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Title: Szwajcarska regulacja wskazania prawa właściwego dla zobowiązań umownych i jej znaczenie dla prawa Unii Europejskiej/ Swiss choice-of-law rules on the law applicable to contractual obligations and its meaning for the law of the European Union

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Abstract:

The paper outlines rules on the law applicable to contractual obligations established by the Swiss Federal Act on Private International Law of 1987. The Author focuses on following issues: the characteristic performance, dépeçage and the closest connection. Additionally, he analyses the influence of parties legitimate expectations on the determination of the applicable law. These considerations seem to be of undeniable importance for the European legislator and future case-law concerning the Rome I Regulation.