

Abstract (in English):

The final thesis deals with the analysis of selected principles of the Czech and English contract law. The aim of the final thesis was to highlight common and different features of the Czech and English law based on the selected principles and simultaneously to illustrate the differences in legal reasoning between the two countries. The author describes the significance of the English law in the first chapter, followed by the chapter concerning formation of a contract in the Czech and English law. Attention is being paid to an offer, further analysis includes the possibility of revocation of an offer and the different approaches adopted to these problems in the legal frameworks of the Czech Republic and England. The author then proceeds to the description of acceptance of an offer, formation and conclusion of a contract and effectiveness of an acceptance in the case of distance dealing between the parties. Comparison with PECL and UNIDROIT is being made and the author concludes, that both the Czech and English contract law adopt the same solutions for an acceptance and conclusion of a contract, which, however, do not coincide with the rules laid down in PECL and UNIDROIT. Critical assessment of the provisions concerning the offer and acceptance in the Czech Civil Code Bill, which present a deviation from the current law position and which adopt the solution proposed by PECL and UNIDROIT, is being made by the author. The next chapter describes the English principles of consideration and its role within the English law. Comparison of the legal rules concerning variation of a contract in the Czech and English law is being made, where there is a possibility to project the principle of consideration also to the Czech law. In this chapter, the author critically evaluates in a comparative analysis the decisions of the Supreme Court of the Czech Republic, concerning the variation of an existing contract by conduct (by factual performance). Attention is being paid to the application of the principle of consideration in the Czech law and in PECL and UNIDROIT. The dissection of the judicature of the Supreme Court of the Czech Republic shows infiltrating of the consideration principle to the Czech law. The next chapter deals with the comparison of termination of a contract by breach in the Czech Republic and England. Different approach of the English law to the contractual

obligations is being explained, common and different features in the legal orders of the Czech Republic and England concerning the termination of a contract are being evaluated. Further, systematic comparison of two, based on facts, identical judicial decisions from the Czech Republic and England is being made, where the differences in the legal rules regarding termination of a contract between the two legal orders can be demonstrated. The last chapter is conclusion, where some general conclusions and recommendations for the future are being drawn.