

TABLE OF CONTENTS

| | |
|--|-----|
| Foreword | ix |
| Abbreviations | xi |
| | |
| Doctrine | |
| Gérald GOLDSTEIN | |
| <i>Forum Non Conveniens</i> and Exception Clauses – Coordinating Conflicting Legal Systems in Civil Law Jurisdictions in a Global Context | 1 |
| Georgina GARRIGA SUAU | |
| The Law Applicable to the Right of Recourse in the Field of Liability Insurance Law..... | 31 |
| Matthias LEHMANN / Johannes UNGERER | |
| Applying or Taking Account of Foreign Overriding Mandatory Provisions – Sophism under the Rome I Regulation | 53 |
| Qisheng HE / Yahan WANG | |
| Resolving the Dilemma of Judgment Reciprocity – From a Sino-Japanese Model to a Sino-Singaporean Model | 83 |
| Johannes LANDBRECHT | |
| Uniform Jurisdiction Rules under the Hague Choice of Court Convention..... | 109 |
| | |
| Matrimonial Property Regimes in European Private International Law | |
| Anatol DUTTA | |
| Beyond Husband and Wife – New Couple Regimes and the European Matrimonial Property Regulations..... | 145 |
| Pietro FRANZINA | |
| Jurisdiction in Matters Relating to Property Regimes under EU Private International Law | 159 |
| Dagmar COESTER-WALTJEN | |
| Connecting Factors to Determine the Law Applicable to Matrimonial Property Regimes..... | 195 |
| Patrick WAUTELET | |
| What’s Wrong with Article 22? The Unsolved Mysteries of Choice of Law for Matrimonial Property | 213 |
| Sandrine CLAVEL / Fabienne JAULT-SESEKE | |
| Public Interest Considerations – Changes in Continuity..... | 233 |

Cultural Property and Private International Law

- Marc-André RENOLD
Legal Obstacles to Claims for the Restitution of Looted Art..... 247
- Alessandro CHECHI
When Private International Law Meets Cultural Heritage Law –
Problems and Prospects 269

National Reports

- Maria Caterina BARUFFI
International Surrogacy Arrangements Test the Public Policy
Exception – An Italian Perspective..... 295
- Maria HOOK
New Zealand’s Choice of Law Rules Relating to Tort 313
- Tamas DEZSO ZIEGLER / Vanda VADASZ / Sarolta SZABÓ
The New Hungarian Private International Law Code – A Mixture of
Modern and Traditional Solutions 333
- Zeynep Derya TARMAN / Meltem Ece OBA
Choice of Court Agreements under Turkish Law 365
- Tamir BOLDBAATAR
The Development of Private International Law in Mongolia 395
- Oleg ZAYTSEV / Vladimir ZAYTSEV
The Russian Implementation of the Hague Children Conventions..... 421

News from the Hague

- María Blanca NOODT TAQUELA / Verónica RUIZ ABOU-NIGM
The Draft Judgments Convention and its Relationship with Other
International Instruments 449
- Cristina M. MARIOTTINI
The Exclusion of Defamation and Privacy from the Scope of
The Hague Draft Convention on Judgments..... 475

Court Decisions

- Guillaume KESSLER
Recognition of International Surrogacy in France –
The Bypass Strategy 487
- Michael KOMUCZKY
Punitive Damages and Public Policy in the EU 509

Forum

Seema PANNAIKADAVIL-THOMAS / Vito BUMBACA
The Role of International Social Services in Private International Law 531

Ioannis K. SOMARAKIS
Rethinking EU Jurisdiction in Cross-Border Family and Succession
Cases Connected with Non-Member States..... 555

Giulia VALLAR
International Insolvency in the Banking Sector – Coordination Issues
and Private International Law Methods 585

Index 611