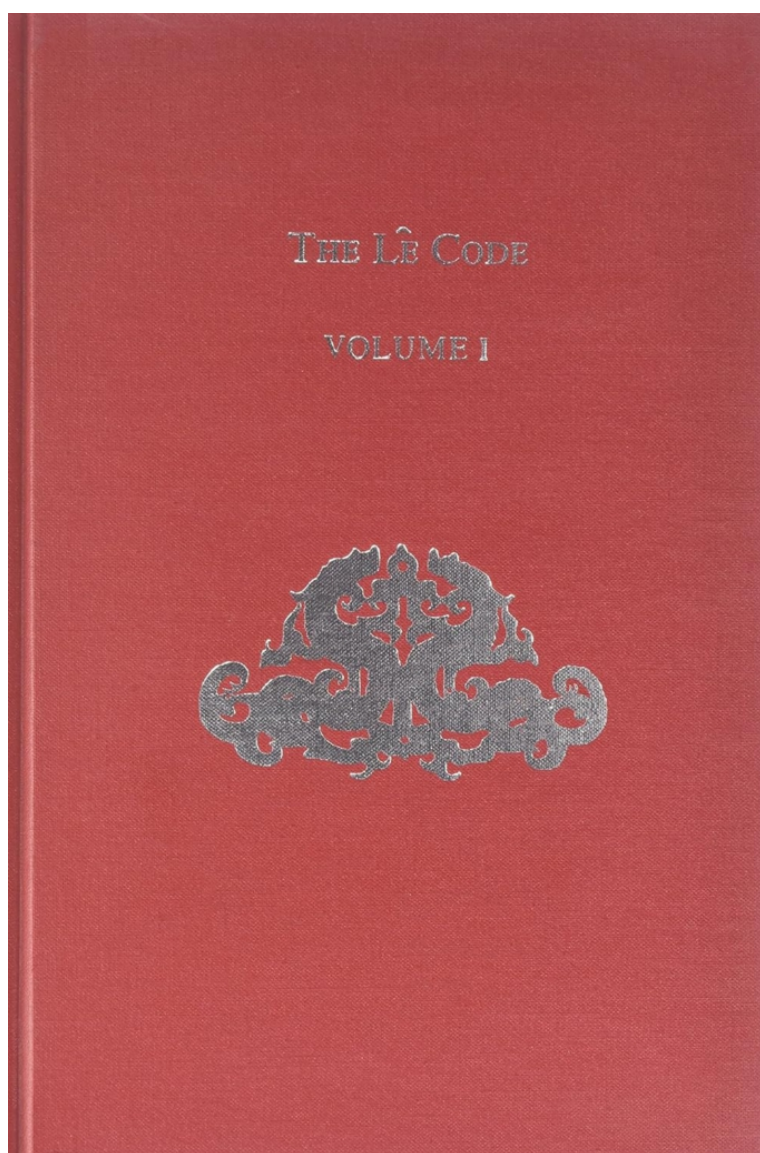


Asian Conflict of Laws avant la lettre? Thảo Anh Hoàng, Early conflict-of-laws rules: Vietnam's Lê Code (1483) in East Asian and global contexts



For those (like myself) who view private international law as we know it today as essentially a European invention of the 19th century it is fascinating to see examples of earlier and non-European regimes. One example is Article 48 (on 'Infringements between peoples outside civilization') of the Tang Code (653 CE) which reads:

For the people outside [our] civilisation, if infringements occur between those of the same kind, they will be judged by their customary law. If they are of different kinds, then the law [of our empire] shall be applied.

諸化外人, 同類自相犯者, 各依本俗法; 異類相犯者, 以法律論

There has long been a debate of whether this is a true conflicts rule, much of which rests on how broadly to define what conflict of laws actually is and presupposes (for earlier discussion see, e.g. Qingkun Xu, *The Codification of Conflicts Law in China: A Long Way to Go*, 65 *Am. J. Comp. L.* 919, 925-6 (2017) with references). Thảo Anh Hoàng (Huế University, Vietnam), in a new article, sides with those who view this as a true conflict of laws rule and also discusses its reception and application in Vietnam and elsewhere in Asia. (Thảo Anh Hoàng, *Early conflict-of-laws rules: Vietnam's Lê Code (1483) in East Asian and global contexts*, 14 *Comp. Leg. Hist.* 29-54(2026). In addition, she provides a fascinating and enlightening discussion of the risks of applying modern concepts to ancient phenomena that is instructive to everyone interested in private international law beyond its black letters. Based on parts of her doctoral thesis currently being written at Montpellier under the supervision of Carine Becharef Jallamion, the article is a tribute to both the productive potential of comparison beyond Europe and North America, and the promising young researchers from Asia.

Thảo Anh Hoàng, *Early conflict-of-laws rules: Vietnam's Lê Code (1483) in East Asian and global contexts*, 14 *Comp. Leg. Hist.* 29-54 (2026).