

ment than the law annexed to the crime when it was committed, is *ex post facto*. *Lynn v. State*, 84 Md. 78.

An act of assembly is not invalid merely because it is retrospective or made applicable to pre-existing cases; such laws are valid unless they impair the obligation of a contract or are *ex post facto* within the meaning of the constitution of the United States or of this article. The act of 1872, chapter 272, repealing and re-enacting article 16, sections 37 and 38, of the Annotated Code, so as to give the court the power in certain cases to prohibit a divorcee from marrying again in the lifetime of the former husband or wife, held not to be an *ex post facto* law, although it was applicable by its terms to cases instituted before the passage of said act—see notes to article 16, sections 37 and 38. *Elliott v. Elliott*, 38 Md. 362. And see *Baugh v. Nelson*, 9 Gill, 299; *State v. Norwood*, 12 Md. 206.

The legislature may release a penalty or forfeiture created by act of assembly for the benefit of a particular county, such releasing act is not an *ex post facto* law. *State v. B. & O. R. R. Co.*, 12 G. & J. 435.

Generally.

The legislature may not change a rule of law so as to give it a retroactive operation, since this would be to take property of one man and give it to another; the legislature may however alter and remodel rules of evidence and remedies. *Thistle v. Frostburg Coal Co.*, 10 Md. 144. And see *Baugh v. Nelson*, 9 Gill, 303; *Wilderman v. Baltimore*, 8 Md. 556.

A repealing ordinance can not destroy or affect any right which was acquired under a prior ordinance before its repeal. *McMechan v. Baltimore*, 2 H. & J. 45.

The legislature may have the power by a retrospective statute to cure mere defects and irregularities in legal proceedings, but not to make a decree or judgment rendered without jurisdiction, valid and binding. *Willis v. Hodson*, 79 Md. 331.

The act of 1860, chapter 271, validating all marriages theretofore celebrated between persons related within certain degrees, held not to violate this article. This article does not prohibit retrospective laws in civil cases. *Harrison v. State*, 22 Md. 491. *Cf. Grove v. Todd*, 41 Md. 644.

Where a deed is defectively acknowledged, and subsequently a curative act is passed, but prior to such passage the grantor dies and his widow's dower thereby vests, the curative act does not bar her dower; the deed is valid, however, as to the grantor and his heirs. The legislature may, in proper cases, by retroactive legislation, cure or confirm conveyances or other proceedings defectively acknowledged or executed; such legislation is sustainable because it is supposed not to operate upon the deed or contract, but upon the mode of proof only. *Grove v. Todd*, 41 Md. 638.

The act of 1890, chapter 187, validating sales made under powers in mortgages between 1860 and 1878 as if the person making the sale had been named in the mortgage and whether such person was a natural person or a corporation, held to operate retrospectively and to apply to a case pending at the date of the passage of said act. *Madigan v. Workingmen's Assn.*, 73 Md. 320.

The registry act of 1865, chapter 174, disfranchising confederate soldiers and providing a test oath, held not to be an *ex post facto* law. The term "*ex post facto*" law defined and limited. *Anderson v. Baker*, 23 Md. 604, 584 and 565.

Art. 18. That no law to attain particular persons of treason or felony, ought to be made in any case, or at any time, hereafter.

The registry act of 1865, chapter 174, disfranchising Confederate soldiers and providing a test oath, held not to be a bill of attainder—see note to article 1, section 1, of the constitution. *Anderson v. Baker*, 23 Md. 604.

Art. 19. That every man, for any injury done to him in his person or property ought to have remedy by the course of the Law of the Land.