# Table of Contents

List of Editor and Contributors \hspace{1cm} v

Preface \hspace{1cm} xxix

**CHAPTER 1**  
Mainland China  
*Yongping Xiao & Wenwen Liang* \hspace{1cm} 1

$§1.01$ Codification of Private International Law and Relevance of Case Law  \hspace{1cm} 1  
[A] Codification and Case Law  \hspace{1cm} 1  
[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules  \hspace{1cm} 3

$§1.02$ Jurisdiction of Local Courts in Foreign-Related Cases  \hspace{1cm} 3  
[A] Grounds for Jurisdiction  \hspace{1cm} 4  
[1] General  \hspace{1cm} 4  
[a] Jurisdiction by Level  \hspace{1cm} 4  
[b] Territorial Jurisdiction  \hspace{1cm} 5  
[2] Submitted to Jurisdiction  \hspace{1cm} 6  
[3] Exclusive Jurisdiction  \hspace{1cm} 6  
[B] Exclusion of Jurisdiction  \hspace{1cm} 6  
[1] Immunity  \hspace{1cm} 6  
[a] Sovereign Immunity  \hspace{1cm} 6  
[b] Diplomatic and Consular Immunity  \hspace{1cm} 8  
[c] Other Immunities  \hspace{1cm} 8  
[2] Forum Agreements in Favour of Foreign Courts  \hspace{1cm} 8  
[3] Arbitration Clause  \hspace{1cm} 9  
[C] Non-exercise of Jurisdiction  \hspace{1cm} 9  
[1] Forum Non Conveniens  \hspace{1cm} 9  
[2] *Lis alibi pendens*  \hspace{1cm} 10
Table of Contents

§1.03 Applicable Law 11
   [A] Choice of Law 11
      [1] Express Stipulation 11
      [2] Implied Choice 13
   [B] Other Cases 13
      [1] Civil Subjects 13
      [3] Succession 15
      [4] Rights In Rem 16
      [5] Contractual Obligations 16
      [6] Torts 18
      [8] Incidental Questions 19
   [C] Renvoi 20
   [D] Mandatory Rules of the Forum and of Third States 20
      [1] Public Policy 20
   [E] Proof of Foreign Law 21
   [F] Evasion of the Law 23

§1.04 Procedural Issues 23
   [A] Service of Summons and Judicial Orders Abroad 23
   [B] Obtaining Evidence Abroad 25
   [C] Restraint of Foreign Proceedings 26
   [D] Proof of Foreign Public Documents 26
   [E] Statute of Limitations 27
   [F] Remedies and Damages 27
   [G] Foreign Currency Obligations 27
   [H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 27

§1.05 Recognition and Enforcement of Foreign Decisions 29
   [B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 31

§1.06 Treaties for Judicial Cooperation 31

CHAPTER 2
Hong Kong
Alan Gibb & Richard Morris 33

§2.01 Codification of Private International Law and Relevance of Case Law 33
   [A] Codification and Case Law 33
   [B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 34
§2.02 Jurisdiction of the Local Courts in Foreign-Related Cases 35
[A] Grounds for Jurisdiction 35
[1] General 35
[2] Submitted to Jurisdiction 35
[3] Exclusive Jurisdiction 36
[B] Exclusion of Jurisdiction 36
[1] Immunity 36
[a] Sovereign Immunity 36
[b] Diplomatic and Consular Immunity 36
[2] Non-justiciable Claims 36
[C] Non-exercise of Jurisdiction 38
[1] Forum Non Conveniens 38
[2] Lis alibi pendens 39
§2.03 Applicable Law 39
[A] Choice of Law 39
[1] Express Stipulation 39
[2] Implied Choice 39
[B] Other Cases 40
[C] Renvoi 41
[D] Mandatory Rules of the Forum and of Third States 41
[E] Proof of Foreign Law 42
§2.04 Procedural Issues 43
[A] Service of Summons and Judicial Orders Abroad 43
[B] Obtaining Evidence Abroad 44
[C] Restraint of Foreign Proceedings 44
[D] Proof of Foreign Public Documents 44
[E] Statute of Limitations 45
[F] Remedies and Damages 45
[G] Foreign Currency Obligations 46
[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 46
§2.05 Recognition and Enforcement of Foreign Decisions 46
[A] Judicial Decisions: Requirements and Limitations 46
[1] Common Law Regime 47
[2] Foreign Judgments (Reciprocal Enforcement) Ordinance 48
[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 49
§2.06 Recognition of Other Foreign Public Documents 50
§2.07 Treaties for Judicial Cooperation 51
§3.01 Codification of Private International Law and Relevance of Case Law 53
[A] Codification and Case Law 53
[B] Multilateral Conventions Providing Uniform Substantive Law
and/or International Jurisdictional Rules 54
§3.02 Jurisdiction of Local Courts in Foreign-Related Cases 54
[A] Grounds for Jurisdiction 55
[1] General 55
[2] Exclusive Jurisdiction 55
[B] Exclusion of Jurisdiction 55
[1] Immunity 55
[a] Sovereign Immunity 55
[b] Diplomatic and Consular Immunity 55
[c] Other Immunities 56
[2] Non-justiciable Claims 56
[C] Non-exercise of Jurisdiction 57
[1] Forum Non Conveniens 57
[2] Lis alibi pendens 57
§3.03 Applicable Law 58
[A] Choice of Law 58
[B] Other Cases 59
[C] Renvoï 59
[D] Mandatory Rules of the Forum and of Third States 60
[E] Proof of Foreign Law 61
[F] Evasion of the Law 61
§3.04 Procedural Issues 62
[A] Service of Summons and Judicial Orders Abroad 62
[B] Obtaining Evidence Abroad 62
[C] Restraint of Foreign Proceedings 62
[D] Proof of Foreign Public Documents 63
[E] Statute of Limitations 63
[F] Remedies and Damages 63
[G] Foreign Currency Obligations 64
[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 64
§3.05 Recognition and Enforcement of Foreign Decisions 64
[A] Judicial Decisions: Requirements and Limitations 64
[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 64
§3.06 Recognition of Other Foreign Public Documents 65
§3.07 Treaties for Judicial Cooperation 65

CHAPTER 4
Japan
Naoki Iguchi & Naoko Kamimura 67

§4.01 Codification of Private International Law and Relevance of Case Law 67
[A] Codification and Case Law 67
[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 68

§4.02 Jurisdiction of Local Courts in Foreign-Related Cases 68
[A] Grounds for Jurisdiction 68
[1] General 68
[2] Submitted to Jurisdiction 70
[3] Exclusive Jurisdiction 70
[B] Exclusion of Jurisdiction 71
[1] Immunity 71
[a] Sovereign Immunity 71
[b] Diplomatic and Consular Immunity 71
[c] Other Immunities 71
[3] Arbitration Clause 71
[C] Non-exercise of Jurisdiction 72
[1] Forum Non Conveniens 72
[2] Lis alibi pendens 72

§4.03 Applicable Law 73
[A] Choice of Law 73
[B] Other Cases 74
[1] Contract without Choice of Law - General 74
[a] Consumer Contracts 74
[b] Labour Contracts 75
[3] Rights in Rem, etc. 75
[4] Torts 75
[5] Negotiorum Gestio and Unjust Enrichment 76
[7] Formalities for Contracts 76
[C] Renvoi 77
[D] Mandatory Rules of the Forum and of Third States 77
[E] Proof of Foreign Law 77
[F] Evasion of the Law 77

§4.04 Procedural Issues 77
[A] Service of Summons and Judicial Orders Abroad 77
[3] Persons 97
[4] Legal Actions 98
[5] Real Rights (jura in re or rights in rem) 98
[8] Bills, Notes, and Cheques 99
[9] Maritime Affairs 100
[10] Contractual Assignment of Claims and Assumption of Obligations 100

[C] Renvoi 100
[D] Mandatory Rules of the Forum and of Third States 101
[E] Proof of Foreign Law 101
[F] Evasion of the Law 102

§5.04 Procedural Issues 102
[A] Service of Summons and Judicial Orders Abroad 102
[B] Obtaining Evidence Abroad 103
[C] Restraint of Foreign Proceedings 104
[D] Proof of Foreign Public Documents 104
[E] Statute of Limitations 105
[F] Remedies and Damages 105
[G] Foreign Currency Obligations 106
[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 106

§5.05 Recognition and Enforcement of Foreign Decisions 106
[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 107

§5.06 Recognition of Other Foreign Public Documents 107
§5.07 Treaties for Judicial Cooperation 108

CHAPTER 6
Macau

Jorge Menezes 109

§6.01 Codification of Private International Law and Relevance of Case Law 109
[A] Codification and Case Law 109
[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 110

§6.02 Jurisdiction of Local Courts in Foreign-Related Cases 111
Table of Contents

[A] Grounds for Jurisdiction 111
   [1] General 111
   [2] Exclusive Jurisdiction 112

[B] Exclusion of Jurisdiction 112
   [1] Immunity 112
      [a] Sovereign Immunity 112
      [b] Diplomatic and Consular Immunity 112
      [c] Other Immunities 112
   [3] Arbitration Clause 113

[C] Non-exercise of Jurisdiction 113
   [1] Forum Non Conveniens 113
   [2] *Lis alibi pendens* 113

§6.03 Applicable Law 114

[A] Choice of Law 114
[B] Other Cases 115
   [1] Personal Law 115
   [3] Obligations 116
   [4] Property and Copyright 117
   [6] Succession 118
[C] *Renvoi* 119
[D] Mandatory Rules of the Forum and of Third States 120
[E] Proof of Foreign Law 120
[F] Evasion of the Law 120

§6.04 Procedural Issues 121

[A] Service of Summons and Judicial Orders Abroad 121
   [1] Service Abroad 121
   [2] Service of Foreign Proceedings in Macau 122
[B] Obtaining Evidence Abroad 123
[C] Restraint of Foreign Proceedings 123
[D] Proof of Foreign Public Documents 123
[E] Statute of Limitations 124
[F] Remedies and Damages 124
[G] Foreign Currency Obligations 124
[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 125

§6.05 Recognition and Enforcement of Foreign Decisions 125

[A] Judicial Decisions: Requirements and Limitations 125
[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 127

§6.06 Treaties for Judicial Cooperation 127
### Chapter 7

**Malaysia**

*Effendy Othman*

#### §7.01 Codification of Private International Law and Relevance of Case Law

- **[A] Codification and Case Law**
- **[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules**

#### §7.02 Jurisdiction of Local Courts in Foreign-Related Cases

- **[A] Grounds for Jurisdiction**
  - [1] General
    - [a] In Personam Jurisdiction
    - [b] In Rem Jurisdiction
  - [2] Exclusive Jurisdiction
- **[B] Exclusion of Jurisdiction**
  - [1] Immunity
    - [a] Sovereign Immunity
      - [i] Rulers of the States of Malaysia
      - [ii] Foreign States
    - [b] Diplomatic and Consular Immunity
    - [c] Other Immunities
  - [2] Non-justiciable Claims
- **[C] Non-exercise of Jurisdiction**
  - [1] Forum Non Conveniens
  - [2] *Lis alibi pendens*

#### §7.03 Applicable Law

- **[A] Choice of Law**
  - [1] Express Stipulation
  - [2] Implied Choice
- **[B] Other Cases**
- **[C] Renvoi**
- **[D] Mandatory Rules of the Forum and of Third States**
- **[E] Proof of Foreign Law**
- **[F] Evasion of the Law**

#### §7.04 Procedural Issues

- **[A] Service of Summons and Judicial Orders Abroad**
- **[B] Obtaining Evidence Abroad**
- **[C] Restraint of Foreign Proceedings**
- **[D] Proof of Foreign Public Documents**
- **[E] Statute of Limitations**
- **[F] Remedies and Damages**
- **[G] Foreign Currency Obligations**
Chapter 8

Mongolia

Munkhselenge Purevdorjiin

§8.01 Codification of Private International Law and Relevance of Case Law

[A] Codification and Case Law

[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules

§8.02 Jurisdiction of Local Courts in Foreign-Related Cases

[A] Grounds for Jurisdiction

[1] General

[2] Exclusive Jurisdiction

[B] Exclusion of Jurisdiction

[1] Immunity

[a] Sovereign Immunity

[b] Diplomatic and Consular Immunity

[c] Other Immunities

[2] Non-justiciable Claims


[C] Non-exercise of Jurisdiction

[1] Forum Non Conveniens

[2] Lis alibi pendens

§8.03 Applicable Law

[A] Choice of Law

[1] Express Stipulation

[2] Implied Choice

[B] Other Cases

[1] Property Rights

[2] Form of Legal Transactions

[3] Legal Capacity

[4] Succession

[5] Family

[C] Renvoi

[D] Mandatory Rules of the Forum and of Third States
<table>
<thead>
<tr>
<th>Section</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§8.04</td>
<td><strong>Procedural Issues</strong></td>
<td>152</td>
</tr>
<tr>
<td>[A]</td>
<td>Service of Summons and Judicial Orders Abroad</td>
<td>152</td>
</tr>
<tr>
<td>[B]</td>
<td>Obtaining Evidence Abroad</td>
<td>153</td>
</tr>
<tr>
<td>[C]</td>
<td>Restraint of Foreign Proceedings</td>
<td>153</td>
</tr>
<tr>
<td>[D]</td>
<td>Proof of Foreign Public Documents</td>
<td>153</td>
</tr>
<tr>
<td>[E]</td>
<td>Statute of Limitations</td>
<td>153</td>
</tr>
<tr>
<td>[F]</td>
<td>Remedies and Damages</td>
<td>154</td>
</tr>
<tr>
<td>[G]</td>
<td>Foreign Currency Obligations</td>
<td>154</td>
</tr>
<tr>
<td>§8.05</td>
<td><strong>Recognition and Enforcement of Foreign Decisions</strong></td>
<td>154</td>
</tr>
<tr>
<td>[B]</td>
<td>Arbitral Awards (Including ICSID Awards): Requirements and Limitations</td>
<td>155</td>
</tr>
<tr>
<td>§8.06</td>
<td>Recognition of Other Foreign Public Documents</td>
<td>156</td>
</tr>
<tr>
<td>§8.07</td>
<td>Treaties for Judicial Cooperation</td>
<td>156</td>
</tr>
</tbody>
</table>

**CHAPTER 9**

**Philippines**

*Elizabeth H. Aguiling-Pangalangan*

§9.01 **Codification of Private International Law and Relevance of Case Law** 157

[A] Codification and Case Law 157

[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 158

§9.02 **Jurisdiction of Local Courts in Foreign-Related Cases** 159

[A] Grounds for Jurisdiction 159

[1] General 159

[2] Submitted to Jurisdiction 160


[B] Exclusion of Jurisdiction 160

[1] Immunity 160

[a] Sovereign Immunity 160

[b] Diplomatic and Consular Immunity 161

[c] Other Immunities 161

[2] Forum Agreements in Favour of Foreign Courts 161


[C] Non-exercise of Jurisdiction 164

[1] Forum Non Conveniens 164

[2] Lis alibi pendens 165

§9.03 **Applicable Law** 166

[A] Choice of Law 166
Express Stipulation 166

[2] Implied Choice 167
[B] Other Cases 168
[C] Renvoi 168
[D] Mandatory Rules of the Forum and of Third States 169
[E] Proof of Foreign Law 170

\(\text{§9.04} \) Procedural Issues 172
[A] Service of Summons and Judicial Orders Abroad 172
[B] Obtaining Evidence Abroad 173
[C] Restraint of Foreign Proceedings 174
[D] Proof of Foreign Public Documents 175
[E] Statute of Limitations 177
[F] Remedies and Damages 177
[G] Foreign Currency Obligations 177
[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 178

\(\text{§9.05} \) Recognition and Enforcement of Foreign Decisions 178
[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 180

\(\text{§9.06} \) Treaties for Judicial Cooperation 180

\(\text{CHAPTER 10} \)

Singapore

Harish Kumar & Jonathan Toh 181

\(\text{§10.01} \) Codification of Private International Law and Relevance of Case Law 181
[A] Codification and Case Law 181
[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 181

\(\text{§10.02} \) Jurisdiction of Local Courts in Foreign-Related Cases 182
[A] Grounds for Jurisdiction 182
[1] General 182
[a] In Personam Jurisdiction 182
[b] In Rem Jurisdiction 183
[c] Jurisdiction of the Singapore International Commercial Court 183
[2] Submitted to Jurisdiction 185
[a] Agreement 185
[b] Participation 185
[c] Deemed Submission 186
[3] Exclusive Jurisdiction 186
[B] Exclusion of Jurisdiction 186
[1] Immunity 186
Mareva Injunction in Support of Foreign Judicial Processes

Mareva Injunction in Support of Foreign Arbitral Processes

§10.05 Recognition and Enforcement of Foreign Decisions

[A] Judicial Decisions: Requirements and Limitations

[1] In Personam Judgments

[a] Suing Afresh on the Underlying Cause of Action
[b] Enforcement and Recognition of Judgments

[i] Common Law Action
[ii] Enforcement by Registration
[iii] International Jurisdiction
[iv] Severability

[c] Defences under Private International Law

[2] Recognition of In Rem Judgments

[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations

§10.06 Recognition of Other Foreign Public Documents

§10.07 Treaties for Judicial Cooperation

CHAPTER 11
Taiwan
Yao-Ming Hsu

§11.01 Codification of Private International Law and Relevance of Case Law

[A] Codification and Case Law

[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules

§11.02 Jurisdiction of Local Courts in Foreign-Related Cases

[A] Grounds for Jurisdiction

[1] General
[2] Exclusive Jurisdiction

[B] Exclusion of Jurisdiction

[1] Immunity

[a] Sovereign Immunity
[b] Diplomatic and Consular Immunity
[c] Other Immunities

[2] Non-Justiciable Claims


[C] Non-exercise of Jurisdiction

[1] Forum Non Conveniens
[2] *Lis alibi pendens*
§11.03 Applicable Law 223
[A] Choice of Law 223
[B] Other Cases 224
[C] Renvoi 225
[D] Mandatory Rules of the Forum and of Third States 226
[E] Proof of Foreign Law 226
[F] Evasion of the Law 226

§11.04 Procedural Issues 227
[A] Service of Summons and Judicial Orders Abroad 227
[B] Obtaining Evidence Abroad 228
[C] Restraint of Foreign Proceedings 228
[D] Proof of Foreign Public Documents 228
[E] Statute of Limitations 228
[F] Remedies and Damages 229
[G] Foreign Currency Obligations 229
[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process 229

§11.05 Recognition and Enforcement of Foreign Decisions 229
[A] Judicial Decisions: Requirements and Limitations 229
[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations 230

§11.06 Treaties for Judicial Cooperation 232

CHAPTER 12
Thailand
Chinnawat Thongpackdee & Vanina Sucharitkul 233

§12.01 Codification of Private International Law and Relevance of Case Law 233
[A] Codification and Case Law 233
[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 234

§12.02 Jurisdiction of Local Courts in Foreign-Related Cases 234
[A] Grounds for Jurisdiction 234
[1] General 234
[2] Exclusive Jurisdiction 235
[B] Exclusion of Jurisdiction 235
[1] Immunity 235
[a] Sovereign Immunity 235
[b] Diplomatic and Consular Immunity 235
[c] Other Immunities 236
[2] Non-justiciable Claims 236
[C] Non-exercise of Jurisdiction 237
§12.03 Applicable Law

[A] Choice of Law

[1] Express Stipulation
[2] Implied Choice

[B] Other Cases

[1] Formal Validity
[3] Torts
[4] Property
[5] Law of Nationality
[6] Succession

[C] Renvoi

[D] Mandatory Rules of the Forum and of Third States

[E] Proof of Foreign Law

[F] Evasion of the Law

§12.04 Procedural Issues

[A] Service of Summons and Judicial Orders Abroad

[B] Obtaining Evidence Abroad

[C] Restraint of Foreign Proceedings

[D] Proof of Foreign Public Documents

[E] Statute of Limitations

[F] Remedies and Damages

[G] Foreign Currency Obligations

[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process

§12.05 Recognition and Enforcement of Foreign Decisions

[A] Judicial Decisions: Requirements and Limitations

[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations

§12.06 Recognition of Other Foreign Public Documents

§12.07 Treaties for Judicial Cooperation
[2] Submitted to Jurisdiction 252
[3] Exclusive Jurisdiction 252
[B] Exclusion of Jurisdiction 253
[1] Immunity 253
[a] Sovereign Immunity 253
[b] Diplomatic and Consular Immunity 254
[c] Other Immunities 254
[2] Non-justiciable Claims 254
[C] Non-exercise of Jurisdiction 256
[1] Forum Non Conveniens 256
[2] Lis alibi pendens 256

§13.03 Applicable Law 257
[A] Choice of Law 257
[1] Express Stipulation 257
[2] Implied Choice 257
[B] Other Cases 257
[1] Personal Law 257
[2] Law Governing Legal Transactions 259
[6] Family Relations 261
[7] Successions 263
[C] Renvoi 264
[D] Mandatory Rules of the Forum and of Third States 265
[E] Proof of Foreign Law 266
[F] Evasion of the Law 267

§13.04 Procedural Issues 268
[A] Service of Summons and Judicial Orders Abroad 268
[B] Obtaining Evidence Abroad 268
[C] Restraint of Foreign Proceedings 268
[D] Proof of Foreign Public Documents 268
[E] Statutes of Limitations 269
[F] Remedies and Damages 269
[G] Foreign Currency Obligations 269
[H] Restraining Removal of Assets and Securing Evidence in
Favour of a Foreign Arbitration/Judicial Process 269

§13.05 Recognition and Enforcement of Foreign Decisions 269
[A] Judicial Decisions: Requirements and Limitations 269
[B] Arbitral Awards (Including ICSID Awards): Requirements and
Limitations 271
Table of Contents

§13.06 Recognition of Other Foreign Public Documents 271
§13.07 Treaties for Judicial Cooperation 272

CHAPTER 14
Vietnam
Nguyen Thi Xuan Trinh & Konrad Hull 273

§14.01 Codification of Private International Law and Relevance of Case Law 273
[A] Codification and Case Law 273
[B] Multilateral Conventions Providing Uniform Substantive Law and/or International Jurisdictional Rules 274

§14.02 Jurisdiction of Local Courts in Foreign-Related Cases 274
[A] Grounds for Jurisdiction 274
[1] General 274
[a] Maritime Activities 275
[b] Civil Aviation Activities 275
[2] Exclusive Jurisdiction 276
[B] Exclusion of Jurisdiction 277
[1] Immunity 277
[a] Sovereign Immunity 277
[b] Diplomatic and Consular Immunity 277
[c] Other Immunities 278
[C] Non-exercise of Jurisdiction 279
[1] Forum Non Conveniens 279
[2] Lis alibi pendens 279

§14.03 Applicable Law 279
[A] Choice of Law 279
[1] Express Stipulation 279
[2] Implied Choice 280
[B] Other Cases 280
[1] Civil Subjects 281
[2] Property Rights 281
[3] Succession 282
[4] Contractual Obligations 282
[5] Maritime and Civil Aviation Activities 283
[6] Torts 284
[7] Unilateral Transactions 284
[C] Renvoi 284
[D] Mandatory Rules of the Forum and of Third States 284
[E] Proof of Foreign Law 284
[F] Evasion of the Law 285

xxvi
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>§14.04 Procedural Issues</td>
<td>285</td>
</tr>
<tr>
<td>[A] Service of Summons and Judicial Orders Abroad</td>
<td>285</td>
</tr>
<tr>
<td>[B] Obtaining Evidence Abroad</td>
<td>287</td>
</tr>
<tr>
<td>[C] Restraint of Foreign Proceedings</td>
<td>288</td>
</tr>
<tr>
<td>[D] Proof of Foreign Public Documents</td>
<td>288</td>
</tr>
<tr>
<td>[E] Statute of Limitations</td>
<td>288</td>
</tr>
<tr>
<td>[F] Remedies and Damages</td>
<td>288</td>
</tr>
<tr>
<td>[G] Foreign Currency Obligations</td>
<td>289</td>
</tr>
<tr>
<td>[H] Restraining Removal of Assets and Securing Evidence in Favour of a Foreign Arbitration/Judicial Process</td>
<td>290</td>
</tr>
<tr>
<td>§14.05 Recognition and Enforcement of Foreign Decisions</td>
<td>290</td>
</tr>
<tr>
<td>[A] Judicial Decisions: Requirements and Limitations</td>
<td>290</td>
</tr>
<tr>
<td>[B] Arbitral Awards (Including ICSID Awards): Requirements and Limitations</td>
<td>292</td>
</tr>
<tr>
<td>§14.06 Recognition of Other Foreign Public Documents</td>
<td>293</td>
</tr>
<tr>
<td>§14.07 Treaties for Judicial Cooperation</td>
<td>294</td>
</tr>
<tr>
<td>Index</td>
<td>295</td>
</tr>
</tbody>
</table>