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Seizure and freezing orders

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Seizure and freezing orders

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Seizure and freezing orders

1. Introduction

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Seizure and freezing orders

The origins

- Seizure: a French tool (*saisie-contrefaçon*), existing also in Belgium, Italy and Spain.
- *Ex-parte* injunction: a German and Spanish specificity

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EC Directive

- Directive 2004/48/EC of 29 April 2004 on the enforcement of intellectual property rights
 - ▶ Article 7: “Measures for preserving evidence”
 - ▶ Article 9: “Provisional and precautionary measures”

Effects of the Directive

- The Directive is not directly applicable, if not implemented. However, national laws must be interpreted in the light of the directive
- Therefore, it is necessary to check in each country whether and how the Directive has been implemented

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Implementation of the Directive

The map shows the following implementation details for various European countries:

- United Kingdom:** April 29, 2006. No amendment to the prior existing provisions.
- Benelux (Belgium, Netherlands, Luxembourg):** National level: May 1, 2007; Kingdom level: July 1, 2006; Benelux level: February 1, 2007.
- France:** October 29, 2007 Act; June 27, 2008 Decree.
- Spain:** June 6, 2006 Act, (19/2006).
- Italy:** Decree of March 16, 2006 n° 140 in force since April 22, 2006.
- Other countries (Austria, Germany, Greece, Ireland, Portugal, Slovakia, Slovenia, Sweden, Switzerland):** September 1, 2008.

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2. Seizure

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Article 7 of the Directive: measures for preserving evidence

"1. Member States shall ensure that, even before the commencement of proceedings on the merits of the case, the competent judicial authorities may, on application by a party who has presented reasonably available evidence to support his/her claims that his/her intellectual property right has been infringed or is about to be infringed, order prompt and effective provisional measures to preserve relevant evidence in respect of the alleged infringement, subject to the protection of confidential information. Such measures may include the detailed description, with or without the taking of samples, or the physical seizure of the infringing goods, and, in appropriate cases, the materials and implements used in the production and/or distribution of these goods and the documents relating thereto. Those measures shall be taken, if necessary without the other party having been heard, in particular where any delay is likely to cause irreparable harm to the rightholder or where there is a demonstrable risk of evidence being destroyed.

Where measures to preserve evidence are adopted without the other party having been heard, the parties affected shall be given notice, without delay after the execution of the measures at the latest. A review, including a right to be heard, shall take place upon request of the parties affected with a view to deciding, within a reasonable period after the notification of the measures, whether the measures shall be modified, revoked or confirmed.

Article 7 of the Directive: measures for preserving evidence

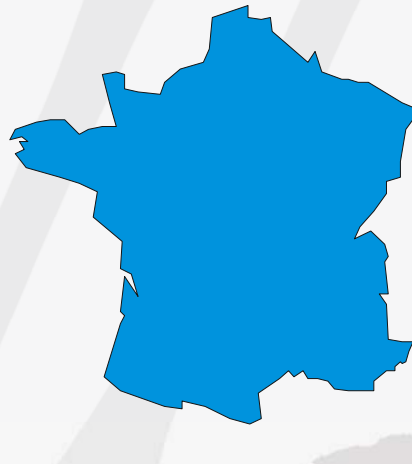
- 2. Member States shall ensure that the measures to preserve evidence may be subject to the lodging by the applicant of adequate security or an equivalent assurance intended to ensure compensation for any prejudice suffered by the defendant as provided for in paragraph 4.*
- 3. Member States shall ensure that the measures to preserve evidence are revoked or otherwise cease to have effect, upon request of the defendant, without prejudice to the damages which may be claimed, if the applicant does not institute, within a reasonable period, proceedings leading to a decision on the merits of the case before the competent judicial authority, the period to be determined by the judicial authority ordering the measures where the law of a Member State so permits or, in the absence of such determination, within a period not exceeding 20 working days or 31 calendar days, whichever is the longer.*

Article 7 of the Directive: measures for preserving evidence

4. *Where the measures to preserve evidence are revoked, or where they lapse due to any act or omission by the applicant, or where it is subsequently found that there has been no infringement or threat of infringement of an intellectual property right, the judicial authorities shall have the authority to order the applicant, upon request of the defendant, to provide the defendant appropriate compensation for any injury caused by those measures.*
5. *Member States may take measures to protect witnesses' identity. "*



2.1 France





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Late but not the last one!


Directive 2004/48/EC
implemented in France on

October 29, 2007

(Act n° 2007-1544,
French Official Journal n° 252 of 30 October 2007)
(Decree of June 27, 2008)

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**Limited impact of Article 7 of the
Directive in France**

- *Saisie-contrefaçon* is a long tradition in France
- The Directive entailed minor changes

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A daily practice in France

- The most efficient way to gather evidence of infringement
 - ▶ used in 80% of infringement actions
 - ▶ 600 *saisies* ordered each year by the sole Court of Paris (probably 1500 in France each year) for all IP matters




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The *saisie-contrefaçon* in a nutshell



- The *saisie* is a way to gather evidence of infringement, not a preliminary injunction
- Upon authorization granted *ex-parte*, a bailiff assisted by experts chosen by the claimant may enter any premises where proof of infringement might be found to perform the authorized investigations
- The report handed to the claimant is later exhibited to the Court

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A *saisie* can be performed on the basis of almost all IP rights




- Patent (Art. L. 615-5 French Intellectual Property Code)
- Trademark (Art. L. 716-7 French Intellectual Property Code)
- Design (Art. L. 521-4 French Intellectual Property Code)
- Copyright
- NEW :
 - ▶ Topography of a semi-conductor product (Art. L. 622-7 French Intellectual Property Code)
 - ▶ Geographical indications (Art. L. 722-4 French Intellectual Property Code)
 - ▶ Databases (Art. L.343-1 French Intellectual Property Code)




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For patents Article L. 615-5 Intellectual Property Code



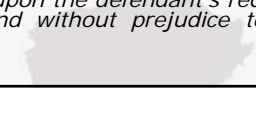
"The infringement shall be proven by any means.

For that purpose, any person with authority to bring an action for infringement shall be entitled, on the order issued upon request by the competent civil court, to direct any bailiff, accompanied by experts appointed by the claimant, to proceed in any place with either the detailed description, with or without taking samples, or the effective seizure of the allegedly infringing articles or processes as well as any related document.

The court shall order, for the same evidential purposes, the effective seizure of equipment and tools used to manufacture or distribute the goods or to implement the allegedly infringing processes.



It may condition the implementation of the measures it ordered to the furnishing by the claimant of security to ensure, if necessary, the defendant's compensation if the infringement action is subsequently held unfounded or the seizure is cancelled.

If the claimant fails to institute legal proceedings on the merits, either by civil action or criminal action, within a period of time set by regulation, the entire seizure, including the description, shall be void upon the defendant's request, without its having to motivate its request and without prejudice to the damages which may be claimed."



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The grant of the order: an *ex-parte* procedure

- The *saisie* must be authorized by the President of the local Court of first instance
- The petition is filed by the plaintiff's attorney-at-law
- The defendant is not informed of the petition, he is informed only upon performance of the *saisie*

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The grant of the order: a right for the owner

- The Judge **must** grant the order, if the claimant proves to be the owner of a title in force
- No preliminary evidence required under French law
 - ▶ EC enforcement Directive 2004/48 allows, but does not oblige, to require reasonably available evidence to support the request
- Judge can only:
 - ▶ restrict the terms of the petition
 - ▶ order the petitioner to a security or a bond

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Practical tips

- The aim of the *saisie* is to gather evidence, not to look for evidence
- It is vital to identify **before** the *saisie* information and documents needed to demonstrate infringement including origin and extent

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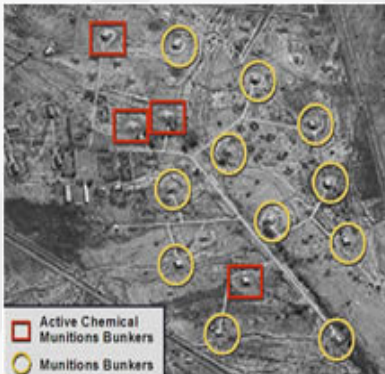
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Identification of the targets

- Manufacturing plants
- Places of storage
- Points of exhibition, of sale
- Hospitals
- Administrative bodies (AFSSAPS)
- Customs
- Accounting data




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Simultaneous *saisies*


- It is sometimes necessary to perform simultaneous *saisies* (company headquarters, plants, suppliers, sellers...)
- Thus, it is essential to coordinate the *saisies* to keep the surprise

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Who conducts the *saisie*?


- The *saisie* is performed by a *huissier*, a public officer (bailiff)

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Who may take part to the *saisie*?


- An expert may help the bailiff to describe the infringing device
 - ▶ independent from the parties
 - ▶ generally a patent attorney
- Case law on the expert authorized to assist the bailiff in view of article 6 of ECHR on the right to a fair trial:
 - ▶ *Cour de Cassation*, July 6, 2000 (software): the employee of the plaintiff is not independent and is therefore not allowed to assist the bailiff
 - ▶ *Cour de Cassation*, March 8, 2005 (trademark): the trademark attorney (*conseil en propriété industrielle*) is considered as independent from his client and can therefore assist the bailiff

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Who may take part to the *saisie*?

- A police officer (or squad if appropriate)
- Any other person whose technical skills may be useful: a photograph, a computer expert, a locksmith, an accountant...
- To perform a *saisie* in a hospital a representative of the medical doctors official association (in case access to individual medical data is required)


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Evidence to be gathered




- Description and photographs of the accused device
- Copy of technical and commercial documents and accounting data
- Copy of program software




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Physical seizure



- Seizure of samples (to be paid according to the defendant's price list)
- Seizure of equipment and tools to manufacture or distribute the products or to implement the accused processes is allowed
- Seizure of the stocks: possible for trademarks, not for patents

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Confidentiality issues

- The defendant may ask the bailiff to place confidential documents in a sealed envelop
- The Court usually appoints an expert to sort out:
 - ▶ documents (even confidential) useful to prove the infringement which are handed over to the claimant
 - ▶ documents not related to the infringement


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The aftermath : the plaintiff has to start an action



- The plaintiff has to start proceedings within 20 working days or 31 calendar days if longer
- Otherwise: the whole *saisie* is invalid

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**The aftermath:
the validity of the *saisie* is often disputed**

- The defendant often challenges :
 - ▶ the grant of the order
 - ▶ the validity of the *saisie*
- Courts are increasingly (and exaggeratedly?) strict

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Seizure and freezing orders

2.2 Germany



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**Directive 2004/48/EC
implemented in Germany on**

September 1, 2008

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**Before the implementation
of 2004/48/EC Directive**

- Faxkarte case (May 2002, German Federal Supreme Court):
 - ▶ a certain likelihood of infringement was sufficient for allowing an inspection of products or devices on the basis of § 809 of the German civil code (BGB)
 - ▶ intervention on the substance of the product could be allowed even if it destroys or impairs the product
- Since 2002, the regional Court of Düsseldorf developed inspection procedures on the basis of § 809 BGB and the Faxkarte case
- The inspection procedures combined independent proceedings for the preservation of evidence (§ 485 et seq of the ZPO, the German Code on civil procedure) with a preliminary Court order (§ 935 et seq of the ZPO)

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Now

- § 140c of the German patent Act Protection of confidential information
- Still applied by means of § 485 et seq and 935 et seq ZPO

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§ 140c of the German patent Act (1/2)

- *Ex-parte* proceedings
- The claimant has to show an adequate likelihood of infringement based on facts, such as:
 - ▶ visible features or effects implying presence of invisible features,
 - ▶ infringement abroad

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§ 140c of the German patent Act (2/2)

- Principle of proportionality and subsidiarity:
 - ▶ risk that the product or process can be destroyed
 - ▶ infringing product not available on the market yet
 - ▶ intervention on the substance of the product has to be balanced against the likelihood of infringement
- Protection of confidential information

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Access to the gathered evidence

- In case of confidentiality issues raised by the defendant
- The Court will authorize the access of the plaintiff only to evidence proving infringement

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2.3 The Netherlands



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Directive 2004/48/EC implemented in the Netherlands on

May 1, 2007

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Dutch directive implementation

- Article 7 of the Directive was implemented at the national level in Art. 1019b-d of the Dutch Code of Civil Procedure
- *Saisie* did not exist before
- Creation of a new evidence gathering procedure

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Requirements of the gathering new evidence procedure

- *Ex-parte* proceedings
- The claimant must show a sufficient likelihood of infringement or threat of infringement:
 - ▶ mere speculation of infringement is not sufficient
- He must specify the sought information
- As in Germany, proportionality and subsidiarity

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Two-stage evidence collection procedures

- 1. Preservation of evidence:
 - ▶ the Court application / order provides that evidence is put into custody
- 2. Access to evidence:
 - ▶ in the infringement action, the plaintiff requests access to the evidence:
 - ▶ immediate access for elements proving infringement
 - ▶ access only after a victory on the merits for commercial and accounting data

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2.4 England and Wales



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**Directive 2004/48/EC
implemented in England and Wales on**


29 April 2006

(“The Intellectual Property (Enforcement, etc.) Regulations 2006”,
which is a Statutory Instrument (2006 n° 1028))

- The Regulations made some minor changes to the English Civil Procedure Rules and the main intellectual property statutes.

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**Existing provisions considered as sufficient by
the UK: Anton Piller orders (1/3)**

- Section 7 of the Civil Procedure Act 1997
(Anton Piller orders):
 - ▶ *ex-parte* proceedings
 - ▶ it is possible for a supervising solicitor to inspect the defendant’s premises and to seize, copy or photograph material relevant to the alleged infringement

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Existing provisions considered as sufficient by the UK: Anton Piller orders (2/3)

- Especially used in piracy
- The plaintiff must:
 - ▶ provide clear evidence that the defendant has incriminating documents or things which are likely to be destroyed before any application *inter partes* can be made
 - ▶ provide an extremely strong *prima facie* case of infringement
 - ▶ show that the damage to him is very serious
 - ▶ prove that the order is not excessive in comparison with the harm caused




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Existing provisions considered as sufficient by the UK: Anton Piller orders (3/3)

- The measure is only ever ordered *ex-parte*
- The right holder must commit:
 - ▶ to compensate the defendant for any damage that may be caused by the search
 - ▶ to start proceedings on the merits as soon as practicable



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2.5 Italy



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Directive 2004/48/EC implemented in Italy on


16 March 2006

(legislative decree no. 140,
in force since 22 April 2006)

- This decree modifies both the Intellectual Property Code and Copyright Law

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Descrizione proceedings

- *Descrizione* procedure, similar to *saisie*, already existed
- Almost no change made in relation to implementation of article 7 of the Enforcement Directive
- This procedure was only extended to copyright law

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Italian Descrizione

- The right holder can request the President of the specialized court to order the description of the accused goods, the means to manufacture said goods and gather evidence of the infringement
- The order lists:
 - ▶ the measures that can be performed, and
 - ▶ the measures to be adopted to protect confidential information
- The order can be granted *ex parte*
- If authorized before an action on the merits has been initiated, the order sets a time period within which the action must be initiated

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2.6 Spain



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Directive 2004/48/EC implemented in Spain on


6 June 2006

(Spanish Act 19/2006)

- No change for description proceedings
- But a major change regarding proceedings to obtain information

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Description proceedings

- Description procedure already existed in the patent act
- This procedure was already applied to all IP rights (except copyright)
- This procedure proved to be quick and efficient

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New

- Before the Directive implementation, the description procedure gave access both to infringement evidence and commercial and financial information
- Now, the description procedure is reserved to infringement evidence
- Now, commercial and financial information can be obtained only through information procedure

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Need for preliminary evidence

- The right holder can request the competent commercial Court to order the description of the accused goods, the copy of documents, the seizure of manufacturing tools and means
- The right holder must prove:
 - ▶ that he has reasons to suspect the possibility of infringement
 - ▶ and that he has no other way to prove infringement
- The order is granted *ex parte*



Major role of the Court

- The measure is performed by a Court appointed bailiff accompanied by a Court appointed expert
- The expert files a report before the Court
- The Court decides whether the report should be given to the right holder
- In the affirmative, the action must be initiated within two months from the *saisie*

3. Freezing orders

Article 9 of the Directive

5. *Member States shall ensure that the provisional measures referred to in paragraphs 1 and 2 are revoked or otherwise cease to have effect, upon request of the defendant, if the applicant does not institute, within a reasonable period, proceedings leading to a decision on the merits of the case before the competent judicial authority, the period to be determined by the judicial authority ordering the measures where the law of a Member State so permits or, in the absence of such determination, within a period not exceeding 20 working days or 31 calendar days, whichever is the longer.*
6. *The competent judicial authorities may make the provisional measures referred to in paragraphs 1 and 2 subject to the lodging by the applicant of adequate security or an equivalent assurance intended to ensure compensation for any prejudice suffered by the defendant as provided for in paragraph 7.*
7. *Where the provisional measures are revoked or where they lapse due to any act or omission by the applicant, or where it is subsequently found that there has been no infringement or threat of infringement of an intellectual property right, the judicial authorities shall have the authority to order the applicant, upon request of the defendant, to provide the defendant appropriate compensation for any injury caused by those measures.*

3.1. Countries having *ex-parte* injunction in the past

- Germany
- Spain



Germany: the reference for *ex-parte* injunctions

- Germany provided for *ex-parte* injunctions proceedings prior to the Directive
 - ▶ in suitable cases, such injunction can be reached within hours after filing
- It teaches the antidote, i.e. the *Schutzschrift*



Spain: *ex-parte* injunctions possible since 1986, even for copyright

- ▶ Same requirements as for a classical preliminary injunction:
 - ▶ *prima facie* evidence of infringement
 - ▶ urgency
- ▶ Plus: serious and imminent damage in the absence of immediate injunction
- ▶ NB: defences based on patent invalidity are rarely successful

3.2 Countries discovering *ex-parte* injunctions

- France
- England and Wales
- The Netherlands
- Italy




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France



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Before the Directive implementation

- No possibility of *ex-parte* injunction
- Preliminary injunctions possible only for patent and trademark cases, in very restrictive conditions:
 - ▶ an action on the merits had been launched within less than 6 months from the date at which the plaintiff had been, or should have been, aware of the alleged infringement
 - ▶ the action on the merits is likely to succeed, i.e. the defendant has no serious defence.

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After the October 2007 Act

- Provisional measures are possible for patents, trademarks and designs, but not for copyright
- The new requirements for *inter-partes* preliminary injunctions are less demanding
- *Ex-parte* injunctions become possible

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Possible provisional measures

- Courts may order:
 - ▶ injunction under penalty
 - ▶ continuation combined with a bond or a security by the defendant
 - ▶ the remittance to a third person of the infringing products to prevent their circulation in the channels of commerce

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New requirements for *inter-partes* preliminary injunction in France (1/2)

- Preliminary injunction can be requested before any proceedings on the merits
- There is no more time limit between the date at which the plaintiff is aware of the alleged infringement and the infringement claim
- A preliminary injunction can be granted before any effective infringement, when infringement is about to be committed

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New requirements for *inter-partes* preliminary injunction in France (2/2)

- Sole condition: evidence reasonably accessible to the claimant makes it likely that:
 - ▶ his rights are infringed
 - ▶ or that such infringement is about to be committed

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Additional requirements for new *ex-parte* injunction

- Urgency
- Circumstances requiring *ex-parte* proceedings, notably when delay would cause irreparable harm to the plaintiff

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French case law about *ex-parte* injunction

- Granted in a design and trademark case, by the Paris *Tribunal de grande instance*, on November 7, 2007
- However, remains reserved to exceptional cases

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Importation in France of German "*Schutzschriften*"

- Raises some difficulties
- After an *ex-parte* injunction: possible to request the withdrawal of the order

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Another type of provisional measures: the precautionary seizure

- ▶ The precautionary seizure of the alleged infringer's movable or immovable assets, including the blocking of the bank accounts and other assets.
 - ▶ The claimant must prove that circumstances are likely to compromise the payment of damages.
 - ▶ This provision is largely inspired by the English provision on freezing orders.

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The Netherlands



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The Dutch *ex-parte* injunctions

- Since May 1, 2007, Court may grant an *ex-parte* injunctions
- However, Dutch Courts are reluctant
- There is still a relatively cost-efficient and speedy form of preliminary relief proceedings (*kort geding*)

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Importation of German "Schutzschriften" in the Netherlands

- German "*Schutzschriften*" have been imported to the Netherlands
- They can be sent by e-mail to the Judge.

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