

MICHIGAN LEGAL STUDIES



THE CONFLICT OF LAWS

A Comparative Study

PUBLISHED UNDER THE AUSPICES OF THE UNIVERSITY OF MICHIGAN
LAW SCHOOL (WHICH, HOWEVER, ASSUMES NO RESPONSIBILITY FOR
THE VIEWS EXPRESSED) WITH THE AID OF FUNDS DERIVED FROM
GIFTS TO THE UNIVERSITY OF MICHIGAN BY WILLIAM W. COOK.

MICHIGAN LEGAL PUBLICATIONS

Hessel E. Yntema, Editor

MICHIGAN LEGAL STUDIES

DISCOVERY BEFORE TRIAL
George Ragland, Jr.

TORTS IN THE CONFLICT OF LAWS
Moffat Hancock

THE AMENDING OF THE FEDERAL
CONSTITUTION
Lester B. Orfield

REVIEW OF ADMINISTRATIVE ACTS
Armin Uhler

THE PREVENTION OF REPEATED
CRIME
John Barker Waite

THE CONFLICT OF LAWS: A
COMPARATIVE STUDY
Three Volumes
Ernst Rabel

UNREPORTED OPINIONS OF THE
SUPREME COURT OF MICHIGAN,
1836-1943
William Wirt Blume, *Editor*

PROBLEMS IN PROBATE LAW:
INCLUDING A MODEL PROBATE CODE
Lewis M. Simes & Paul E. Basye

SOVIET CIVIL LAW
Two Volumes
Vladimir Gsovski

SURVEY OF METROPOLITAN COURTS:
DETROIT AREA
Maxine Boord Virtue

ADMINISTRATIVE AGENCIES AND THE
COURTS
Frank E. Cooper

OUR LEGAL SYSTEM AND HOW IT
OPERATES
Burke Shartel

RETROACTIVE LEGISLATION AFFECTING
INTERESTS IN LAND
John Scurlock

INTEGRATION OF PUBLIC UTILITY
HOLDING COMPANIES
Robert F. Ritchie

PERPETUITIES AND OTHER
RESTRAINTS
William F. Fratcher

FOREIGN PERSONAL REPRESENTATIVES
Banks McDowell, Jr.

NONPROFIT CORPORATION STATUTES
Ralph E. Boyer

UNIVERSITY OF MICHIGAN PUBLICATIONS: LAW

TRANSACTIONS OF THE SUPREME
COURT OF THE TERRITORY OF
MICHIGAN 1805-1836
Six Volumes

William Wirt Blume, *Editor*
RATIFICATION OF THE TWENTY-FIRST
AMENDMENT OF THE CONSTITUTION
OF THE UNITED STATES
Everett S. Brown, *Compiler*

COOLEY LECTURES

THE CONSTITUTION AND
SOCIO-ECONOMIC CHANGE
Henry Rottschaefer

SOME PROBLEMS OF EQUITY
Zechariah Chafee, Jr.

OUR LEGAL SYSTEM AND HOW IT
OPERATES
Burke Shartel
(published in Michigan Legal
Studies)

SELECTED TOPICS ON THE LAW OF
TORTS
William L. Prosser

A COMMON LAWYER LOOKS AT THE
CIVIL LAW
Frederick H. Lawson

PUBLIC POLICY AND THE DEAD HAND
Lewis M. Simes

SUMMER INSTITUTE LECTURES

THE CONFLICT OF LAWS AND
INTERNATIONAL CONTRACTS: 1949
THE LAW AND LABOR MANAGEMENT
RELATIONS: 1950

TAXATION OF BUSINESS
ENTERPRISE: 1951

ATOMIC ENERGY—INDUSTRIAL AND
LEGAL PROBLEMS: 1952

FEDERAL ANTITRUST LAWS: 1953

COMMUNICATIONS MEDIA—LEGAL
AND POLICY PROBLEMS: 1954

LEGISLATIVE RESEARCH PUBLICATIONS

CURRENT TRENDS IN STATE
LEGISLATION, 1952

CURRENT TRENDS IN STATE
LEGISLATION, 1953-1954

THE CONFLICT OF LAWS

A Comparative Study

by

ERNST RABEL

VOLUME FOUR

Property: Bills and Notes: Inheritance: Trusts:
Application of Foreign Law: Intertemporal Relations

Ann Arbor

UNIVERSITY OF MICHIGAN LAW SCHOOL

1958

COPYRIGHT, 1958

BY

UNIVERSITY OF MICHIGAN

EDITORIAL NOTE: With this fourth and final volume, the monumental survey of existing systems of conflicts law, initiated by the late Ernst Rabel in 1939 under the auspices of the American Law Institute but conducted after 1942 through the generous sponsorship of the University of Michigan Law School, is completed. It is most fortunate that, despite the fact that the present volume was prepared in various institutions during the years immediately preceding the author's death on September 7, 1955, he not only finished but also revised the proofs of the text; the various tables were later compiled at Ann Arbor.

As in the case of the preceding volumes, the research embodied in the present volume was made possible by the continued and substantial support made available by the University of Michigan Law School out of the W. W. Cook Trust funds, complemented by a generous gift of the James Foundation, provided through the good offices of the Harvard Law School.

Among the many at the University of Michigan and elsewhere who assisted in the preparation of this volume, the editor is under special obligation to Dr. Dietrich Schindler for painstaking assistance in the collection and verification of the basic materials and to Mrs. Evelyn Bianchi for the detailed preparation of the manuscript, as well as to Mrs. A. Duncan Whitaker who compiled the tables and Dr. Giuseppe Bisconti who collated the index. *Finis coronat opus.*