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Nota di contenuto	; Introduction: Security rights in movable property wihtin the common market and the approach of the study / Eva-Maria Kieninger -- A labyrinth of creditors : a short introduction to the history of security interests in goods / Willem J. Zwarte -- Security in movables in the United States : Uniform Commercial Code Article 9 : a basis for comparison / Harry C. Sigman -- The English law of security : creditor-friendly but unreformed / Michael Bridge -- The European Bank For Reconstruction and Development's secured transactions project : a model law and ten core principles for a modern secured transactions law in countries of Central and Eastern Europe (and elsewhere!) / Frederique Dahan and John Simpson -- ; The case studies -- Evaluation : a common core? : convergences, subsisting differences and possible ways for harmonisation / Eva-Maria Kieninger.

Sommario/riassunto

For every transnational lawyer, it is vital to know the differences between national secured transactions laws. Since the applicable law is determined by the place where the collateral is situated, it may change when movables are brought from one state to another. Introductory essays from comparative lawyers set the scene. The book then presents a survey of the law relating to secured transactions in the member states of the European Union. Following the Common Core approach, the national reports are centred around fifteen hypothetical cases dealing with the most important issues of secured transactions law, such as the creation of security rights in different business situations, the relationship between debtor and secured creditor, the nature of the creditor's rights and their enforcement as against third parties. each case is followed by a comparative summary. A general report evaluates the possibilities of European harmonisation in the field of secured transactions law.
