Record Nr. UNINA9910451414803321 Autore Ziegel Jacob S. Titolo Comparative consumer insolvency regimes: a Canadian perspective / Jacob S. Ziegel Oxford; Portland, Oregon,: Hart Publishing, 2003 Pubbl/distr/stampa **ISBN** 1-4725-5946-0 1-280-80055-0 9786610800551 1-84731-139-3 Edizione [1st ed.] Descrizione fisica 1 online resource (212 p.) 343.71037 Disciplina 346.71073 Soggetti Bankruptcy Bankruptcy - Canada Consumer credit - Law and legislation Consumer credit - Law and legislation - Canada Electronic books. Lingua di pubblicazione Inglese **Formato** Materiale a stampa Livello bibliografico Monografia Note generali Description based upon print version of record. Includes bibliographical references (pages [169]-180) and index Nota di bibliografia Part A Introduction -- 1 Purpose of Study -- Part B Country Surveys 11 Nota di contenuto -- 2 Canada -- 3 United States -- 4 Australia -- 5 England and Wales -- 6 Scotland -- 7 Scandinavia and Continental Countries of Western Europe -- Part C Assessing the Various Insolvency Regimes and Suggestions for Changes -- 8 Assessment and Suggestions for Changes All modern legal systems with advanced economies must address the Sommario/riassunto question of how to respond to the needs of insolvent consumers whose burden of debt greatly exceeds their capacity to repay within a reasonable time frame. This study surveys comparatively the insolvency regimes currently in place or likely to be adopted in the foreseeable future in Canada, the United States, Australia, England and Wales, Scotland, Scandinavia and a representative group of Western countries

on the continent of Europe. Modern legal systems have two basic

alternatives in providing relief for over-committed consumers. The first, which involves restricting the enforcement of individual creditor remedies is a method with which this study is not concerned. Where the consumer is seriously insolvent and owes money to many creditors, a different approach is required -- a collective solution to debtor's problems - and this, the solution provided by modern insolvency systems, is the focus of this study