

Crossroads in Private International Law Seminar Series, University of Aberdeen

In April, the Aberdeen Centre for Private International Law and Transnational Governance will be relaunching its *Crossroads in Private International Law* research seminar series. It will feature both online and hybrid events.



Crossroads *in* Private International Law

seminar series

23 April – 21 May 2025

Centre for Private International Law
and Transnational Governance

For the upcoming term, six events have been scheduled:

23 April 2025 at 14:00 (UK time) | **“Choice of Laws Revisited: Is it Time to Reintroduce Justice into the Rules?”** by Prof Sharon Shakargy (The Hebrew University of Jerusalem) | online and in-person

In 1933, Professor David Cavers argued for rethinking the choice of law process by prioritizing justice and party expectations over formal rules, sparking the American choice of law revolution. While this movement had some lasting impacts, it ultimately was mostly unsuccessful. Nearly 90 years later, the issue of justice in conflict of laws remains relevant, especially regarding power disparities between major tech companies and consumers. This paper calls for a renewed focus on justice within this context, outlining its implications for the existing legal framework.

24 April 2025 at 14:00 (UK time) | **“Collisions and Autonomous Ships: A Challenge for the Collision Convention 1910”** by Ms Luci Carey (University of Aberdeen) | online only

The introduction of Maritime Autonomous Surface Ships (MASS) whereby human crews are replaced by AI driven navigation systems raises novel legal questions. One of these relates to the liability of the vessel in the event of a collision. The International Convention for the Unification of Certain Rules of Law with respect to Collisions between Vessels 1910 (1910 Collision Convention) apportions liability between colliding ships based upon the degree of fault. The introduction of artificial intelligence is making the determination of fault or liability in negligence increasingly difficult. This seminar questions whether fault-based liability for collisions involving ships navigated without human control is appropriate, enquires if strict liability is the logical solution or if the 1910 Collision Convention is robust in its current form to accommodate technological developments.

30 April 2025 at 12:00 (UK time) | **“A Skewed Bargain? Platforms get the King’s Protection for little or no Obedience or Allegiance”** by Prof Uta Kohl (University of Southampton) | online only

Common law jurisprudence on civil jurisdiction over non-resident defendants has occasionally made explicit reference to the justification of jurisdiction as formulated in Calvin’s Case (1608): ‘when an alien in amity cometh into England,

because so long as he is within England he is within the King's protection; therefore so long as he is here he oweth unto the King a local obedience or ligeance, for the one (as it hath been said), draweth the other.' This justification is powerful in so far as it demonstrates that territorially based jurisdiction (in civil and criminal cases) is one side of a two sided bargain: obedience and allegiance in exchange for protection. In this talk I will reflect on how this bargain has played out – or not played out – in the case of online platforms, and on how we might use Calvin's Case to fundamentally rethink the treatment of platforms.

7 May 2025 at 11:00 (UK time) | **“Should the Rules on Recognition and Enforcement of Foreign Judgments in Civil and Commercial Matters Be Harmonised in Africa? A Comparative and Empirical Assessment”** by Dr Chukwuma Okoli (University of Birmingham) | online only

This study examines 200 decided cases from 18 African legal systems, focusing on the recognition and enforcement of foreign judgments in civil and commercial matters. It reveals significant disparities in outcomes and grounds for recognition and enforcement and refusal. It underscores the diversity of legal frameworks, procedural rules, and judicial interpretations across the continent. The findings highlight the challenges posed by this fragmentation and make a strong case for harmonisation. A more unified approach, the study argues, would not only streamline cross-border legal processes but also foster economic development and strengthen investor confidence across Africa.

14 May 2025 at 14:00 (UK time) | **“Navigating Generative AI, Copyright Protection, and Private International Law in Europe”** by Dr Michiel Poesen (University of Aberdeen) | online and in-person

Generative AI has an intellectual property problem. This seminar enquires whether the current framework of private international law in the European Union is fit to deal with cross-border copyright infringement litigation concerning (i) the use of copyrighted work to train and develop GenAI and (ii) AI-generated content (AIGC) which resembles protected work.

21 May 2025 at 10:00 (UK time) | **“Platform Governance and Wikilegality”** by Prof David Nelken (UCL) (Joint seminar with the Aberdeen Centre for Constitutional and Public International Law) | online and in-person

Registration for all events is possible [here](#).