendared as C.P., 6 Edw. I, in P.R.O.I., RC. 8/1, *Cal. mem. rolls*, I, 1–101, are in fact a record of quite a different kind, being pleas of the crown of, possibly, an eyre of Dublin (or even portion of a justiciary roll): cf. Richardson and Sayles, *The Irish parliament*, pp. 294–7.

⁶ P.R.O., S.C. 1/30, no. 166.

⁷ P.R.O., S.C. 1/23, no. 146; *Select cases in K.B.*, II, 49. Bagod may perhaps have been frequently away: e.g., for part of Easter term, 1290 (C.P., 18 Edw. I, mm. 10, 10d).

Cambridge University Press

978-0-521-08538-0 - English Law in Ireland, 1290-1324

G. J. Hand

Excerpt

[More information](#)

10 ENGLISH LAW IN IRELAND 1290-1324

plea roll known in modern times, that of 6 Edw. I, reveals the court engaged in hearing the standard actions of thirteenth-century common law: right of land, mort d'ancestor, novel disseisin, and litigation concerning dower provided the bulk of the business. Put another way, of the one hundred and forty or so cases known to have appeared on the roll, there were over seventy pleas relating to land, twenty-six involved questions of marriage, dower, and minors, ten were appeals and trespasses, and eight concerned such matters as advowsons, debts and chattels.¹

Some at least of the sessions in which justices of the bench took part outside Dublin were eyres *ad omnia placita*. Five rolls of such business survived from the reign of Henry III until 1922. Pleas of the crown are known to have been recorded on three of them.² Later, in successive eyres in 1278-9 Richard of Exeter was the principal justice and it is possible that this was a recognized office.³ A little is known of the constitution of the eyre of Tipperary which began on 14 January 1289, when the personnel of the Dublin bench and the itinerant court seem to have become quite distinct. There was no justiciar, strictly speaking, at the time, but the chief governor, the *custos*, Archbishop John of Sandford, attended on the first day and instructed the justices. The chancellor and escheator were also present for part of the eyre. Of the six justices, five are found on eyre at Limerick in the next year.⁴ The destruction of the rolls of the Irish chancery in 1304⁵ reduces our knowledge of special commissions, however, to a few under the English seal.⁶ Such activities as those of justices of gaol delivery are known only from incidental references.⁷

¹ C.P., 6 Edw. I, in P.R.O.I. RC. 8/1, *Cal. mem. rolls*, 1, 23-65.

² Appendix VIII; the crown pleas are found on the rolls for 36 Hen. III, 44 Hen. III and 45 Hen. III (Limerick).

³ Richardson and Sayles, *Administration*, p. 140; cf. p. 41 below.

⁴ *Ibid.* pp. 142-3 and references. J.I., 18 Edw. I (no. 13), in P.R.O., RC. 7/2, *Cal. plea rolls*, II, 139, adds the information that John of Houghton was also on the Limerick eyre.

⁵ *Facsimiles of the national manuscripts of Ireland*, pt. III, pl. III, from destroyed close roll, 2 Edw. II: 'Chronicle of Pembridge', in *Chartul. St Mary's, Dublin*, II, 332; *Annals of Friar Clyn*, ed. R. Butler (Irish arch. soc. 1849), p. 10.

⁶ E.g. *Close rolls, 1251-4*, p. 499; *Cal. pat. rolls, 1281-93*, p. 141 (*Cal. doc. Ire. 1252-84*, 2208).

⁷ E.g. *Cal. close rolls, 1279-88*, p. 214.