

Contents

Foreword Kevin Arquit, Simpson Thacher & Bartlett LLP, Jacques Buhart, Herbert Smith LLP	v
Analysis Dr Alan Riley, Reader in Private Law, City Law School, City University, London	vii
Australia Ezekiel Solomon and Fiona Crosbie, Allens Arthur Robinson	1
Austria Dr Rainer Roniger, Dr Astrid Ablasser-Neuhuber, Haarmann Hügel Rechtsanwälte OEG	7
Belgium Kris Van Hove and Martin Favart, Van Bael & Bellis	13
Canada Peter L Glossop, Graham Reynolds QC, Osler, Hoskin & Harcourt LLP	21
European Union Jean-François Bellis, Martin Favart, Van Bael & Bellis	39
Finland Christian Wik and Inga Korpinen, Roschier Holmberg	43
France Dominique Brault and Estelle Jégou, Herbert Smith LLP	51
Germany Dr Matthias Karl and Dr Ingo Brinker, Gleiss Lutz	59
Ireland Dr Vincent Power, A&L Goodbody	69
Italy Alberto Pera, Gianni, Origoni, Grippo & Partners	81
Japan Hideto Ishida, James M Minamoto, Anderson Mōri & Tomotsune	89
Korea Kyung Taek Jung, Han Woo Park, Michael Yu, Kim & Chang	99
Poland Agnieszka Stefanowicz-Baranska, Salans	109
South Africa Anthony Norton, Webber Wentzel Bowens	119
Sweden Kent Karlsson and Pontus Bergsten, Linklaters Advokatbyrå	125
Switzerland Dr Franz Hoffet and Dr Marcel Dietrich, Homburger Rechtsanwälte	135
United Kingdom Stephen Wisking and Morag Bond, Herbert Smith LLP	147
United States Kevin Arquit, Simpson Thacher & Bartlett LLP	167
Contact details	181
Index	185