Vorlesung / Course

Introduction to Comparative Law

Einführung in die Rechtsvergleichung

Winter term 2019-2020

http://www.eastlaw.uni-kiel.de
23.10.2019: Basic questions and structures of comparative law
30.10.2019 Structures of comparative law (continued)
06.11.2019: Methods of comparative law: to be postponed
13.11.2019: Methods of comparative law
20.11.2019: Legal families (overview). German (or Germanic) legal family (deutscher Rechtskreis)
27.11.2019: French legal family
04.12.2019: Anglo-American legal family
11.12.2019: The legal systems in Northern and Eastern Europe
08.01.2020: Religious laws, in particular Islamic law
15.01.2020: Contract law I (Vertragsrecht)
22.01.2020: Contract law II
29.01.2020: Torts law (Deliktsrecht)
05.02.2020: Property law (Sachenrecht)
12.02.2020: Civil procedure
Anglo-American legal family

- **Countries of the AA legal family** („common law“)
  - USA
  - UK (England/Wales, [with modification] Scotland, Northern Ireland), British Overseas Territories, Ireland, Commonwealth (Australia, Canada, New Zealand, partly Africa, India, Pakistan, Hongkong and others)


- „**Internal“ differences**: constitutional law, different realizations of common law and statute law. Court system.
UK and USA

United Kingdom of Great Britain and Northern Ireland: 64 million inh., 242,000 km², capital London, constitutional monarchy, union of 4 countries (England, Wales, Scotland, Northern Ireland) with different degrees of autonomy. Plus ca. 14 British Overseas Territories (e.g. Gibraltar, Bahamas …) and Crown Dependencies (Isle of Man, Guernsey, Jersey), permanent member of UN Security Council, member of (British) Commonwealth of Nations, member of EU (since 1973), „Brexit“ 2016/2019?


„Others“: e.g. Commonwealth countries
## Current overseas territories

The fourteen British Overseas Territories are:[11]

<table>
<thead>
<tr>
<th>Flag</th>
<th>Arms</th>
<th>Name</th>
<th>Location</th>
<th>Motto</th>
<th>Area</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Akrotiri and Dhekelia</td>
<td>Mediterranean (Cyprus)</td>
<td></td>
<td>255 km² (98 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Anguilla</td>
<td>Caribbean and North Atlantic Ocean</td>
<td>Strength and Endurance</td>
<td>91 km² (35.1 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Bermuda</td>
<td>North Atlantic Ocean</td>
<td>Quo fata ferunt (Latin: &quot;Whither the Fates carry [us]&quot;&quot;)</td>
<td>54 km² (20.8 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>British Antarctic Territory</td>
<td>Antarctica</td>
<td>Research and discovery</td>
<td>1,709,400 km² (660,000 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>British Indian Ocean Territory</td>
<td>Indian Ocean</td>
<td>In tutela nostra Limuria (Latin: &quot;Limuria is in our charge&quot;)</td>
<td>46 km² (18 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>British Virgin Islands</td>
<td>Caribbean and North Atlantic Ocean</td>
<td>Vigilate (Latin: &quot;Be watchful&quot;)</td>
<td>153 km² (59 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Cayman Islands</td>
<td>Caribbean and North Atlantic Ocean</td>
<td>He hath founded it upon the seas</td>
<td>264 km² (101.9 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Falkland Islands</td>
<td>South Atlantic Ocean</td>
<td>Desire the right</td>
<td>12,173 km² (4,700 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Gibraltar</td>
<td>Iberian Peninsula (Continental Europe)</td>
<td>Nulli expugnabilis hosti (Latin: &quot;No enemy shall expel us&quot;)</td>
<td>6.5 km² (2.5 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Montserrat</td>
<td>Caribbean and North Atlantic Ocean</td>
<td>A people of excellence, moulded by nature, nurtured by God</td>
<td>101 km² (39 sq mi)</td>
</tr>
<tr>
<td><img src="https://example.com" alt="Flag" /></td>
<td><img src="https://example.com" alt="Arms" /></td>
<td>Pitcairn Islands</td>
<td>Pacific Ocean</td>
<td></td>
<td>45 km² (17 sq mi) (all islands)</td>
</tr>
</tbody>
</table>

[11] This list is subject to change as British overseas territories may be altered or terminated at the discretion of the British government.
Legislation
This section contains all primary and secondary legislation consolidated to date. Items will continue to be added as and when they become available. The process of consolidation will be on-going with all legislation being amended and placed on the database as soon as possible after it comes into force.
If you are new to this website it is recommended that you first click on the button marked “Help” below for assistance on how to enter search criteria, open and save documents, etc. To search the site click on the “Search” button below and enter the relevant search criteria in the form.
Whilst the Gibraltar Law Office - Admin Office and Gazette has taken considerable care to find all amending enactments if any person finds any inaccuracies please click on the report errors to text link above.
Search for legislation.
Help on how to use the site.
Contact Us to send your comments on this website.
Laws of Gibraltar - Judgments
The **Commonwealth of Nations**, commonly known as the **Commonwealth** (formerly the **British Commonwealth**), is an intergovernmental organisation of 53 member states that were mostly territories of the former British Empire.

The Commonwealth operates by intergovernmental consensus of the member states, organised through the Commonwealth Secretariat and Non-governmental organisations, organised through the Commonwealth Foundation.
Remarks on general history of UK and USA

- **England and UK**: Prehistory (e.g. Stonehenge, Celtic culture) – since 1st century Roman conquest – since 5th century Angles and Saxons - 1066 Norman conquest - 1707 (England + Scotland: UK) – 1801 (Acts of Union: Ireland enters UK) – 1922 (in UK remains Northern Ireland), 1973 UK enters EEC, …

- **USA**: 1492 Christopher Columbus discovers America; USA founded in 1776 (Declaration of Independence, first independence from colonialist England), American Civil War 1861-1865, „superpower“ since WW II.

- **Others**: …
Remarks on the legal history of England and the U.S.

- **England (as part of UK)**
  - Magna Carta 1215 – no written Constitution?
  - Common Law (since 12th century) and Equity – English approach; „writs“; strict observance of precedents.

- **United States of America**
  - Constitution of 1787 + 10 Amendments (Bill of Rights, 1791), federal state,
  - Common Law and Equity - US approach: more flexible approach as to precedents
  - Great power approach as to international law.
Brexit in the Supreme Court

Can the government launch Brexit without an Act of Parliament? That’s what the UK’s highest court will be asked to consider when the government’s appeal opens on 5 December.

You can watch the entire four-day hearing on the UK Supreme Court’s website and some of it will be shown live on television. So what should you look out for?

The government is challenging the need to pass a law to trigger Brexit

Three senior judges sitting in the Divisional Court (part of the High Court) decided on 3 November that David Davis, who as Brexit Secretary is the minister responsible for exiting the European Union, cannot use the Crown’s inherent powers to trigger Brexit.

It was a victory for the two claimants, Gina Miller and Deir Dos Santos.

The judges were careful not to say what the government needed to do before it could withdraw from the EU. But if ministers cannot use their executive powers to give notice under Article 50 of the Treaty on European Union, then it’s thought that nothing less than an Act of Parliament will do.
R (Miller) v Secretary of State for Exiting the European Union

From Wikipedia, the free encyclopedia

R (Miller) v Secretary of State for Exiting the European Union [2017] UKSC 56 is a legal case decided by the United Kingdom Supreme Court on 24 January 2017, which ruled that the UK Government (the executive) may not initiate withdrawal from the European Union by formal notification to the Council of the European Union as prescribed by Article 50 of the Treaty on European Union without an Act of the UK Parliament permitting the government to do so. Two days later, the government responded by bringing to Parliament the European Union (Notification of Withdrawal) Bill 2017 for first reading in the House of Commons on 26 January 2017. The case is informally referred to as "the Miller case"[1] or "Miller's case."[2]

The Supreme Court's decision was given on appeal from the High Court's ruling[3] that the Crown's foreign affairs prerogative, which is exercised by the government led by the Prime Minister, may not be used to nullify rights that Parliament has enacted through primary legislation. The case was seen as having constitutional significance in deciding the scope of the royal prerogative in foreign affairs.[4] The Supreme Court also ruled that devolved legislatures in Scotland, Wales and Northern Ireland have no legal right to veto the act.[8]

The government's appeal was against the High Court order dated 7 November 2016 that formally declared: "The Secretary of State does not have power under the Crown's prerogative to give notice pursuant to Article 50 of the Treaty on European Union for the United Kingdom to withdraw from the European Union." The Supreme Court heard the appeal from 5 December 2016 to 8 December 2016, and, by a majority of 8–3, upheld the High Court ruling, finding that authorisation by Parliament was required for the invocation of Article 50.[9]

The case was intervened by the Lord Advocate and the Counsel General for Wales for the Scottish and Welsh governments (respectively as the Scottish and Welsh Ministers), and applicants for judicial review in Northern Ireland also had their three separate applications considered together with this case, all of whom argued that the Scottish Parliament, the National Assembly for Wales and the Northern Ireland Assembly all had to consent to the invocation of Article 50. In each case this was unanimously rejected by the court.[6]
European Union (Withdrawal) Act 2018

2018 CHAPTER 16

An Act to repeal the European Communities Act 1972 and make other provision in connection with the withdrawal of the United Kingdom from the EU.

[26th June 2018]

BE IT ENACTED by the Queen's most Excellent Majesty, by and with the advice and consent of the Lords Spiritual and Temporal, and Commons, in this present Parliament assembled, and by the authority of the same, as follows:—

Repeal of the ECA

1 Repeal of the European Communities Act 1972

The European Communities Act 1972 is repealed on exit day.

Retention of existing EU law

2 Saving for EU-derived domestic legislation

(1) EU-derived domestic legislation, as it has effect in domestic law immediately before exit day, continues to have effect in domestic law on and after exit day.

(2) In this section “EU-derived domestic legislation” means any enactment so far as—

   (a) made under section 2(2) of, or paragraph 1A of Schedule 2 to, the European Communities Act 1972,
   (b) passed or made, or operating, for a purpose mentioned in section 2(2)(a) or (b) of that Act,
   (c) relating to anything—

      (i) which falls within paragraph (a) or (b), or
Subject: Draft Agreement on the withdrawal of the United Kingdom of Great Britain and Northern Ireland from the European Union and the European Atomic Energy Community highlighting the progress made (coloured version) in the negotiation round with the UK of 16-19 March 2018.

Origin: European Commission, Task Force for the Preparation and Conduct of the Negotiations with the United Kingdom under Article 50 TEU.

Objective: Sent to the EU27 Member States, to the Brexit Steering Group of the European Parliament and published on the TF50 website on 19 March 2018.

Remarks: In green, the text is agreed at negotiators' level and will only be subject to technical legal revisions in the coming weeks.

In yellow, the text is agreed on the policy objective but drafting changes or clarifications are still required.
PART ONE: COMMON PROVISIONS
ARTICLE 1 Objective
ARTICLE 2 Definitions
ARTICLE 3 Territorial scope
ARTICLE 4 Methods and principles relating to the effect, the implementation and the application of this Agreement
ARTICLE 5 Good faith: The Union and the United Kingdom shall, in full mutual respect and good faith, assist each other in carrying out tasks which flow from this Agreement.

PART TWO: CITIZENS' RIGHTS

PART THREE: SEPARATION PROVISIONS
TITLE I: GOODS PLACED ON THE MARKET
TITLE VI: ONGOING JUDICIAL COOPERATION IN CIVIL AND COMMERCIAL MATTERS

PART FOUR: TRANSITION
ARTICLE 126 Transition period: There shall be a transition or implementation period, which shall start on the date of entry into force of this Agreement and end on 31 December 2020.
ARTICLE 127: Scope of the transition
1. Unless otherwise provided in this Agreement, Union law shall be applicable to and in the United Kingdom during the transition period.
Generalanwalt Campos Sánchez-Bordona schlägt dem Gerichtshof vor, festzustellen, dass Art. 50 EUV es zulasse, die Mitteilung der Absicht, aus der Union auszutreten, einseitig zurückzunehmen

Diese Möglichkeit bestehe bis zum Zeitpunkt des Abschlusses des Austrittsabkommens

Auf Antrag mehrerer Abgeordneter des schottischen Parlaments, des Parlaments des Vereinigten Königreichs und des Europäischen Parlaments hat ein schottisches Gericht, der Court of Session, Inner House, First Division (Scotland) (Oberstes Gericht, Berufungsabteilung, Erste Kammer), dem Gerichtshof die Frage vorgelegt, ob ein Mitgliedstaat, der im Einklang mit Art. 50 EUV dem Europäischen Rat seine Absicht mitgeteilt hat, aus der Union auszutreten, diese Mitteilung einseitig zurücknehmen kann und, wenn ja, unter welchen Voraussetzungen.

Da das Parlament des Vereinigten Königreichs unabhängig davon, ob ein Austrittsabkommen zustande kommt oder nicht, seine abschließende Zustimmung erteilen muss, sind mehrere Abgeordnete der Ansicht, dass die Rücknahme dem Vereinigten Königreich die Möglichkeit eröffnen würde, angesichts eines unbefriedigenden Brexit in der Union zu bleiben. Das vorliegende Gericht scheint sich dieser Ansicht anzuschließen, denn es führt aus, die Antwort des Gerichtshofs würde den Abgeordneten des Vereinigten Königreichs Klarheit über die Optionen verschaffen, die sie bei ihrer Stimmabgabe hätten.

Die Regierung des Vereinigten Königreichs trägt vor, die Vorlagefrage sei unzulässig, da sie hypothetischen und rein theoretischen Charakter habe. Es gebe keine Anhaltspunkte dafür, dass die Regierung oder das Parlament des Vereinigten Königreichs die Mitteilung der Austrittsabsicht zurücknehmen werde.

In seinen heutigen Schlussanträgen kommt Generalanwalt Manuel Campos Sánchez-Bordona zu dem Ergebnis, dass keiner der Umstände vorliege, unter denen ein Vorabentscheidungssuch zu erklären sei. Es handele sich um einen echten Rechtsstreit, die Frage sei weder rein akademisch noch verfrüht oder überflüssig, sondern habe offenkundig praktische Bedeutung, und sie sei für die Entscheidung des Rechtsstreits erforderlich. Außerdem sei der Gerichtshof für die definitive und einheitliche Auslegung von Art. 50 EUV 

Importance of constitutional jurisprudence in US
US Supreme Ct. (1803), Marbury v. Madison
(from Wikipedia)

Marbury v. Madison, 5 U.S. 137 (1803), is a landmark United States Supreme Court case in which the Court formed the basis for the exercise of judicial review in the United States under Article III of the Constitution. The landmark decision helped define the boundary between the constitutionally separate executive and judicial branches of the American form of government.

The case resulted from a petition to the Supreme Court by William Marbury, who had been appointed Justice of the Peace in the District of Columbia by President John Adams but whose commission was not subsequently delivered. Marbury petitioned the Supreme Court to force the new Secretary of State James Madison to deliver the documents. The Court, with John Marshall as Chief Justice, found firstly that Madison's refusal to deliver the commission was both illegal and remediable. Nonetheless, the Court stopped short of compelling Madison (by writ of mandamus) to hand over Marbury's commission, instead holding that the provision of the Judiciary Act of 1789 that enabled Marbury to bring his claim to the Supreme Court was itself unconstitutional, since it purported to extend the Court's original jurisdiction beyond that which Article III established. The petition was therefore denied.
“the Supreme Court shall have original jurisdiction in all cases affecting ambassadors, or other public ministers and consuls, and those in which a state shall be a party. In all other cases, the Supreme Court shall have appellate jurisdiction“.
Basic elements of the Anglo-American legal family

• Sources of law (selection): US Const. 1787/1789. EU dimension in UK (*but Brexit 2019?*).

• Typical legal institutes/theories of common law: e.g. in contracts, torts, trust

• Methodical characteristics: „doctrine of precedent“ (or doctrine of stare decisis)

• Legal literature:
  • Internet
  • LexisNexis, Westlaw, HeinOnline.
  • OUP, Sweet & Maxwell, Hart Publishing, Butterworths; West Publishing [Thomson Reuters], Matthew Bender [Reed Elsevier]
Particular elements of English law

- History: Magna Carta Libertatum (1215), development of case law since 12 century.
- Distinguish: UK (since 1707) – England/Wales, Scotland + Northern Ireland
- Important figures, e.g. William Blackstone, Lord Denning
- Constitutional law
- Substantive private law (Common Law): e.g. contracts law („consideration“), agency, torts, property, trust
Alfred Thompson "Tom" Denning, Baron Denning, OM, PC, DL, KC (23 January 1899 – 5 March 1999), commonly known as Lord Denning, was a British lawyer and judge. He gained degrees in mathematics and law at Oxford University, although his studies were disrupted by his service in the First World War. He then began his legal career, distinguishing himself as a barrister and becoming a King's Counsel in 1938. Denning became a judge in 1944 with an appointment to the Family Division of the High Court of Justice and was made a Lord Justice of Appeal in 1948 after less than five years in the High Court. He became a Lord of Appeal in Ordinary in 1957 and after five years in the House of Lords returned to the Court of Appeal as Master of the Rolls in 1962, a position he held for twenty years. In retirement he wrote several books and continued to offer opinions on the state of the common law through his writing and his position in the House of Lords. One of the most publicly known judges thanks to his report on the Profumo Affair, Denning was held in high regard by much of the judiciary, the Bar and the public, and was noted for his bold judgments running counter to the law at the time. …
Procedural law and legal education in England

• Court system and civil procedure in England
  - Court system: Magistrates Courts - County Courts - High Court, Court of Appeal, Supreme Court (formerly House of Lords)
    *[Supr. Court also for UK]*
  - Judicial „style“

• Legal education, legal profession (in part. solicitors and barristers)
The Royal Courts of Justice in London, home of the Senior Courts of England and Wales
The Supreme Court, as well as being the final court of appeal in the United Kingdom, has a role in the UK Judicial system and in the relationship of the UK with Europe. It hears appeals on points of law of great importance, and maintains and develops the role of the highest court in the world.

The Supreme Court hears appeals from the following:

- England and Wales
- Northern Ireland
- Scotland
- Isle of Man
- Jersey
- Guernsey
- High Court of Australia
- Federal Court of Australia
- High Court of New Zealand
- High Court of Papua New Guinea
- High Court of Vanuatu
- High Court of Cook Islands
- High Court of Tonga

The Supreme Court is also the final court of appeal for all cases involving the interpretation of the Constitution of the United Kingdom.
United States law

- History
- Important figures, e.g. Joseph Story, Karl N. Llewellyn, Louis Brandeis, Benjamin Cardozo, Richard Posner
- Substantive private law:
  - fed. and state statutes. Uniform Laws, e.g. UCC.
  - Common Law. Particular example: protection of privacy. Restatement of the Law
Erie Railroad Co. v. Tompkins, 304 U.S. 64 (1938), is a landmark decision by the Supreme Court of the United States in which the Court held that federal courts did not have the judicial power to create general federal common law when hearing state law claims under diversity jurisdiction. In reaching this holding, the Court overturned almost a century of federal civil procedure case law, and established the foundation of what remains the modern law of diversity jurisdiction as it applies to United States federal courts.
Joseph Story (* 18. September 1779 in Marblehead, Essex County, Massachusetts; † 10. September 1845 in Cambridge) was an American lawyer. At the age of only 32 years he became in 1811 the youngest ever judge at the US Supreme Court. He is well-known both as a judge and as a legal writer.
Procedural law and legal education in the US

• Court system and civil procedure
  - Court system: federal courts, state courts.
  - Some characteristic elements: jury trial, pre-trial discovery, contempt of court, class actions, „American rule of costs“, contingency fee
  - Judicial style

• Legal education, legal profession.
State Court Organization Chart

Alabama    Florida    Louisiana    Nebraska    Ohio
Alaska     Georgia    Maine       Nevada       Oklahoma
Arizona    Hawaii     Maryland    New Hampshire Oregon
Arkansas   Idaho      Massachusetts New Jersey    Pennsylvania
California Illinois  Michigan    New Mexico    Puerto Rico
Colorado   Indiana    Minnesota   New York,Civil Rhode Island
Connecticut Iowa      Mississippi New York,Criminal South Carolina
Delaware   Kansas     Missouri    North Carolina South Dakota
District of Columbia Kentucky Montana North Dakota Tennessee
Texas      Utah        Vermont     Virginia     Washington
West Virginia Wisconsin   Wyoming

California Court Structure

State High Court

Court(s) of Last Resort
Supreme Court

Intermediate Court

Intermediate Appellate Court(s)
Court of Appeals

Trial Court

Court(s) of General Jurisdiction*
Superior Court

* When courts of general jurisdiction act in an appellate capacity, their decisions may appear in the Intermediate Court zone of the history display.

Colorado Court Structure

State High Court

Court(s) of Last Resort
Supreme Court

Intermediate Court

Intermediate Appellate Court(s)
Court of Appeals

Trial Court

Court(s) of General Jurisdiction*
Superior Court

* When courts of general jurisdiction act in an appellate capacity, their decisions may appear in the Intermediate Court zone of the history display.
US Supreme Court
John Glover Roberts, Jr. (born January 27, 1955) is the 17th and current Chief Justice of the United States. He has served since 2005, having been nominated by President George W. Bush after the death of Chief Justice William Rehnquist. He has been described as having a conservative judicial philosophy in his jurisprudence. Roberts grew up in northern Indiana and was educated in a private school before attending Harvard College and Harvard Law School, where he was managing editor of the Harvard Law Review. After being admitted to the bar, he served as a law clerk for Judge Henry Friendly and then Justice Rehnquist before taking a position in the Attorney General's office during the Reagan Administration. He went on to serve the Reagan Administration and the George H. W. Bush administration in the Department of Justice and the Office of the White House Counsel, before spending 14 years in private law practice. During this time, he argued 39 cases before the Supreme Court.

In 2003, he was appointed as a judge of the D.C. Circuit by President George W. Bush, where he was serving when he was nominated to be an Associate Justice of the Supreme Court, initially to succeed retiring Justice Sandra Day O'Connor. When Chief Justice Rehnquist died before Roberts's confirmation hearings, Bush renominated Roberts to fill the newly vacant center seat.
List of 100 largest law firms by revenue

This is a list of the world's largest law firms by revenue.[1]

<table>
<thead>
<tr>
<th>Rank</th>
<th>Name</th>
<th>Revenue</th>
<th>Office Reach</th>
<th>Headquarters</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Baker &amp; McKenzie</td>
<td>$2,419.0m</td>
<td>International</td>
<td>USA (Chicago, IL)</td>
</tr>
<tr>
<td>2</td>
<td>Skadden, Arps, Slate, Meagher &amp; Flom</td>
<td>$2,320.0m</td>
<td>International</td>
<td>USA (New York, NY)</td>
</tr>
<tr>
<td>3</td>
<td>Norton Rose Fulbright</td>
<td>$2,090.0m</td>
<td>International</td>
<td>UK</td>
</tr>
<tr>
<td>4</td>
<td>Linklaters</td>
<td>$1,940.0m</td>
<td>International</td>
<td>UK (London)</td>
</tr>
<tr>
<td>5</td>
<td>Freshfields Bruckhaus Deringer</td>
<td>$1,930.0m</td>
<td>International</td>
<td>UK (London)</td>
</tr>
<tr>
<td>5</td>
<td>Allen &amp; Overy</td>
<td>$1,930.0m</td>
<td>International</td>
<td>UK (London)</td>
</tr>
<tr>
<td>6</td>
<td>Clifford Chance</td>
<td>$1,874.5m</td>
<td>International</td>
<td>UK (London)</td>
</tr>
<tr>
<td>7</td>
<td>Latham &amp; Watkins</td>
<td>$1,821.0m</td>
<td>International</td>
<td>USA (Los Angeles, CA)</td>
</tr>
<tr>
<td>8</td>
<td>Hogan Lovells</td>
<td>$1,718.0m</td>
<td>International</td>
<td>UK (London) USA (Washington, DC)</td>
</tr>
<tr>
<td>9</td>
<td>Jones Day</td>
<td>$1,520.0m</td>
<td>International</td>
<td>USA (Cleveland, OH)</td>
</tr>
<tr>
<td>10</td>
<td>Kirkland &amp; Ellis</td>
<td>$1,428.0m</td>
<td>International</td>
<td>USA (Chicago)</td>
</tr>
<tr>
<td>11</td>
<td>Sidley Austin</td>
<td>$1,357.0m</td>
<td>International</td>
<td>USA (Chicago)</td>
</tr>
<tr>
<td>12</td>
<td>White &amp; Case</td>
<td>$1,307.0m</td>
<td>International</td>
<td>USA (New York)</td>
</tr>
<tr>
<td>13</td>
<td>Weil, Gotshal &amp; Manges</td>
<td>$1,233.0m</td>
<td>International</td>
<td>USA (New York)</td>
</tr>
<tr>
<td>14</td>
<td>Greenberg Traurig</td>
<td>$1,173.0m</td>
<td>International</td>
<td>USA (Miami, FL)</td>
</tr>
<tr>
<td>15</td>
<td>Mayer Brown</td>
<td>$1,118.0m</td>
<td>International</td>
<td>USA (Chicago)</td>
</tr>
<tr>
<td>16</td>
<td>Reed Smith</td>
<td>$1,080.0m</td>
<td>International</td>
<td>USA (Pittsburgh)</td>
</tr>
<tr>
<td>17</td>
<td>Morgan, Lewis &amp; Bockius</td>
<td>$1,068.5m</td>
<td>International</td>
<td>USA (Philadelphia, PA)</td>
</tr>
</tbody>
</table>
Please add your own comparison of court systems

<table>
<thead>
<tr>
<th>Comp. Questions</th>
<th>France</th>
<th>Germany</th>
<th>UK</th>
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