YEARBOOK OF PRIVATE INTERNATIONAL LAW
VOLUME XV – 2013 / 2014

FOUNDING EDITORS
PETAR ŠARČEVIĆ †
PAUL VOLKEN

EDITORS
ANDREA BONOMI
Professor at the
University of Lausanne

GIAN PAOLO ROMANO
Professor at the
University of Geneva

PUBLISHED IN ASSOCIATION WITH
SWISS INSTITUTE OF COMPARATIVE LAW
LAUSANNE, SWITZERLAND

sellier european law publishers
# TABLE OF CONTENTS

**Foreword** 
.......................................................... xi

**Abbreviations** ............................................. xiii

**Doctrine**

Paul LAGARDE  
The Movement of Civil-Status Records in Europe, and the European Commission’s Proposal of 24 April 2013 .................................................. 1

Christian KOHLER  
Towards the Recognition of Civil Status in the European Union .......... 13

**WORKING GROUP OF THE FEDERAL ASSOCIATION OF GERMAN CIVIL STATUS REGISTRARS**  
One Name Throughout Europe – Draft for a European Regulation on the Law Applicable to Names .......................................................... 31

Patrick KINSCH  
*Harroudj v. France*: Indications from the European Court of Human Rights on the Nature of Choice of Law Rules and on Their Potentially Discriminatory Effect ........................................... 39

Jan L. NEELS  
The Nature, Objective and Purposes of the Hague Principles on Choice of Law in International Contracts .................................................. 45

Benedetta UBERTAZZI  
Private International Law before the International Court of Justice ........ 57

**The Brussels I-bis Regulation and Future Perspectives**

Fabrizio MARONGIU BUONAIUTI  
*Lis alibi pendens* and Related Actions in the Relationships with the Courts of Third Countries in the Recast of the Brussels I Regulation ...... 87

Ilaria QUEIROLO  
Choice of Court Agreements in the New Brussels I-bis Regulation: A Critical Appraisal .......................................................... 113

Dorothee SCHRAMM  
Enforcement and the Abolition of Exequatur under the 2012 Brussels I Regulation .......................................................... 143
Franccsco SEATZU

Luigi MARI / Ilaria PRETELLI
Possibility and Terms for Applying the Brussels I Regulation (Recast) to Extra-EU Disputes – Excerpts of the Study PE 493.024 by the Swiss Institute of Comparative Law .................................................. 211

Recognition and Enforcement of Foreign Decisions in Non-EU Jurisdictions

Sirko HARDER
Recognition and Enforcement of Foreign Judgments in Australia .......... 255

Gérald GOLDSTEIN
The Recognition and Enforcement of Foreign Decisions in Québec ...... 291

Geneviève SAUMIER
Recognition and Enforcement of Foreign Judgments in the Canadian Common Law Provinces ......................................................... 313

Wenliang ZHANG
Recognition of Foreign Judgments in China: The Essentials and Strategies .......................................................... 319

Song LU / Kun FAN
The Recognition and Enforcement of Foreign Judgments in Hong Kong ............................................................. 349

Richard Frimpong OPPONG
Recognition and Enforcement of Foreign Judgments in Commonwealth African Countries ..................................................... 365

Karim EL CHAZLI
Recognition and Enforcement of Foreign Decisions in Egypt ............. 387

Yasuhiro OKUDA
Recognition and Enforcement of Foreign Judgments in Japan ............ 411

Kwang Hyun SUK
Recognition and Enforcement of Foreign Judgments in the Republic of Korea ........................................................ 421

Anna GRISHCHENKOVA
Recognition and Enforcement of Foreign Judgments in Russia – Recent Trends ......................................................... 439

Tiong Min YEO
Recognition and Enforcement of Foreign Judgments in Singapore ...... 451
Paul BÄDER / Thalia KRUGER
The Recognition and Enforcement of Foreign Judgments in South Africa.......................... 467

Ceyda SÜRAL / Zeynap Derya TARMAN
Recognition and Enforcement of Foreign Court Decisions in Turkey.............................. 485

National Reports
Aida GUGU BUSHATI
The Albanian Private International Law of 2011.......................................................... 509

Court Decisions
Raffaella DlIORIO
Latest Developments in the ECJ Case Law on Jurisdiction Concerning Consumer Contracts.......................................................... 529

Forum
Valérie PARISOT
Internal Conflicts of Laws .................................................................................. 541

Valentin RÉTORNAY
International Cooperation in Bankruptcy: It Is Time to Lift the Swiss Isolation ................ 573

Index ................................................................................................................. 609