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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

