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PUBLIC POLICY AS A DEFENCE IN THE RECOGNITION OF FOREIGN JUDGMENTS: A TOOL OF PROTECTION OR A CLOAK FOR JUDICIAL NATIONALISM

Ms. B. Namita Varshini

4th Year, B.B.A. LL.B. (Hons.), Symbiosis Law School, Pune.

ABSTRACT

The recognition and enforcement of foreign judgments are cornerstones of private international law, facilitating cross-border commerce, legal certainty, and international cooperation. This framework provides that the public policy exception is a doctrine that allows domestic courts to refuse enforcement where a foreign judgment offends the fundamental legal, moral, or constitutional values of the forum state. While this exception operates as an essential safeguard of sovereignty and justice, its inherently open-ended nature renders it vulnerable to inconsistent application and judicial overreach. The following paper critically reconsiders the public policy defense in terms of this double-edged instrument, serving both as a necessary protection and a potential vehicle for judicial nationalism. Through the comparison of jurisprudence within the United States, the United Kingdom, India, Canada, and the European Union - in addition to international instruments such as the Hague Judgments Convention - this study traces the doctrinal evolution of public policy from broad discretionary origins toward increasingly restrained interpretations. It argues that expansive readings of public policy undermine international comity, predictability, and reciprocity in judgment enforcement. The paper argues that a harmonized and restrictive approach of confining the exception to manifest violations of fundamental justice or due process, or constitutional principles, is necessary to retain any integrity in international dispute resolution. It concludes by making a call for clearer statutory guidance and judicial consistency in striking a calibrated balance between sovereignty and cooperation in the global legal order.

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***Keywords**:* Foreign Judgments; International Comity; Judicial Nationalism; Private International Law; and Public Policy.

INTRODUCTION

The doctrine of recognition and enforcement of foreign judgments is at the core of private international law.[1] In an era where states are becoming more interdependent, the free transfer of judgments between courts makes foreign transactions certain, induces friendly relations between states, and protects the rights of parties to international disputes. The rule, however, is not absolute. Virtually every jurisdiction has the "public policy" exception, whereby domestic courts can decline recognition of a foreign judgment if it is against the fundamental values, morals, or legal principles of the forum state. While this defense is a protection against judgments that could erode a state's sovereignty or constitutional culture, it is also vulnerable to abuse as a shield for judicial protectionism or odious nationalism.[2] This double-edged nature of international public policy, as both necessary limitation and potential pretence, renders this one of the most disputed exceptions to the recognition of foreign judgments.

- **THESIS STATEMENT:**

This essay contends that the raising of public policy in defence must walk a thin line: it must defend the constitutional identity and inherent values of the forum state without, on the other hand, allowing the development of judicial nationalism, which hinders the free movement of judgments. The argument will locate the points at which courts have struggled between narrow and wide conceptions of public policy, and explain why there must be a more uniform and restrictive approach to secure the integrity of international dispute resolution.

- **NEED AND RELEVANCE:**

The need to address the public policy defense stems from its increasing relevance in the international legal order. As international trade, emigration, and conflicts continue to grow, parties increasingly turn towards the recognition of foreign judgments in seeking justice beyond borders. However, states are keen on upholding legal sovereignty and enforcing moral order. This is where the defense of public policy finds its worth and makes or breaks

[1] Marussia Borm-Reid, Recognition and Enforcement of Foreign Judgments, 3(1) Int'l & Comp. L.Q. 49 (1954).
[2] Funke Adekoya, SAN, The Public Policy Defence to Enforcement of Arbitral Awards: Rising Star or Setting Sun?, 2(2) BCDR Int'l Arb. Rev. (2015).

international cooperation. Its importance today is made more complex by conflicting approaches of courts: while some states have a restrictive approach to enable recognition, other states have a wider approach to public policy, leading to uncertainty and indeterminacy.[3] Such divergences render the doctrine a space of importance wherein to ascertain whether it is indeed a protective shield or used as a farce of judicial nationalism.

LITERATURE REVIEW

- **"THE PUBLIC POLICY EXCEPTION TO THE ENFORCEMENT OF FOREIGN JUDGMENTS: NECESSARY OR NEMESIS"[4] – BY KAREN MINEHAN**

This article is a seminal exploration of the contentious function of the public policy defence. Her case is that the exception is a "safety valve," essential to the protection of constitutional and moral values, though warning against abuse at the risk of destroying the principle of international comity. By examining U.S. jurisprudence pursuant to Hilton's case[5] and the Restatement (Second) and comparing it to European practice under the Brussels[6] and Lugano[7] Conventions, Minehan proves that courts tend to narrowly construe the exception. Her reliance upon cases like Somportex[8] and Matusevitch[9] proves that the exception has been invoked sparingly, being primarily confined to the violation of due process, penal sanctions, or violations of fundamental justice.

Nevertheless, Minehan's analysis, though compelling, is revealed to identify central areas of research in need of fill that continue to be relevant today. Composed in the mid-1990s, it fails to take into consideration subsequent developments like the 2005 Hague Choice of Court Convention[10] or the 2019 Hague Judgments Convention[11], which seek to harmonize

[3] Ibid.
[4] Karen E. Minehan, The Public Policy Exception to the Enforcement of Foreign Judgments: Necessary or Nemesis, 18 Loy. L.A. Int'l & Comp. L.J. 795 (1995).
[5] Hilton v. Guyot, 159 U.S. 113, 164-65 (1895).
[6] European Communities Convention on Jurisdiction and the Enforcement of Judgments in Civil and Commercial Matters, Sept. 27, 1968, 1972 O.J. (L 299) 32, reprinted in 8 I.L.M. 229, amended by Convention on Accession to the Convention on Jurisdiction and the Enforcement of Judgments in Civil and Commercial Matters, Oct. 9, 1978, 1978 O.J. (L 304) 1, reprinted in 18 I.L.M. 21 [Brussels Convention].
[7] Convention on Jurisdiction and Enforcement of Judgments in Civil and Commercial Matters, 1988 O.J. (L 319) 9, reprinted in 28 I.L.M. 620 [Lugano Convention].
[8] Somportex Ltd. v. Phila. Chewing Gum Corp., 453 F.2d 435, 443 (3d Cir. 1971),' cert. denied, 405 U.S. 1017 (1972) (quoting Goodyear v. Brown, 26 A. 665, 666 (Pa. 1893)).
[9] Matusevitch v. Telnikof 877 F. Supp. 1 (D.D.C. 1995).
[10] Convention of 30 June 2005 on Choice of Court Agreements 44 ILM 1294 (HCCH).
[11] Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters (HCCH 2019 Judgments Convention).

recognition regimes while continuing to maintain a narrowly defined public policy exception. Nor does it tackle the surge in judicial nationalism in rising economies, where courts can expand the exception for socio-political purposes, or the challenges of globalization and electronic commerce. The article's U.S.-Europe focus underinvests in how Asian and African jurisdictions apply public policy, where cultural and constitutional values tend to redefine enforcement debates. These voids underscore the urgent need for modern scholarship to scrutinize whether the exception remains an acceptable safeguard or threatens to develop into a covert trade barrier to cross-border judicial cooperation.

- **"THE PUBLIC POLICY DEFENSE TO RECOGNITION AND ENFORCEMENT OF FOREIGN ARBITRAL AWARDS"[12] – BY JOEL JUNKER**

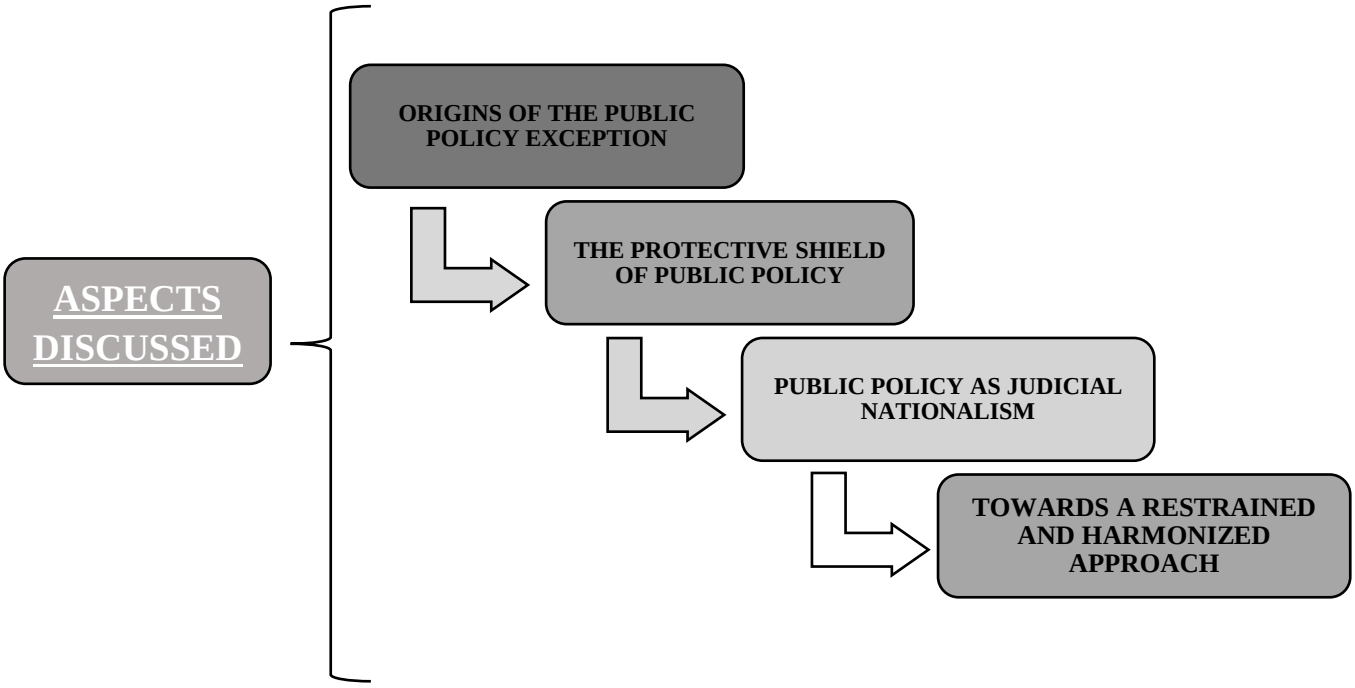
This article discusses one of the most debated grounds in the New York Convention of 1958.[13] He defines the public policy defense as a protection of sovereignty and a potential threat to arbitral enforcement because it makes awards available to be denied on unsubstantiated perceptions of justice. Following its development from the Geneva Convention of 1927[14] to the New York Convention, Junker identifies it as a "catch-all" provision. American courts, especially in Parsons' case[15], have narrowly limited the defense to instances contravening "basic notions of morality and justice." Junker criticizes the same to render the defense inoperative, with courts tending to relegate challenges to due process, non-arbitrability, or manifest disregard of law. He also points to international enforcement-local statutes tensions, such as in Scherk's case[16], under which U.S. securities protections were yielded to arbitration.

Though these observations are made, the article has gaps. It does not discuss how changing concerns such as human rights, environmental protection, or anti-corruption might transform the defense. Comparative analysis is confined, with Germany cited but no wider cross-jurisdictional snapshot. Neither does Junker address how arbitral tribunals would interact with public policy but rather concentrates on courts. Lastly, long-term implications for party autonomy, investment arbitration, and new trade regimes are not developed fully. These

[12] Joel R. Junker, The Public Policy Defense to Recognition and Enforcement of Foreign Arbitral Awards, 7 Cal. W. Int'l L.J. 228 (1977).
[13] 1958 New York Convention on Recognition and Enforcement of Foreign Arbitral Awards 330 U.N.T.S. 38 (1959); 21 U.S.T. 2517; T.I.A.S. No. 6997 (1970).
[14] 1927 Geneva Convention on the Execution of Foreign Arbitral Awards 92 L.N.T.S. 301 (1928).
[15] Parsons & Whittemore Overseas Co. v. Societe Generale De L'Industrie Du Papier [RAKTA], 508 F.2d 969, 974 (2d Cir. 1974).
[16] Scherk v. Alberto-Culver Co. 417 U.S. 506 (1974).

shortcomings indicate room for exploration in reconciling predictability in arbitration and the transforming role of public policy in a global order.

CRITICAL ANALYSIS



- **ORIGINS OF THE PUBLIC POLICY EXCEPTION -**

The public policy exception to the recognition of foreign judgments has its roots in common law doctrines of comity. The leading U.S. Supreme Court ruling in Hilton's case, initially enunciated that while foreign judgments should be accorded deference according to international comity, courts could refuse recognition if enforcement would be against the forum's "public morals or justice." This early establishment of a discretionary protection established the precedent for subsequent legal evolution.[17] Notably, Hilton's phrasing permitted broad interpretation, enabling courts to reconcile sovereignty with international cooperation.

Statutory codifications then attempted to impose structure. The Uniform Foreign Money-Judgments Recognition Act, enacted by most U.S. states, codified bases for non-recognition, including where enforcement would be "repugnant to the public policy of this state."[18] The

[17] Anil Changaroth, International Arbitration—A Consensus on Public Policy Defences, 4 Asian Int'l Arb. J. 143 (2008).
[18] Charles W. Mondora, The Public Policy Exception, the Freedom of Speech, or of the Press, and the Uniform Foreign-Country Money Judgments Recognition Act, 36 Hofstra L. Rev. 1139 (2007).

drafters noted specifically that the clause was limited, applying only to those cases of fundamental unfairness. The revised Uniform Act further restricted the language by ensuring that violations be "manifest," evidencing a legislative attempt to rein in judicial activism.

Judicial construction has also narrowed the scope. In Somportex's case, the court explained that variations in legal systems or substantive law cannot necessarily warrant refusal—public policy is left for fundamental injustices. Similarly, in Adam's case[19], it was emphasized that English courts would not deny recognition unless it would be contrary to fundamental principles of justice, and not just on the basis that foreign laws were different from English law.

Therefore, the history of the public policy exception explains its dual function: a needed protective shield for fundamental domestic values, but one in which legislatures and courts have repeatedly sought to keep within tight boundaries so as not to undermine international comity.

- **THE PROTECTIVE SHIELD OF PUBLIC POLICY -**

Although harshly criticized, the public policy exception does possess a legitimate and needed protective function. Its main purpose is to protect basic fairness, due process, and integrity of the domestic legal system.[20] For instance, in Ackermann's case[21], the Second Circuit refused to enforce portions of a German judgment owing to excessive counsel fees, on the rationale that enforcement would undermine the fairness and integrity of U.S. courts. Here, public policy has functioned as a defense—upholding faith in the rule of law by maintaining that foreign judgments are not contrary to fundamental maxims of justice.

This defensive function also appears in regulatory interest cases. In Laker's case[22], American courts defied foreign injunctions that attempted to limit domestic antitrust suits. The case highlighted how public policy protects national regulatory systems from being eroded by outside forces. Likewise, in Beals's case[23], the Supreme Court of Canada recognized that public

[19] Adams v. Cape Industries plc [1990] Ch 433 (UK).
[20] Alex Mills, The Dimensions of Public Policy in Private International Law, 4(2) J. Priv. Int'l L. 201 (2008).
[21] Ackermann v. Levine, 788 F.2d 830 (2d Cir. 1986).
[22] Laker Airways Ltd. v. Sabena, Belgian World Airlines, 731 F.2d 909, 931 (D.C. Cir. 1984)
[23] Beals v. Saldanha [2003] 3 SCR 416.

policy must be invoked sparingly but is necessary when recognition would cause a breach of fundamental justice.

Statutory backup for this role is available in the Restatement (Second) of Conflict of Laws[24], which permits non-recognition only where a judgment is "contrary to the fundamental public policy of the forum." Crucially, the bar is high: inconsistency with local law is not enough. This is to prevent abuse of the doctrine but keep it available for safeguarding values like equality, natural justice, and constitutional rights.

Thus, narrowly and cautiously applied, public policy is a shield, not a sword—a guarantee that although international decisions are obeyed, they do not undermine the underlying principles of the domestic legal order.

- **PUBLIC POLICY AS JUDICIAL NATIONALISM -**

Although in theory restrained, the public policy exception has at times been used as an alibi for judicial nationalism. Courts sometimes invoke it generally, not to safeguard basic justice, but to promote political, economic, or institutional agendas.[25] A good illustration is Overseas Inns' case[26], in which enforcement of a Luxembourg bankruptcy order was withheld principally on the grounds that it subverted U.S. tax collection policy. This kind of logic overextended public policy beyond fundamental values into the ambit of national self-interest.

Another example is in Curacao's case[27], where public policy was raised against an arbitral award in broad terms. Rather than invoking due process or procedural fairness, the opposition were hesitant to impose foreign economic measures that were considered to be inconvenient for U.S. interests.[28] The above illustrations provide an indication of how the doctrine, when exercised liberally, would be a setback to reciprocity and trust worldwide.

Legislative provisions have attempted to limit such abuse. The Uniform Foreign-Country Money Judgments Recognition Act provides that refusal is only justified where a judgment is

[24] Restatement (Second) of Conflict of Laws, 1971, §117.
[25] Sheer Abbas & Muhammad Ramzan Kasuri, Public Policy Defense to Refuse Enforcement of Foreign Arbitral Award: A Comparative Study (2020).
[26] Overseas Inns S.A. v. United States, 685 F. Supp. 968 (N.D. Tex. 1988).
[27] The Island Territory of Curacao, Appellee v. Solitron Devices Inc., 489 F.2d 1313 (2d Cir. 1973).
[28] Anupama Parameshwaran, Conflict of Laws in the Enforcement of Foreign Awards and Foreign Judgments: The Public Policy Defense and Practice in U.S. Courts (2002) (unpublished manuscript) (on file with author).

"manifestly" contrary to public policy. Likewise, the European Brussels Regulation (Recast)[29], permits refusal only on a basis of manifest incompatibility with public policy. Both regimes stress that abuse erodes credibility and causes retaliatory treatment of domestic judgments overseas.

Furthermore, foreign arbitration tribunals, as in Parsons' case, warned against blind dependence, requiring that public policy should only allow violations of the most basic tenets of morality and justice. Judicial nationalism in the form of public policy thus threatens global harmony and has the effect of reinforcing the necessity for a moderate and genuinely protective approach.

- **TOWARDS A RESTRAINED AND HARMONIZED APPROACH -**

Current trends observe a global trend towards harmonization and restriction of the public policy exception. Courts increasingly eschew expansive applications, emphasizing restraint and predictability. In Tahan's case[30], the U.S. court dismissed arguments that Israeli procedures insulted U.S. justice, explaining that procedural differences alone are not enough to stimulate public policy concerns. In a similar vein, the Indian Supreme Court in Renusagar's case[31] limited public policy to contraventions of the most basic legal and ethical principles, making a distinction between differences in substantive law and true contraventions of equity.

This shift towards restraint has also been reflected in treaty law. Article 7(1)(c) of the Hague Judgments Convention[32] limits refusal to instances where recognition would be "manifestly incompatible with the public policy of the requested state." The specific use of the word "manifestly" is in itself an indication that there is a general consensus that the doctrine needs to be kept slender, leaving little room for abuse.

Judicial consistency across borders further enhances predictability. The UK Supreme Court in Yukos' case[33] reasserted the limited ambit of the exception, and that public policy was not an excuse to re-litigate foreign judgments. Such jurisprudence resonates with international

[29] Regulation (EU) No 1215/2012 of the European Parliament and of the Council of 12 December 2012, Art. 45(1)(a).
[30] Tahan v. Hodgson, 662 F.2d 862 (D.C. Cir. 1981).
[31] Renusagar Power Co. Ltd. v. General Electric Co. AIR 1994 SC 860.
[32] Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters (HCCH 2019 Judgments Convention), Art 7(1)©.
[33] Yukos Capital Sarl v. OJSC Rosneft Oil Co. [2012] EWCA Civ 855.

sentiment that cross-border enforcement is founded on mutual trust and not unilateral nationalism.

By limiting the exception to gross abuse like denial of natural justice, discrimination, or violation of constitutional principles, the courts strike a balance between enforcing respect for comity and enforcing sovereignty.[34] Deference approach ensures that the exception is indeed a protection and not an instrument of convenience.

Finally, harmonization by way of legislative changes, treaties, and harmonious case law ensures a stable, rule-of-law environment in which public policy exceptions fulfill their intended function—protection of fundamental values with room for international legal cooperation.

CONCLUSION AND SUGGESTIONS

The defence of public policy to foreign judgment enforcement is a delicate balance between the promotion of international comity and the protection of domestic legal values. It has always been the tradition of the judiciary to maintain the public policy as a "safety valve," so that enforcement never goes beyond the elementary principles of justice, morality, or sovereignty of a legal system. But its broad interpretative scope has been over-abused, leading to unequal applications across jurisdictions. Examples of India in the case of Renusagar demonstrate the judiciary's effort to limit the defence to elementary principles of justice, while the European solutions under the Brussels Regulation and the Lugano Convention limit the exception further. This comparative approach makes it apparent that although the doctrine is unavoidable, abuse can stifle predictability in international trade. To improve, however, several things need to be done. Firstly, efforts at codification by the Hague Conference need to include a more limited definition of "public policy" that restricts it to breaches of constitutional or human rights basics and not wide socio-economic interests.

Secondly, Indian law may follow a tiered structure dividing "domestic public policy" and "international public policy," thus followed in EU law, which would minimize room for judicial nationalism. Thirdly, increased judicial training and use of comparative precedents would lead

[34] Christopher S. Gibson, Arbitration, Civilization and Public Policy: Seeking Counterpoise Between Arbitral Autonomy and the Public Policy Defense in View of Foreign Mandatory Public Law, 113 Penn St. L. Rev. 1227 (2008).

to consistency and minimize ad hoc readings. Finally, reciprocal agreements that are in line with conventions such as the Hague Choice of Court Convention can, step by step, make uniformity replace unpredictability.

In summary, public policy as a defence must continue to be an exceptional tool—a sparingly invoked protection of fundamental values, and not a standard umbrella for judicial parochialism.

REFERENCES

ARTICLES

- Karen E. Minehan, The Public Policy Exception to the Enforcement of Foreign Judgments: Necessary or Nemesis, 18 Loy. L.A. Int'l & Comp. L.J. 795 (1995).
- Joel R. Junker, The Public Policy Defense to Recognition and Enforcement of Foreign Arbitral Awards, 7 Cal. W. Int'l L.J. 228 (1977).
- Debarati Halder, *Information Technology Act and Cyber Terrorism: A Critical Review*, in *Cyber Crime and Digital Disorder* 75 (2011).
- Charles W. Mondora, The Public Policy Exception, the Freedom of Speech, or of the Press, and the Uniform Foreign-Country Money Judgments Recognition Act, 36 Hofstra L. Rev. 1139 (2007).
- Antonio F. Perez, The International Recognition of Judgments: The Debate Between Private and Public Law Solutions, 19 Berkeley J. Int'l L. 44 (2001).
- Felix D. Strebel, The Enforcement of Foreign Judgements and Foreign Public Law, 21 Loy. L.A. Int'l & Comp. L.J. 55 (1999).
- Christopher S. Gibson, Arbitration, Civilization and Public Policy: Seeking Counterpoise Between Arbitral Autonomy and the Public Policy Defense in View of Foreign Mandatory Public Law, 113 Penn St. L. Rev. 1227 (2008).
- Alex Mills, The Dimensions of Public Policy in Private International Law, 4(2) J. Priv. Int'l L. 201 (2008).
- Marussia Borm-Reid, Recognition and Enforcement of Foreign Judgments, 3(1) Int'l & Comp. L.Q. 49 (1954).
- Chimezie Onuzulike, Enforcement of Arbitral Awards: Navigating the Uncertainties of Public Policy Defence (2025).

- Anupama Parameshwaran, Conflict of Laws in the Enforcement of Foreign Awards and Foreign Judgments: The Public Policy Defense and Practice in U.S. Courts (2002) (unpublished manuscript) (on file with author).
- Sheer Abbas & Muhammad Ramzan Kasuri, Public Policy Defense to Refuse Enforcement of Foreign Arbitral Award: A Comparative Study (2020).
- Funke Adekoya, SAN, The Public Policy Defence to Enforcement of Arbitral Awards: Rising Star or Setting Sun?, 2(2) BCDR Int'l Arb. Rev. (2015).
- Anil Changaroth, International Arbitration—A Consensus on Public Policy Defences, 4 Asian Int'l Arb. J. 143 (2008).

BOOKS

- A**lex Mills**, *Party Autonomy in Private International Law* (Cambridge Univ. Press 2018).
- **K.B. Agrawal & Vandana Singh**, *Private International Law in India* (Kluwer L. Int'l 2010).

CASES

- Hilton v. Guyot, 159 U.S. 113, 164-65 (1895).
- Somportex Ltd. v. Phila. Chewing Gum Corp., 453 F.2d 435, 443 (3d Cir. 1971),' cert. denied, 405 U.S. 1017 (1972) (quoting Goodyear v. Brown, 26 A. 665, 666 (Pa. 1893)).
- Matusevitch v. Telnikof 877 F. Supp. 1 (D.D.C. 1995).
- Parsons & Whittemore Overseas Co. v. Societe Generale De L'Industrie Du Papier [RAKTA], 508 F.2d 969, 974 (2d Cir. 1974).
- Scherk v. Alberto-Culver Co. 417 U.S. 506 (1974).
- Adams v. Cape Industries plc [1990] Ch 433 (UK).
- Ackermann v. Levine, 788 F.2d 830 (2d Cir. 1986).
- Laker Airways Ltd. v. Sabena, Belgian World Airlines, 731 F.2d 909, 931 (D.C. Cir. 1984).
- Beals v. Saldanha [2003] 3 SCR 416.
- Tahan v. Hodgson, 662 F.2d 862 (D.C. Cir. 1981).
- Renusagar Power Co. Ltd. v. General Electric Co. AIR 1994 SC 860.
- Yukos Capital Sarl v. OJSC Rosneft Oil Co. [2012] EWCA Civ 855.

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CONVENTIONS & REGULATIONS

- European Communities Convention on Jurisdiction and the Enforcement of Judgments in Civil and Commercial Matters, Sept. 27, 1968, 1972 O.J. (L 299) 32, reprinted in 8 I.L.M. 229, amended by Convention on Accession to the Convention on Jurisdiction and the Enforcement of Judgments in Civil and Commercial Matters, Oct. 9, 1978, 1978 O.J. (L 304) 1, reprinted in 18 I.L.M. 21 [Brussels Convention].
- Convention on Jurisdiction and Enforcement of Judgments in Civil and Commercial Matters, 1988 O.J. (L 319) 9, reprinted in 28 I.L.M. 620 [Lugano Convention].
- Convention of 30 June 2005 on Choice of Court Agreements 44 ILM 1294 (HCCH).
- Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters (HCCH 2019 Judgments Convention).
- Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters (HCCH 2019 Judgments Convention), Art 7(1)©.
- 1958 New York Convention on Recognition and Enforcement of Foreign Arbitral Awards 330 U.N.T.S. 38 (1959); 21 U.S.T. 2517; T.I.A.S. No. 6997 (1970).
- 1927 Geneva Convention on the Execution of Foreign Arbitral Awards 92 L.N.T.S. 301 (1928).
- Regulation (EU) No 1215/2012 of the European Parliament and of the Council of 12 December 2012, Art. 45(1)(a).

STATUTES

- Uniform Foreign Money Judgments Recognition Act 13 U.L.A. 149 (1962).
- Uniform Foreign Money Judgments Recognition Act (2005).
- Restatement (Second) of Conflict of Laws, 1971, §117.