



FINAL CONFERENCE
EU Cross-Border Succession Law



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ITALIANO E SOVRANAZIONALE

EU Regulation n. 650/12

SOME ASPECTS OF SCOTS PRIVATE INTERNATIONAL LAW OF SUCCESSION

Professor Paul Beaumont and Jayne Holliday

THE PROJECT IS IMPLEMENTED BY COORDINATOR



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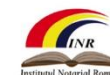
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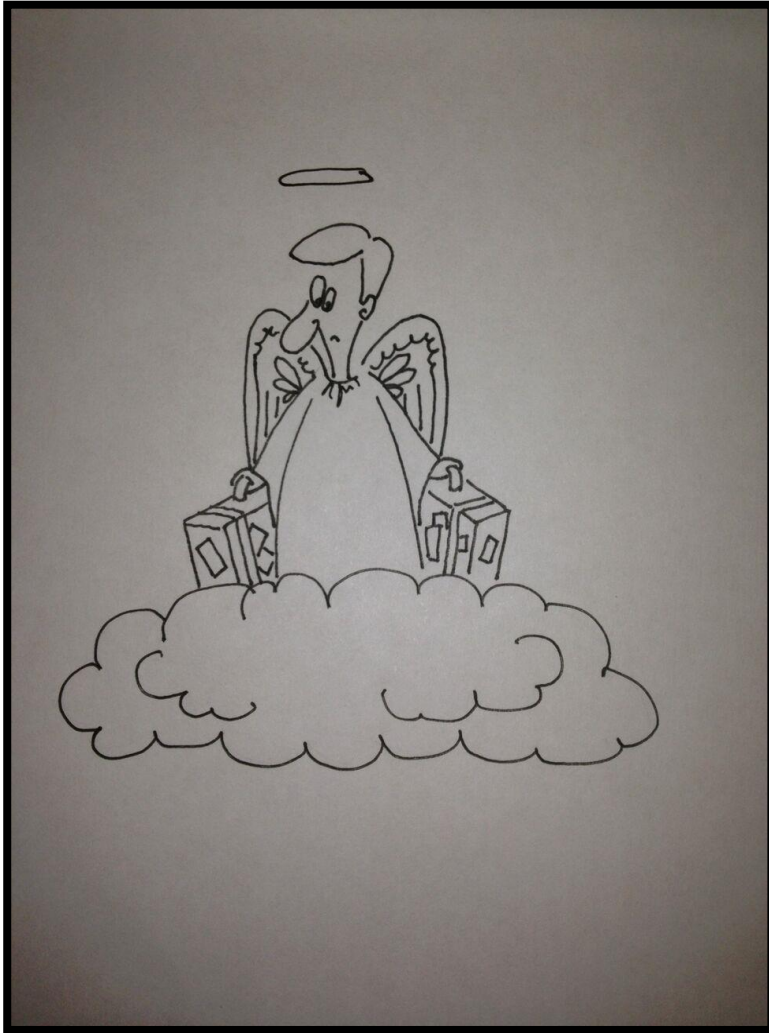
Introduction

- **Historical Background**
 - Domicile
- **The issues that prevented the UK opt in: -**
 - Habitual residence
 - Clawback
 - Administration of Estates

The Regulation and the UK National

- **Party Autonomy**
 - Choice of Law
 - Nationality
- **The UK National**
 - Habitually resident in participating Member State
- **The Member State National**
 - Evading forced heirship

So George still has problems...



**Habitual Residence
and
Clawback**

Conclusion

- **Estate Planning**

- What are the options for:-

- A UK National

- A National from another Member State

- **Conclusion**