Abstrakt rigorózní práce v anglickém jazyce:

This thesis compares the determination of governing law in selected obligations in the Czech Republic and in the United States. This comparison is made against the background of two principles: legal certainty (typical for the Czech Republic) and Equity (typical for the United States). Chapter one discusses the different approaches to private international law in the two countries, and discusses the relationship between Equity and Legal Certainty. Chapter one also discusses the applicable sources of law.

Chapter two compares the different approaches to choice of law in contractual obligations. The choice-of-law rules of relevant Czech and European statutes are analyzed in detail. Furthermore, the American approaches to choice of law are introduced and examined, namely: the First Restatement approach, Currie's Interest Analysis, the Second Restatement approach, the Better Law Approach, and the Significant Contacts Approach. Chapter three is analogical to chapter two, but it focuses on non-contractual obligations (Torts). The focus of this chapter is EU Regulation Rome II and the particularities of the First and Second Restatements and Currie's Interest Analysis when applied to torts. The conclusion summarizes the author's main ideas and opinions.