

Abstract:

This thesis discusses the limits of statute of contractual obligations solely from the perspective of conflict of law rules. It is based primarily on the analysis of national conflict of law rules contained in Act No. 91/2012 Coll., On Private International Law. There are also analyzed relevant standards of the European Parliament and Council Regulation (EC) No. 593/2008 on the law applicable to contractual obligations (Rome I) and conflict of law rules in the German Initial Act to the Civil Code, as well as in the Swiss Act on Private International Law. The primary hypothesis of this work is the concept of a single contractual statute, which governs contractual relationship since the early beginning to the end. The secondary hypothesis follows the departure of German international private law from the principle of seat for the principle of incorporation. Another hypothesis explores the safeguarding of property rights once acquired, if the substantive legal facts are in the mode of the original substantive statute closed that no means no and yes means yes, but ... This work also examines the question of whether the European legislator through the unification of rules of conflict of law removed the deficiencies that resulted from the application of autonomous national conflict of law rules or there is a need for a uniform substantive law, respectively. European Civil Code.