

Abstract

This thesis compares the basic institutes of the sales contracts under the Uniform Commercial Code in the U.S.A. with the corresponding institutes of the Czech private law and where appropriate with the institutes of the United Nations Convention, the draft of the new Czech civil code and the draft of (European) common frame of reference.

The thesis deals with the comparison of both rules generally, the sources of law and the contract law system in the U.S.A., interpretation, specificities of the transnational sales contracts, legal regimes of sales contracts and distinction from other contract types.

Main part of the thesis focuses on the sales contract formation, offers and acceptances, modification and implied terms. The thesis is concluded with the formal requirements on sales contracts and the notion of mistake.