Record Nr. UNINA9910464085703321 Autore Brand Ronald A Titolo Transaction planning using rules on jurisdiction and the recognition and enforcement of judgments / / Ronald A. Brand [The Hague]:,: Hague Academy of International Law,, 2014 Pubbl/distr/stampa **ISBN** 90-04-26811-1 1 online resource (359 pages): illustrations Descrizione fisica Collana AIL-pocket 347.077 Disciplina Conflict of laws - Commercial law - United States Soggetti Conflict of laws - Commercial law - European Union countries Conflict of laws - Jurisdiction - United States Conflict of laws - Jurisdiction - European Union countries Judgments, Foreign - United States Judgments, Foreign - European Union countries Judicial assistance - United States Judicial assistance - European Union countries Electronic books. Lingua di pubblicazione Inglese **Formato** Materiale a stampa Livello bibliografico Monografia "Full text of the lecture published in December 2013 in the Recueil des Note generali cours, vol. 358"--Leaf opposite series title page. Nota di bibliografia Includes bibliographical references. Nota di contenuto Transaction planning and private international law -- Understanding rules of adjudicatory jurisdiction across legal systems -- Understanding legal system differences ain rules on the recognition and enforcement of foreign judgments -- Party autonomy and transaction planning --Consumer protection and private international law -- Revisiting jurisdictional issues: tort jurisdiction and transaction planning --Drafting effective choice of forum agreements. Private international law is normally discussed in terms of rules applied Sommario/riassunto in litigation involving parties from more than one State. Those same rules are fundamentally important, however, to those who plan crossborder commercial transactions with a desire to avoid having a dispute arise — or at least to place a party in the best position possible if a dispute does arise. This makes rules regarding jurisdiction, applicable law, and the recognition and enforcement of judgments

vitally important to contract negotiations. It also makes the consideration of transactional interests important when developing new rules of private international law. These lectures examine rules of jurisdiction and rules of recognition and enforcement of judgments in the United States and the European Union, considering their similarities, their differences, and how they affect the transaction planning process.