

Uncollected alimony payments in the U.S.S.R. are limited by statute to a period of three years. There is no inherent magic in rigidly prescribed limitation periods. Apparently, three years is what the Soviet legislative draftsman would consider to be appropriate balance. By way of Canadian example, *The Limitations of Actions Act*⁹⁸ prescribes a six-year limitation period for normal civil indebtedness. This prescribed limitation period has been followed by the Manitoba courts in the case of separation agreements, where arrears have accrued pursuant to a consensual contractual arrangement of the parties.⁹⁹ However, the Manitoba courts have maintained they have a discretion as to enforcing payment of arrears pursuant to a court order.¹⁰⁰ This has evolved into what has become colloquially known as the "one-year rule" and is based on the practice of the Ecclesiastical Courts of not enforcing alimony arrears beyond one year. Neither the Soviet nor the Manitoba norms (the Manitoba jurisdiction being referred to just by way of example), can be faulted for not complying with justice and reason.

X. CONCLUSION

Hopefully, these comparisons have proven helpful to the reader. The foregoing comparative analysis was not intended to be entirely comprehensive. I have merely endeavoured to point out those disparities and similarities which I considered to be most pertinent and exemplary. Hopefully, this subjectivity has not spilled over into the *critical* analysis of the issues dealt with. I have purposely endeavoured not to treat either the Soviet nor the Western legal system of family law in a pejorative manner. One thing is certain. Both of these systems have much to learn from one another.

98. R.S.M. 1970, c. L50.

99. *Yellowega v. Yellowega* (1969), 66 W.W.R. 241 (Man. Q.B.).

100. *Fiarchuk v. Fiarchuk* (1953), 7 W.W.R. (N.S.) 568 (Man. Q.B.).

