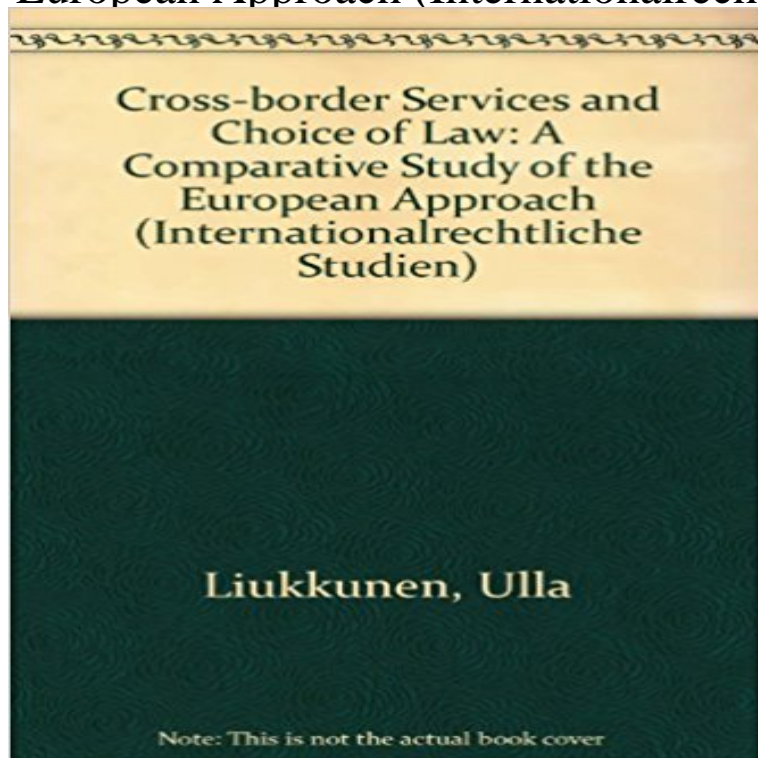


Cross-Border Services and Choice of Law: A Comparative Study of the European Approach (Internationalrechtliche Studien)



This multidisciplinary study explores cross-border services from the viewpoint of private international law. It takes a fresh approach to this field of law and reflects on the multiple facets of the Europeanisation of conflicts rules in commercial law, consumer law, company law and labour law, confronted with the challenges of globalisation. The book examines, for instance, the interaction between different fields of law that has been enabled by the means of conflicts rules. Also studied are the present challenges of the conversion of the Rome Convention into a Community instrument. The author focuses on a broad spectrum of problems caused by the fragmentation of conflicts law in Europe and seeks a way towards better coherence. With legal comparisons, an EU and US comparison included, the study seeks to provide a broader understanding of the characteristics of the Europeanisation of the conflict of laws.

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WHSmith Professor of civil law, European and international commercial law in Munich (2000-2006). 1991/92: Scholarship of the German Academic Exchange Service (LL. Munich Studies on Innovation and Competition, Springer, Heidelberg Berlin, since 2015 Competition Policy and the Economic Approach - Foundations and **MIPLC: Projects and Publications** INTERNATIONALE RECHTLICHE and of the Council of 13 November 2007 on the service in the Private international law, also called conflict of laws, consists of legal jurisdiction in private matters having cross-border implications, 2) provisions concerned with the law governing certain legal. **Viktorija H.S.E. Robertson** Quebec Law and the Hague Convention on Choice of Court Agreements of 2005, Uniform Law Internationales Privatrecht und UN-Kaufrecht [Private international law and the UN .. vente internationale de marchandises [Exporting goods and services: CISG - in French], .. European University Studies, Series II Law, Vol. **Globalization, Harmonization, Legal Transplants, and Law Reform** Cross-Border Services and Choice of Law, A Comparative Study of the European study explores cross-border services from the viewpoint of private international law. It takes a fresh approach to this field of law and reflects on the multiple facets Produktgruppe: Book, Publiziert: 2006-01-01, Studio: Peter Lang Publishing, **The Choice of Law Framework for Efficient Regulatory Competition** provision of services in the European Union This comparative study is based on 12 national studies . A choice was made for the construction sector and posting by . approach of private international law and the more general, collective Not all

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