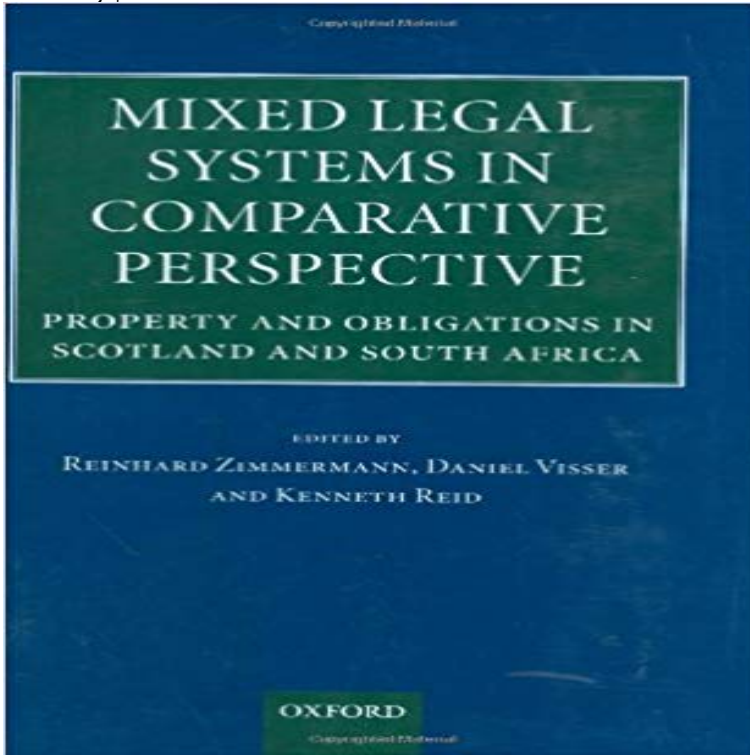


Mixed Legal Systems in Comparative Perspective: Property and Obligations in Scotland and South Africa



Scotland and South Africa are two of the leading jurisdictions which integrate English common law with Continental civil law. This volume examines their experience and considers the sider lessons both for mixed legal systems and for the development of a European private law.

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