

The Further Consequences of a Choice of Law? *Trafigura Beheer v Kookmin Bank*

Adrian Briggs (Oxford University) has written a note on "**The further consequences of a choice of law?**" in the forthcoming issue of the *Law Quarterly Review* (L.Q.R. 2007, 123(Jan), 18-21). The note:

Comments on the three Commercial Court decisions in Trafigura Beheer BV v Kookmin Bank Co on a dispute arising when a Korean company which had issued a letter of credit to a Dutch company in respect of the sale of a cargo of oil brought proceedings in Korea alleging a breach of duty by the Dutch company regarding the failure to pass on the bills of lading. Discusses the Dutch company's application to restrain the Korean proceedings, and the questions whether the claim in tort arising out of the parties' contractual relationship was governed by English or Korean law, and whether the Korean company's behaviour was vexatious.