

Abstract

Private international law from a comparative perspective (comparison of a particular segment in Czech law and the law of a selected country)

This thesis works with a comparison of conflict rules in the field of international family law in the Czech Republic and in the Federal Republic of Germany. It is focused concretely on questions of marriage, register partnership and adoption, in which is included an international element. The topic has been taken into account in addition to the national rules of international private law also rules at international and European level. Includes is also future progress in this field.

Thesis is divided into eight chapters. The introduction is followed by first chapter, which deals with general classification of international family law as a part of international private law and their definition. Following chapter is focused on conflict rules, determining factors which may be used to determine the applicable law. Included are terms as public policy, remise or transmise. Chapter three is about general definition of court's jurisdiction to hear the dispute with an international element. Fourth chapter is devoted to marriage, included are sources of legal regulation, jurisdiction of courts in matrimonial matters and comparison of conflict rules in the case of conclusion, termination of marriage, personal and property relations between spouses. On registered partnership is aimed chapter five. Its content is comparison of conflict rules for conclusion, termination and relations between registered partners. Sixth chapter, adoption, there is a comparison of the conflict rules. It includes again legal regulation in this field and determines the jurisdiction of the courts. At the end of my thesis is a conclusion which should briefly resume achieved knowledge.