

## RESUMÉ

The subject of this work is the analysis and comparison of the approaches of three different legal systems (the English, the Czech, and the American) to product liability law. The work presents product liability law as a broad and complex field of law covering not only the laws introducing strict liability of a manufacturer for a defective product, but also the more traditional means of legal protection operating within the framework of the law of contract or the law of torts of each respective jurisdiction.

The comparison of the English and the Czech law in this area on the one hand reveals some fundamental differences between AngloAmerican and continental legal systems; on the other hand, however, it also shows an astonishing degree of similarity resulting from the harmonisation of the respective laws, which is driven by the EU. The work also puts considerable emphasis on the analysis of the existing case law, which puts the EU product liability regime into practice, and which started to develop in both jurisdictions only very recently. Furthermore, comments contained herein on the level of compatibility of the national implementations with the respective EC directive may help to ensure their efficient and correct interpretation and operation. A separate chapter is then dedicated to the expected consequences of the adoption of the current wording of the Czech Civil Code Bill.

The following part of the work outlines the development of product liability law in the United States of America. This country, which is generally referred to as the birthplace of vast majority of all pioneer ideas in the field of product liability, provides a lot of interesting opportunities for comparisons with the situation in Europe, which the author tries to appropriately exploit. Attention is given especially to the description of the process of coming and partial going of the idea of strict liability in the United States. In contrast to the rather detailed and technical method of comparison of the Czech and the English law, where the primary source of law in both jurisdictions is the same EC directive, the comparison of the American and the European product liability regime concentrates on more general concepts and ideas in an attempt to analyse, which of the two can currently be described as more consumer friendly. In this context the author also emphasises the importance of certain peculiarities of the American procedural law, which are capable of having substantial impact on practical operation of product liability law on the other side of the Atlantic.