

The Thesis compares UNCITRAL Model Rules on Cross-Border Insolvencies with current Czech legislation. In the first part, it briefly depicts main cross-border insolvency systems, as they were developed by leading scholars. Furthermore, the protocols, as a unique solution to a multinational default are discussed. In the second part, it applies principles of economic approach to law and discusses the pros and cons of the Czech system in comparison to the Model Rules using specific examples. The outcome of the Thesis is analysis of several features the Model Rules and Czech legislation differs.