

1. Record Nr.	UNINA9910822605403321
Titolo	CISG vs. regional sales law unification : with a focus on the new Common European Sales Law // edited by Ulrich Magnus
Pubbl/distr/stampa	Munich, : Sellier European Law Publishers, c2012
ISBN	3-86653-966-5
Edizione	[1st ed.]
Descrizione fisica	1 online resource (248 p.)
Altri autori (Persone)	MagnusUlrich <1944->
Disciplina	340
Soggetti	Conflict of laws - Sales Export sales contracts Law - International unification Sales - European Union countries
Lingua di pubblicazione	Inglese
Formato	Materiale a stampa
Livello bibliografico	Monografia
Note generali	Description based upon print version of record.
Nota di bibliografia	Includes bibliographical references.
Nota di contenuto	Front matter -- Foreword -- List of Contributors -- Table of Contents -- Introduction / Magnus, Ulrich -- The U.S. Experience with the UCC and the CISG: Some Insights for the Proposed CESL? / Flechtner, Harry M. -- The Curious Case of Transborder Sales Law: A Comparative Analysis of CESL, CISG, and the UCC / DiMatteo, Larry A. -- The CISG and the Common Law: the Australian Experience / Zeller, Bruno -- CISG and OHADA Sales Law. Or the Relationship between Global and Regional Sales Law / Ferrari, Franco -- CISG vs. CESL / Magnus, Ulrich -- CISG, CESL, PICC and PECL / Koch, Robert -- Concluding Remarks / Magnus, Ulrich -- Proposal for a Regulation of the European Parliament and of the Council on a Common European Sales Law
Sommario/riassunto	In October 2011, the European Commission introduced its Proposal for a Regulation on a Common European Sales Law (CESL) which covers inter alia international business sales - a subject already regulated by the Convention of International Sale of Goods (CISG) which was ratified by 78 member states. How does this new Proposal fit the existing uniform sales law? How have other regions of the world managed the coexistence of global and regional sales law unification? What can Europe learn from the U.S. experience concerning the CISG and the Uniform Commercial Code? What can we learn from the African OHADA

which made CISG more or less the internal law of 17 African states, what from Australia where CISG and common law exist alongside? All these questions are intensely discussed in this highly recommendable book written by renowned authors like Larry DiMatteo, Harry Flechtner, Franco Ferrari, Robert Koch, Ulrich Magnus and Bruno Zeller.
