

## Intellectual property in common law and civil law

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### Abstrak

Despite increasing worldwide harmonization of intellectual property, driven by US patent reform and various EU Directives, the common law and civil law traditions still exert powerful and divergent influences on certain features of national IP systems. Drawing together the views and experiences of scholars and lawyers from the United States, Europe and Asia, this book examines how different characteristics embedded in national IP systems stem from differences in the fundamental legal principles of the two traditions.