Record Nr. UNINA9910796402103321 Autore Jon Woo-Jung <1976-> **Titolo** Cross-border transfer and collateralisation of receivables: a comparative analysis of multiple legal systems / / Woo-jung Jon Portland, Oregon:,: Hart Publishing,, 2018 Pubbl/distr/stampa 1-5099-1437-4 **ISBN** 1-5099-1435-8 Descrizione fisica 1 online resource Collana Studies in private international law Disciplina 343.08/7 Soggetti Accounts receivable Conflict of laws - Security Negotiable instruments **Payments** Security (Law) Transfer (Law) Lingua di pubblicazione Inglese **Formato** Materiale a stampa Livello bibliografico Monografia Includes bibliographical references and index. Nota di bibliografia Nota di contenuto 1. Introduction -- 2. Security Rights Registries -- 3. Transfers of and Security Rights in Receivables -- 4. Conflicts of Laws and Technical Issues of the Debtor-Indexed Registration System -- 5. The International Receivables Registry -- 6. Priority in the International Receivables Registry -- 7. Conclusion Legal systems around the world vary widely in terms of how they deal Sommario/riassunto with the transfer of and security interests in receivables. The aim of this book is to help international financiers and lawyers in relevant markets in their practice of international receivables financing. Substantively, this book analyses three types of receivables financing transactions, ie outright transfer, security transfer and security interests. This book covers comprehensive comparison and analysis of the laws on the transfer of and security interests in receivables of fifteen major jurisdictions, encompassing common law jurisdictions, Roman-Germanic jurisdictions and French-Napoleonic jurisdictions, as well as

relevant EU Directives. To be more specific, this book compares and analyses the relevant legal systems of the US, Canada, New Zealand,

Australia, Korea, Japan, France, Belgium, England, Hong Kong, Singapore, China, Germany, Austria and the Netherlands. Furthermore, in order to analyse those legal systems from the international perspective, this book compares relevant international conventions; it also proposes to establish an international registration system for the transfer of and security interests in receivables