

Out now: Yearbook of Private International Law XXI (2019/2020)

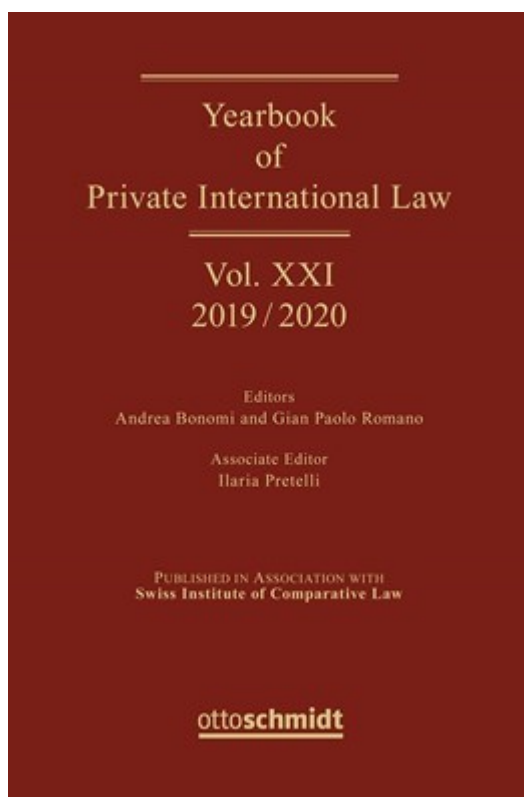


TABLE OF CONTENTS

| | |
|---|------|
| Foreword | xi |
| Abbreviations | xiii |
| Doctrine | |
| Janeen CARRUTHERS | |
| Discerning the Meaning of “Habitual Residence of the Child” in UK Courts - A Case for the Oracle of Delphi | 1 |
| Christian KOHLER | |

The EU Succession Regulation before the German Courts 2016-2019 37

Mihail DANOV

Cross-Border Litigation - New Data, Initial Brexit Implications in

England and Wales and Long-Term Policy Choices 57

Nikitas E. HATZIMIHAİL

On the Doctrinal Beginnings of the Conflict of Laws 101

Interim Measures in International Commercial Litigation

Proceedings of the SICL's 31st Private International Law Day -

Lausanne, 23 May 2019

Andrea BONOMI

Interim Measures at the Crossroads of International Litigation and

Arbitration - Some Remarks on Concurrent Jurisdiction and Cross-

Border Enforcement 137

Alexander LAYTON

Interim Measures in English Law and their Circulation 159

Sandrine GIROUD / Noémie RAETZO

The Recognition and Enforcement of Foreign Interim Measures

in Switzerland 175

Ilaria PRETELLI

The Law Applicable to Provisional and Protective Measures - With

a Focus on the EU System of Ancillary Reliefs 197

Gilles CUNIBERTI

| | |
|---|-----|
| Jurisdiction to Grant Interim Measures in Support of Arbitration - The Influence of European Law | 225 |
|---|-----|

Laurent HIRSCH

| | |
|---|-----|
| Swiss Practice of Interim Relief in International Arbitration | 237 |
|---|-----|

Karim EL CHAZLI / Ahmed HABIB

| | |
|--|-----|
| Interim Measures in International Arbitration - An Arab Perspective | 259 |
|--|-----|

viii

The 2019 Hague Judgments Convention

Matthias WELLER

| | |
|--|-----|
| The Jurisdictional Filters of the HCCH 2019 Judgments Convention | 279 |
|--|-----|

Marko JOVANOVIC

Thou Shall (Not) Pass - Grounds for Refusal of Recognition and

| | |
|---|-----|
| Enforcement under the 2019 Hague Judgments Convention | 309 |
|---|-----|

Lidia SPITZ

Refusal of Recognition and Enforcement of Foreign Judgments on

Public Policy Grounds in the Hague Judgments Convention -

| | |
|--|-----|
| A Comparison with The 1958 New York Convention | 333 |
|--|-----|

Cristina M. MARIOTTINI

Establishment of Treaty Relations under The 2019 Hague Judgments

| | |
|------------------|-----|
| Convention | 365 |
|------------------|-----|

National Reports

Yitshak COHEN

| | |
|---|-----|
| International Jurisdiction of the Rabbinical Courts in Claims for Divorce in Israel | 381 |
| Florence GUILLAUME | |
| The Connecting Factor of the Place of Celebration of Marriage in Swiss Private International Law | 399 |
| Yin LIU | |
| Recognition of Foreign Same-Sex Unions in China | 425 |
| Richard Frimpong OPPONG / Sam TECLE | |
| The <i>lex loci delicti</i> Rule in Canadian Conflict of Laws | 457 |
| Eduardo PICAND ALBÓNICO | |
| Law of Succession to Estates of Deceased Persons in Chilean Private International Law | 489 |

Court Decision

| | |
|---|-----|
| Wolfgang FABER | |
| Foreign Proprietary Security Rights Failing to Comply with National Publicity Standards to Be Accepted? On Case No. 3 OB 249/18S of the Austrian Supreme Court of Justice | 509 |

ix

Forum

| | |
|---|--|
| Pascal FAVROD-COUNE | |
| The Legal Position of the Weaker Party in B2B Relationships with Online Platforms in the European Union - An Analysis of Dispute | |

| | |
|---|-----|
| Resolution Mechanisms in Regulation (EU) 2019/1150..... | 523 |
| Maria Chiara MARULLO | |
| “Almost” Universal Jurisdiction | 549 |
| Adeline MICHOU | |
| Public Policy Exceptions in U.S. and European Private International Law - An Ultimate Fortress for Social and Environmental Standards? | 569 |
| Chukwuma Samuel Adesina OKOLI | |
| Choice of Law in The European Union - Common Law Procedure and Evidence | 589 |
| Sven RIVA | |
| Decentralized Autonomous Organizations (DAOs) in the Swiss Legal Order | 601 |
| Cassius Jean SOSSOU BIADJA | |
| Bridging the Gap in the OHADA Treaty with Respect to the Interpretative Role of the CCJA in Arbitration Matters | 639 |
| Index | 663 |