Frank Bates, Professor of Law at the University of Newcastle (New South Wales), has a short article entitled ‘Stay Proceedings and Forum Non Conveniens in Recent Australian Family Law’ at (2008) 57(3) International and Comparative Law Quarterly 649. The article discusses the decision of the Full Court of the Family Court of Australia in Kwon v Lee [2006] FamCA 730; (2006) FLC 93-287, which considered the interaction between the Australian common law test for *forum non conveniens* applications (whether the forum is clearly inappropriate) and the legislative requirement that, in deciding whether to make a parenting order in relation to a child, the Family Court must regard the best interests of the child as the paramount consideration.