Kühn on Imbalance in Joint and Several Debt in Private International Law

Anna-Lisa Kühn has authored a book on the imbalance in joint and several debt in private international law ("Die gestörte Gesamtschuld im Internationalen Privatrecht. Am Beispiel einer Spaltung des Mehrpersonenverhältnisses zwischen deutschem und englischem Recht"). The book is written in German and has been published by Mohr Siebeck.

The abstract reads as follows:

Anna-Lisa Kühn analyzes a situation in which a creditor has a claim against several debtors whose obligations are governed by different legal systems and who would be liable for the same claim could one of them not rely on an exemption from liability, the impact of which is assessed differently by the legal systems involved. She shows how this should be treated under the Rome I and Rome II Regulations.

More information is available here.