CONTENTS

Notes on contributors vii

Introduction 1
Lionel Smith

1. Reflections regarding the diversity of ways in which the trust has been received or adapted in civil law countries 6
Madeleine Cantin Cumyn

2. Recognition of common law trusts in civil law jurisdictions under the Hague Trusts Convention with particular regard to the Italian experience 29
Michele Graziadei

3. Express trusts in Israel/Palestine: a pluralist trusts regime and its history 83
Adam Hofri-Winogradow

4. Truth and reconciliation: notions of property in Louisiana’s Civil and Trust Codes 119
Michael McAuley

5. Trust laws in China: history, ambiguity and beneficiary’s rights 183
Lusina Ho

6. The French fiducie, or the chaotic awakening of a sleeping beauty 222
François Barrière

V
CONTENTS

7. The re-imagined trust  [258]
   Lionel Smith

Index  [274]