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Comparative Law of Security and Guarantees xv CONTENTS Chapter 1 18 Defaults and enforcement of ship and aircraft mortgages Generally Events of default Restrictions on events of default Enforcement remedies: summary Express enforcement remedies Sale Possession Arrest jurisdiction

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research, being social security comparison and social security law comparison But before doing so, let me make some preliminary remarks: 1°) I

prefer to speak of law comparison instead of comparative law Not only we are not dealing with some kind of branch of law, such as eg family law or
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allow universal security rather than require specific security By contrast, civil law jurisdictions have been more cautious in their approach to nonpossessory security and have been anxious about the "false wealth" which such practices are perceived as permitting So in these jurisdictions one finds,

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Notes on Contract Problems and Comparative Law

security for an antecedent debt, the lender would normally be treated as a holder in due course and entitled to recover accordingly These are a few of the examples of the questionable justice of rules of the common law which differ from the rules of law applicable to comparable situations

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