

the Governor was sometimes referred to as the Chief Judge. The title of Chief Justice and Justice were appropriated to the members of the Provincial Court and the county courts. Whether the judges dressed in special gowns is not known now. Such special habiliments were considered essential in England during the eighteenth century, and gowns or special coats may have been worn here too. In 1666⁴¹ it was ordered by the Council that every Justice of the Provincial Court should appear for the sittings with his ribbon and medal, and in 1696 again, there was some discussion in the Lower House of the purchase of a gown for the Chief Justice.⁴² There is a portrait of Daniel Dulany, the younger, showing him in a special gown as crown counsel.⁴³ And Griffith, in his *Sketches of the Early History of Maryland*,⁴⁴ says that after the organization of the Court of Appeals in 1695:

The gentlemen of the bar, for whose regulation many acts had been passed since the establishment of the province, were henceforth subjected to examinations before admittance, and judges and lawyers directed to wear gowns in court.

But Griffith's authority for the statement has not been discovered. The councillors would not have given gowns much wear on the Court of Appeals. And such is the case on the issue of gowns before 1776.

There may be some disproportion between so much discussion of the organization and ways of

41. Archives, Proc. Council, 1636 to 1667, 547.

42. Archives, Proc. and Acts Assembly, 1693 to 1696/7, 443, 487.

43. See illustration facing p. 86.

44. Thomas W. Griffith, *Sketches of the Early History of Maryland*, Baltimore, 1821, p. 38.