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Insolvency close-out netting: A comparative study of English, French and US laws in a global perspective

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Insolvency Close-out Netting:

A comparative study of English, French and US laws
in a global perspective

In loving memory of my parents.

Insolvency Close-out Netting

*A comparative study of English, French and
US laws in a global perspective*

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List of Acronyms

| | |
|----------|--|
| ACPR | Autorité de contrôle prudentiel et de résolution (France) |
| BAPCPA | Bankruptcy Abuse Prevention and Consumer Protection Act (US) |
| BCBS | Basel Committee on Banking Supervision |
| BIS | Bank for International Settlements |
| Brexit | Exit of the United Kingdom from the EU |
| BRRD | Bank Recovery and Resolution Directive (EU) |
| CPSS | Committee on Payment and Securities Systems (BIS) |
| DIP | Debtor-in-possession (US) |
| EACB | European Association of Cooperative Banks |
| EBA | European Banking Authority (EU) |
| EBF | European Banking Federation |
| EMA | European Master Agreement |
| ESBG | European Savings Bank Group |
| EU | European Union |
| FCAR | Financial Collateral Arrangements (No. 2) Regulations (UK) |
| FCD | Financial Collateral Directive (EU) |
| FDIA | Federal Deposit Insurance Act (US) |
| FDIC | Federal Deposit Insurance Corporation (US) |
| FDICIA | Federal Deposit Insurance Corporation Improvement Act (US) |
| FSB | Financial Stability Board |
| GMRA | Global Master Repurchase Agreement |
| IATA | International Air Transport Association |
| IBA | International Bar Association |
| ICMA | International Capital Markets Association |
| ISDA | International Securities and Derivatives Association, Inc. |
| IMF | International Monetary Fund |
| Intro | Introduction |
| OLA | Orderly Liquidation Authority (US) |
| OTC | Over-the-Counter |
| QFC | Qualified Financial Contract (US) |
| SFD | Settlement Finality Directive (EU) |
| SIFI | Systemically Important Financial Institution |
| Sifma | Securities Industry and Financial Markets Association |
| SRB | Single Resolution Board (EU) |
| SRM | Single Resolution Mechanism (EU) |
| SSM | Single Supervisory Mechanism (EU) |
| INSOL | Association of International Insolvency Practitioners |
| UK | United Kingdom |
| UNCITRAL | United Nations Commission on International Trade Law |
| UNIDROIT | International Institute for the Unification of Private Law |
| US | United States |
| USC | United States Code |

