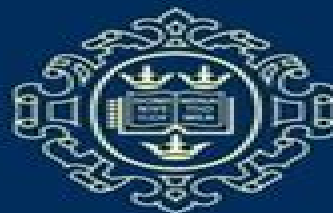

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The Confluence of Public and Private International Law Alex Mills, 2009-07-02 A sharp distinction is usually drawn between public international law concerned with the rights and obligations of states with respect to other states and individuals and private international law concerned with issues of jurisdiction applicable law and the recognition and enforcement of foreign judgments in international private law disputes before national courts Through the adoption of an international systemic perspective Dr Alex Mills challenges this distinction by exploring the ways in which norms of public international law shape and are given effect through private international law Based on an analysis of the history of private international law its role in US EU Australian and Canadian federal constitutional law and its relationship with international constitutional law he rejects its conventional characterisation as purely national law He argues instead that private international law effects an international ordering of regulatory authority in private law structured by international principles of justice pluralism and subsidiarity

General Principles of European Private International Law Stefan Leible, 2016-02-22 European private international law as it stands in the Rome I II and III Regulations and the recent Succession Regulation presents manifold risks of diverging judgments despite seemingly harmonised conflict of law rules There is now a real danger in light of the rapid increase in the number of legal instruments of the European Union on conflict of laws that European private international law will become incoherent This collection of essays by twenty noted scholars in the field sheds clear light on the pivotal issues of whether a set of overarching rules a general part is required whether an EU regulation is the adequate legal instrument for such a purpose which general questions such an instrument should address and what solutions such an instrument should provide In analysing the possible emergence of general principles in European private international law over the past years the contributors discuss such

issues and factors as the following the relationship between conflict of laws and recognition the room for party autonomy the concept of habitual residence adaptation when interplay between different laws leads to deadlock public policy exceptions the desirability of a general escape clause the classic topics of characterisation incidental question and renvoi and right to appeal in case of errors in the application of foreign law Practitioners dealing with these notoriously difficult cases will welcome this in depth treatment of the issues as will interested policymakers throughout the EU Member States and at the EU level itself Scholars will discover an incomparable comparative analysis leading to expert recommendations in European private international law opening the way to an effective European framework in this area **Landmark Cases in Private**

International Law William Day, Louise Merrett, 2023-05-18 This collection of essays contains in depth analyses of eighteen landmark cases in private international law from Penn v Lord Baltimore in 1750 to Brownlie v FS Cairo Nile Plaza LLC in 2021 The contributors are experts drawn from academia and practice as well as from the bench Case law has been a central driver in the legal development of the English conflict of laws Judge made law does not just supply a source of law itself but also acts as the crucible in which other sources of law legislation international Treaty European regulation and ideas generated by jurists such as Joseph Story and Albert Venn Dicey have been tested and applied This book sheds new light on the past and future evolution of private international law by focusing on the landmark cases which have fundamentally shaped the way that we think about this subject The focus is on the English common law but landmarks in Scotland Australia and Canada are covered as well Many of them concern disputes between commercial parties others deal with issues such as marriage and domicile and some arise from controversies in political constitutional and international affairs The landmark cases tackled in this collection address significant issues in civil jurisdiction governing law foreign judgments and public policy The essays place those landmarks in their historical context explain their contemporary importance and consider their future relevance Private International Law in Israel Talia Einhorn, 2022-09-20 Derived from the renowned multi volume

International Encyclopaedia of Laws this book provides ready access to the law applied to cases involving cross border issues in Israel It offers every lawyer dealing with questions of conflict of laws much needed access to these conflict rules presented clearly and concisely by a local expert Beginning with a general introduction the monograph goes on to discuss the choice of law technique sources of private international law and the relevant connection with other laws Then follows clear description and analysis of the rules of choice of law on natural and legal persons contractual and non contractual obligations movable and immovable property intangible property rights company law family law marriage cohabitation registered partnerships matrimonial property maintenance child law and succession law including testamentary dispositions The presentation concludes with an overview of relevant civil procedure examining lex fori and issues of national and international jurisdiction acceptability and enforcement of foreign judgements and international arbitration Its succinct yet scholarly nature as well as the practical quality of the information it provides make this book a valuable resource for lawyers handling cases in Israel

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