EU Private International Law in Family and Succession Matters: The Hungarian Judicial Practice

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This article is based on the Hungarian strand of the multiyear CEPIL project ("Cross-Border Litigation in Central-Europe: EU Private International Law before National Courts") carried out with the generous support of the European Commission Directorate General Justice and Consumers. One of the leading considerations behind the CEPIL project was that the value of private international law (PIL) unification can be preserved only if EU private international law (EU PIL) instruments are applied correctly and uniformly, hence, the European endeavors in the field should not and cannot stop at statutory unification but need to embrace the judicial practice and make sure that besides the vertical communication between the CJEU and national courts, there is also a horizontal communication between national courts, authorities and the legal community in general. The purpose of this publication is to contribute to this horizontal communication between Member State courts by providing an analytical insight into the Hungarian case-law on EU PIL instruments in family and succession matters.

Keywords: Brussels II Regulation, Brussels IIa Regulation, EU Private International Law, Maintenance Regulation, International Family Law, International Succession Law, Matrimonial Property Regulation, Regulation on the Property Consequences of Registered Partnerships, Rome III Regulation, Succession Regulation

1. Introduction

This article is based on the Hungarian strand of the multiyear CEPIL project ("Cross-Border Litigation in Central-Europe: EU Private International Law before National Courts") carried out with the generous support of the European Commission Directorate General Justice and Consumers.[1] One of the leading considerations behind the CEPIL project was that the value of private international law (PIL) unification can be preserved only if EU private international law (EU PIL) instruments are applied correctly and uniformly, hence, the European endeavors in the field should not and cannot stop at statutory unification but need to embrace the judicial practice and make sure that besides the vertical communication between the CJEU and national courts, there is also a horizontal communication between national courts, authorities and the legal community in general. The purpose of this publication is to contribute to this horizontal communication between Member State courts by providing an analytical insight into the Hungarian case-law on EU PIL instruments in

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family and succession matters.[2]

2. Judicial practice in family law matters having a cross-border element

The survey produced 55 Hungarian cases where a reference was made to the Brussels IIa Regulation[3] and 14 cases where the Maintenance Regulation[4] was applied. 2 cases were found concerning the Rome III Regulation,[5] however, no substantive issue emerged in these.[6] Hungary does not take part in the enhanced cooperation concerning the Matrimonial Property Regulation[7] and the Regulation on the Property Consequences of Registered Partnerships.[8]

2.1. Jurisdiction and recognition and enforcement in matters concerning the dissolution of the marital bond and parental responsibility: application of the Brussels IIa Regulation

The survey produced 55 Hungarian cases where a reference was made to the Brussels IIa Regulation. In two thirds of these cases (37 matters) no substantive issue of interpretation emerged.

2.1.1. Scope of application

Under Hungarian law, a significant part of family law issues related to children, such as certain issues related to the exercise of access rights, are handled by the Guardianship and Child Protection Office ("gyámhivatal").

In Case *Pfv.II.20.622/2009*,[9] the Supreme Court established that as the competences concerning access rights are split between the court and the Guardianship and Child Protection Office, the latter has to be regarded as a "court" from the perspective of the Brussels IIa Regulation.

In Case *Kfv.II.39.412/2007/12*,[10] the plaintiff claimed compensation for the travel costs incurred when exercising his visitation rights in the time-frame set out by the court, because the other parent failed to inform him that she moved with the child to Germany and, hence, they could no longer be reached at the earlier address. The Supreme Court held that the claim of reimbursement for the failed visitation came under the scope of the Brussels IIa Regulation. The Court, referring to Articles 1(1)(b) and 2(a) of Brussels IIa Regulation, pointed out that the Regulation also applied to the exercise of the right of access and the claim of reimbursement for the failed visitation was part of the exercise of the plaintiff's rights of access.

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[2] In this article, Brussels I Regulation refers both to the 2001 Brussels I Regulation (Council Regulation 44/2001, *OJ* 2001 L 12/1.) and the 2012 Brussels II Regulation (Regulation 1215/2012, OJ 2012 L 351/1.) jointly and, if not specified otherwise, article numbers refer to the 2012 Brussels I Regulation.

[3] Council Regulation 2201/2003, OJ 2003 L 338/1.

[4] Regulation 4/2009, OJ 2009 L 7/1.

[5] Council Regulation 1259/2010, OJ 2010 L 343/10.

[6] Case Pf.634936/2019/12 (Budapest-Capital Regional Court), appealed from Case P.101627/2017/112 (Central District Court of Pest); Case Pfv.21582/2019/4 (Supreme Court), appealed from Case Pf.21234/2018/20 (Szolnok Regional Court), appealed from Case P.20663/2017/5 (Jászberény Local Court).

[7] Council Regulation 2016/1103, OJ 2016 L 183/1.

[8] Council Regulation 2016/1104, OJ 2016 L 183/30.

[9] Reported as BH 2009.10.298 and EH 2009.1961.

[10] Appealed from Case K.21134/2007/8 (Nyíregyháza Regional Court).

Hungarian courts have been reluctant to apply the Brussels IIa Regulation to matters having a significant non-EU element.

In Case *Pfv.II.21.847/2014*,[11] the Supreme Court had to decide whether the Brussels IIa Regulation applied to a matter with a significant non-EU element. The plaintiff was a Hungarian and the defendant a French citizen. The plaintiff requested the court to dissolve their marriage concluded in Paris, to place their child born in Tokyo to her (a French-Hungarian dual citizen) and to award maintenance. Before the opening of the Hungarian procedure, the defendant launched divorce proceedings in Bora Bora (French Polynesia), where the parties allegedly lived at the time the procedure was launched. While the case centered around the consequences of the Polynesian proceedings in terms of *lis pendens*, the Supreme Court also examined the applicability of the Brussels IIa Regulation's jurisdictional rules and established, in a summary manner, that they did not apply, since French Polynesia did not come under the Regulation's scope of application. Unfortunately, the Supreme Court supported its stance with no detailed analysis, although this construction seems to go counter to Article 6 of the Brussels IIa Regulation. This provides that a spouse who is habitually resident or a national of a Member State can be sued only in accordance with the Regulation's jurisdictional rules ("may be sued in another Member State only in accordance with Articles 3, 4 and 5").

As noted above, the reluctance to apply an EU PIL instrument to a matter with a significant non-EU element is not novel in the Hungarian case law. In Case *G.20348/2013/83*, the Győr Regional Court indicated that the Rome I Regulation did not apply in a case where one of the contracting parties was Austrian but the other one was from the Cayman Islands, although Article 2 of the Rome I Regulation provides for universal application.

2.1.2. Jurisdictional and related procedural issues

In the Hungarian judicial practice, habitual residence, as one of the central concepts of the Brussels IIa Regulation's jurisdictional rules, is treated as a fact-intensive issue and is analyzed on a case-by-case basis. Courts interpret this concept uniformly in the various legal instruments (Brussels IIa Regulation, Hague conventions and domestic law). As to the child's habitual residence, courts do not attribute primary relevance to the length of the stay but, instead, take into consideration the parents' decision and common will.[12]

In Case *Pfv.II.20.123/2015*,[13] the Supreme Court established that if the parties move with the child to another country for a long period of time, though without the intention to settle, and sell their movables in Hungary and rent out their real estate for an indefinite duration, the child's habitual residence changes.

In Case *Pfv.II.20.910/2011*,[14] the Supreme Court held that the child's place of habitual residence does not shift to Hungary, if the parents consider their employment here as provisional and maintain their habitual residence in the other country.

In Case *Pfv.II.21.710/2013*,[15] the Supreme Court examined the requirements against a choice-of-court agreement as set out in Article 12(3) of the Brussels IIa Regulation. It noted that during the

[11] Reported as BH+ 2016.1.26.

[12] See Case reported as BH 2014/180.

[13] Reported as BH+ 2015.11.465.

[14] Reported as EH 2011.2318.

[15] Reported as BH+ 2014.8.352.

first instance procedure (where the court rejected the parties' motion) the child's interests would have been best served, if the first instance court had tried the case and decided on the placement of the child, since at that time all interested parties were staying in Hungary. The court of first instance, misinterpreting Article 12(3) of the Brussels IIa Regulation, erred when it declined jurisdiction and terminated the procedure. However, due to the change of circumstances, this flawed decision could not be rectified.

In Case *Pfv.II.20.622/2009*,[16] the Supreme Court interpreted Article 9(1) of the Brussels IIa Regulation in an idiosyncratic manner. Article 9(1) provides that if the child moves lawfully to another Member State, the courts of the previous habitual residence retain jurisdiction "during a three-month period *following the move* for the purpose of modifying a judgment on access rights issued in that Member State before the child moved,"[17] provided the holder of access rights remains in this country. While the statutory language of Article 9(1) suggests that the starting date of the three-month period is the day of the actual move, as *obiter dicta*, the Supreme Court indicated, in a case where the Hungarian court authorized the child's move from Hungary to Italy (i.e. the change of the habitual residence), that the three-month period starts running from the date of the judgment authorizing the move.

Article 11(2) of the Brussels IIa Regulation requires the court to ensure "that the child is given the opportunity to be heard during the proceedings unless this appears inappropriate having regard to his or her age or degree of maturity." The Supreme Court has consistently held that the court does not have to hear the child via a psychologist but may hear him directly and assesses whether the child's declarations should be taken into consideration having regard to his age and degree of maturity.[18]

In Case *Pfv.II.20.769/2013*,[19] the Supreme Court rejected the plaintiff's allegation of jurisdiction based on appearance, because the defendant objected to the jurisdiction of Hungarian courts right in his first submission after the delivery of the statement of claim and at numerous occasions thereafter.

In Case *Pfv.II.22.073/2009*,[20] the Supreme Court established that the defendant implicitly accepted the jurisdiction of Hungarian courts when he made submissions as to the merits of the case and beforehand requested the transfer of the case to another Hungarian court (from the court of the child's habitual residence to the court of his last Hungarian place of living). With his objection to the venue of the court and indication of another court, the defendant accepted, tacitly but unequivocally, the jurisdiction of Hungarian courts, since the question of venue emerges only if Hungarian courts have jurisdiction at all. The defendant accepted the jurisdiction of Hungarian courts also when he declared that he was willing to enter into a settlement in accordance with the psychologist's opinion, provided it was not obviously flawed or abusive. The Supreme Court considered that the foregoing two declarations implied that the defendant accepted the jurisdiction of Hungarian courts and this also served the best interests of the child.

In Case *Pfv. II. 20.936/2019*,[21] the Supreme Court interpreted Article 15 of the Brussels IIa Regulation, which authorizes the court to transfer the case to a court of another Member State, if the

[16] Reported as BH 2009.10.298 and EH 2009.1961.

[17] Emphasis added.

[18] Case *Pfv.21601/2009/5* (Supreme Court), reported as BH 2010.5.123; Case *Pfv.II.20.461/2013* (Supreme Court), reported as BH 2014.3.80; Case *Pfv.II.20.461/2013* (Supreme Court), reported as BH 2014.3.80.

[19] Reported as BH 2013.12.344.

[20] Reported as EH 2010.2141.

[21] Reported as BH 2020.2.43.

latter is better placed to hear the case. According to the Supreme Court, Article 15 sets out three conjunctive conditions: the paramount interests of the child, a close link to the other Member State and that the other court be better placed to entertain the case.[22] The close link to the other Member State is defined by Article 15(3) of the Regulation in a detailed manner, however, the other two considerations come under the court's discretion and have to be assessed in light of the purposes of the Regulation.[23] A court is better placed if the transfer of the cases could have a real and specific added value. The rules of procedure of the other court may be taken into account but not its substantive law.[24] The Supreme Court affirmed the lower court's decision that in this case the transfer of the case to the courts of the child's habitual residence was justified, as the German court was better placed to explore the circumstances of the child, such as the place of living, school, out-of-school activities, and had better access the pertinent evidence (witnesses, deeds).[25] The Supreme Court also stressed that the assessment is based exclusively on the interests of the child and the interests of the parents play no role here.[26]

Hungarian courts have consistently held that the Brussels IIa Regulation narrowed the possibility to refuse to return the child. According to Article 11(4) of the Regulation, "[a] court cannot refuse to return a child on the basis of Article 13b of the 1980 Hague Convention if it is established that adequate arrangements have been made to secure the protection of the child after his or her return." The 1980 Hague Convention establishes a presumption that the child's interests are best served, if he is forthwith returned to the place of habitual residence. This presumption is reinforced by the Brussels IIa Regulation and can be rebutted only in exceptional cases, if justified by the individual circumstances. The burden of proof rests on the plaintiff. This was confirmed by the Supreme Court in Case *Pfv.II.22.039/2016/7*,[27] in Case *Pfv.II.20.703/2018/3*[28] and Case *Pfv.II.21.124/2018/10*[29].

2.1.3. Recognition and enforcement

In Case *Pfv.II.21.380/2010*,[30] the Supreme Court established that the recognition and enforcement of a judgment rendered in another Member State as to parental responsibility cannot be rejected merely because the enforcement of a Hungarian judgment concerning the child's abduction is pending.

In Case *Pfv.II.21.068/2013*,[31] the Supreme Court held that the recognition and enforcement of a judgment rendered in another Member State cannot be rejected, if the possibility to hear the child was ensured, although this did not work out, because the party concerned obstructed it. In this case the Belgian court established: while the date of the hearing was carefully selected, the party did not ensure the child's appearance before the court and tried to justify this with a doctor's certifi-

[22] Ibid. para. 20.

[23] Ibid. paras. 21 and 26.

[24] Ibid. para. 28.

[25] Ibid. paras. 29-35.

[26] Ibid. para. 36.

[27] Ibid. para. 27. Appealed from Case 50.Pkf.635.636/2016/2 (Budapest-Capital Regional Court), appealed from Case 2.Pk.500.132/2016/11 (Pest Central District Court).

[28] Appealed from Case 50.Pkf.630.055/2018/2 (Budapest-Capital Regional Court), appealed from Case 28.Pk.500.270/2017/27 (Pest Central District Court).

[29] Ibid. para. 56. Appealed from Case 50.Pkf.631.543/2018/4 (Budapest-Capital Regional Court), appealed from Case 26.Pk.500.277/2017/12 (Pest Central District Court).

[30] Reported as BH 2011.6.167.

[31] Reported as BH 2014.8.248.

cate two weeks thereafter. The Supreme Court held that it was at the Belgian court's discretion to decide whether to accept the certificate and establish a new date or reject this, if it considered this appropriate to obviate the protraction of the procedure and to serve the best interests of the child. The Belgian court chose the second option.

In this case, the Supreme Court also interpreted the concept of public policy as a ground of refusal of recognition and enforcement. It established that it is obviously not contrary to Hungarian public policy if the foreign procedure is based on rules different from the Hungarian ones. Public policy is to be construed narrowly and used exceptionally. Recognition and enforcement can be rejected only if the foreign judgment would obviously go counter to Hungarian public policy, that is, if the decision entailed domestic legal consequences that would intolerably infringe the domestic sense of justice. It is not sufficient that the foreign procedure and decision is irreconcilable with domestic mandatory rules.

In Case *Pfv.II.21.594/2014*,[32] the defendant requested the Hungarian court to reject the recognition and enforcement of an Italian judgment because he could not present his case. However, the Supreme Court established that he had the possibility to take part in the procedure, hence, there was no reason to apply Article 23(c) of the Brussels IIa Regulation, which provides that recognition and enforcement of the judgment has to be rejected "where it was given in default of appearance if the person in default was not served with the document which instituted the proceedings or with an equivalent document in sufficient time and in such a way as to enable that person to arrange for his or her defense unless it is determined that such person has accepted the judgment unequivocally." The Court held that the requirement that the document instituting the procedure has to be served in sufficient time and in an appropriate way implies that the defendant has to have a real chance to appear in person and to hire a local attorney, that is, to defend himself. Accordingly, the primary purpose of the requirement of sufficient time is not to ensure that the defendant learns the date of the trial in time but to make sure that the defendant has sufficient time to defend himself until the decision ending the procedure is adopted. The requirement of appropriate way implies that during this time the defendant has the possibility to defend himself in the procedure, either personally or through an attorney, and eventually to request a new date for the trial and a personal hearing. The refusal of recognition and enforcement is an exceptional rule, which can be used only if the defendant is not afforded sufficient time between the service of the document instituting the procedure and the decision ending it to take the necessary measures (*e.g.* to hire an attorney or to submit a defense as to the merits). In this case, this time was seven months. The Supreme Court noted that the defendant did not take the Italian procedure seriously, it ignored the call concerning mandatory legal representation and hired no legal representative, thus excluding himself from the possibility to protect his legal interests.

2.1.4. Conclusions

Hungarian courts have been coping well with the application of the Brussels IIa Regulation both as to jurisdiction and recognition and enforcement.

A point that may merit emphasis is the treatment of cases with a significant non-EU element. In Case *Pfv.II.21.847/2014*,[33] the Supreme Court refused to apply the Brussels IIa Regulation to a matter partially connected to French Polynesia (where the parties allegedly lived at the time the procedure was launched). This approach appears to go counter to Article 6 of the Brussels IIa Reg-

[32] Reported as BH+ 2015.5.211.

[33] Reported as BH+ 2016.1.26.

ulation, which provides that a spouse who is habitually resident or a national of a Member State can be sued only in accordance with the Regulation's jurisdictional rules.

2.2. Jurisdiction, recognition and enforcement and applicable law in maintenance matters: application of the Maintenance Regulation

The reported cases on the application of the Maintenance Regulation are very rare. The survey produced 14 cases, however, most of these (11 cases) contained no substantive analysis.

2.2.1 Jurisdictional and related procedural issues

In Case *Pfv.II.21.658/2018/16*,[34] the Supreme Court established jurisdiction, under Article 5 of the Maintenance Regulation, on account of the defendant's appearance before the Hungarian court. The defendant appeared before the court and, thus, tacitly accepted its jurisdiction, when, in his response to the statement of claim, requested the court to reject the plaintiff's claim and made submissions to the merits without objecting to the court's jurisdiction.

2.2.2. Applicable law

In Case *Pfv.22223/2017/4*,[35] the Supreme Court established that the 2007 Hague Protocol, which determines the law applicable to maintenance due to the Maintenance Regulation, encapsulates a "moving connecting factor." Article 3 of the 2007 Hague Protocol subjects maintenance obligations to the law of the habitual residence of the creditor, which may change over time, leading to the application of another law "from the moment when the change occurs." In this case, the plaintiff, after the spouses got separated, became habitually resident in Hungary, hence, Hungarian law applied to the claim for maintenance.

2.2.3. Recognition and enforcement

Hungarian law's provision that limits the payment of maintenance to arrears of six months raised questions of interpretation in the context of recognition and enforcement under the Maintenance Regulation. According to Hungarian law, the maintenance creditor may claim maintenance retrospectively for the period exceeding six months only if the claim's late submission is justifiable; claims for maintenance for the period preceding three years are not legally enforceable.[36]

In Case *Pfv.I.21.308/2017/3*,[37] the maintenance judgment was issued by a French court and underFrench law the limitation period was five years.[38] However, in Hungary, the first and second instance courts held that enforcement was governed by local law and, as enforcement was sought in Hungary, the above six-month limitation period applied. The Supreme Court confirmed that, in case of enforcement in Hungary, the limitation period is determined by Hungarian law. However,

[34] Reported as BH 2020.4.108.

[35] Appealed from Case Pf.630704/2017/12 (Budapest-Capital Regional Court), appealed from Case P.22943/2013/73 (Budapest District Court for the Districts of IV and XV).

[36] Section 4:208 of the Hungarian Civil Code.

[37] Reported as BH 2018.4.120.

[38] Article 2224 of the Code Civil.

the Court remanded the case because the lower-level courts established the time of the request of enforcement erroneously. While the first and second instance courts considered the request for enforcement submitted to the Hungarian court as relevant, the Supreme Court held that the creditor may claim maintenance as from the time he submitted his request to the French central authority and for the preceding six-months period.

Unfortunately, the Supreme Court's decision seems to be at odds with Article 21 of the Maintenance Regulation. Although Article 21(1) provides that while refusal and suspension of enforcement are governed by the law of the Member State where enforcement is sought, Article 21(2) makes clear that enforcement cannot be refused if the claim is not time-barred either under the law of the country of origin or the country of enforcement. Enforcement may be refused "if the right to enforce the decision of the court of origin is extinguished by the effect of prescription or the limitation of action, either under the law of the Member State of origin or under the law of the Member State of enforcement, whichever provides for the longer limitation period." In the above case, the limitation period set by French law (country of origin) was five years, while under Hungarian law it was six months (with an objective term of three years). Given that French law provided for a longer limitation period, it should have been applied.

3. Judicial practice in succession matters having a cross-border element

The survey produced 2 court cases where reference was made to the Succession Regulation.[39] In one of them the Regulation was not applicable *ratione temporis*.[40]

In Case *Pfv.I.20.164/2019*,[41] the Succession Regulation was found inapplicable *ratione materiae*. Here, the plaintiff and the deceased (whose legal successor was the defendant, as the deceased's heir) allegedly agreed that the plaintiff would provide care and support for the deceased and, in exchange for this service, the deceased would bequeath his entire property to the plaintiff. However, in his testament, the deceased bequeathed all his property to the defendant. The plaintiff sued the defendant for compensation for the services provided and referred to the alleged verbal agreement with the deceased. The Supreme Court established that this claim was contractual and not succession law. Hence, it did not come under the Succession Regulation but under the Brussels I Regulation. The Supreme Court carried out an autonomous interpretation of the term "succession" and, on the basis of the definition embedded in Article 3(1) of the Succession Regulation, stressed that it involves legal succession *mortis causa*. In this case, however, the plaintiff did not claim to be the deceased's legal successor but submitted a contractual claim as the deceased's creditor.

4. Conclusions

EU PIL instruments have been applied in numerous family and succession cases by Hungarian courts and raised no major conceptual issues. Because of the lack of conceptual difficulties, the overwhelming majority of the cases raised no substantive issues of interpretation. This demonstrates the contribution EU PIL rules are making to the effective settlement of cross-border cases and the creation of a European area of justice. The importance and role of EU PIL is also showcased by the exponentially growing number of cases where these instruments are applied by the courts.

Very interestingly, the number of succession matters has been saliently low, in reality, the research has found only a negligible number of court matters where the Succession Regulation was applied. This does not imply that there are no succession matters involving an international element or the

[39] Regulation 650/2012, OJ 2012 L 201/107.

[40] Case *Pfv.I.20.369/2017/7* (Supreme Court), reported as BH 2018.6.174.

[41] Reported as BH 2020.3.78.

international element is comparatively more often overlooked in these cases. It simply means that succession matters usually do not reach the court. The very low number of court cases in succession matters is highly counter-intuitive, given Central Europe, including Hungary, has emitted a huge number of migrant workers targeting Western Europe.[42] This migration is in stark contrast with the number of matters applying the Succession Regulation. It is also difficult to reconcile with the number of matters where other EU PIL instruments are applied: while this migration has generated a good deal of family law disputes, it has resulted only in a negligible number of succession matters.

It has to be noted that in Hungary succession matters are, in the first place, settled in a probate procedure carried out by a notary. This is not a court procedure and the notary normally does not adjudicate succession law disputes and his or her decisions are not published. This probate procedure filters the cases and apparently results in a situation where the parties have recourse to the court only in a few matters.

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ANNEX: Table of national case-law

Brussels IIa Regulation

Case Pfv.II.21.129/2011 (Supreme Court), reported as BH 2013.1.19

Case Pfv.II.21.677/2011 (Supreme Court), reported as BH 2012.6.154

Case Pfv.II.21.339/2011 (Supreme Court), reported as BH 2012.9.224 and EH 2011.2411

Case P.102782/2012/55 (Central District Court of Pest)

Case Pfv.20798/2009/7 (Supreme Court), appealed from Case Pf.21936/2008/4 (Zalaegerszeg Regional Court), appealed from Case P.20568/2007/16 (Zalaegerszeg Local Court)

Case P.20521/2014/31 (Székesfehérvár Regional Court)

Case Bf.836/2008/6 (Nyíregyháza Regional Court)

Case Pf.20218/2013/8 (High Court of Appeal of Debrecen), appealed from P.21966/2011/49 (Miskolc Regional Court)

Case Pfv.II.22.065/2012 (Supreme Court), reported as BH 2013.10.271

Case Pfv.II.21.582/2019/4 (Supreme Court)

Case P.101627/2017/112 (Central District Court of Pest)

Case Pfv.20791/2015/18 (Supreme Court), appealed from Case *Pf.635995/2014/7* (Budapest-Capital Regional Court), appealed from Case *P.102782/2012/55* (Central District Court of Pest)

Case Pfv.21618/2008/5 (Supreme Court), appealed from Case Pf.636262/2007/15 (Budapest-Ca-

[42] See *e.g.* Central Statistical Office (Poland), "Informacja o rozmiarach i kierunkach emigracji z Polski w latach 2004–2012" (October 2013) https://stat.gov.pl/cps/rde/xbcr/gus/L_Szacunek_emigracji_z_Polski_lata_2004-2012_XI_2012.pdf (30 November 2021). OECD, "Recent trends in emigration from Romania", in Talent Abroad: A Review of Romanian Emigrants", OECD Publishing, Paris, 2019.

pital Regional Court), appealed from Case P.101588/2006/44 (Pest Central District Court)

Case Pfv.20799/2012/5 (Supreme Court), appeal from Case Pf.22453/2011/5 (Budapest Regional Court), appealed from Case P.20794/2010/20 (Dunakeszi Local Court)

Case *Pf.1.20065/2020/10* (High Court of Appeal of Budapest), appealed from Case 35.P.24.108/2014/178 (Budapest-Capital Regional Court)

Case Pkf.635281/2009/4 (Budapest-Capital Regional Court), appealed from Case Pk.500014/2009/9 (Pest Central District Court)

Case Pfv.21582/2019/4 (Supreme Court), appealed from Case Pf.21234/2018/20 (Szolnok Regional Court), appealed from Case P.20663/2017/5 (Jászberény Local Court)

Case Pfv.20463/2019/8 (Supreme Court), appealed from Case Pf.632769/2018/28 (Budapest-Capital Regional Court), appealed from Case P.30770/2015/147 (Buda Central District Court)

Case Pfv. II. 21.588/2008/5 (Supreme Court), appealed from Case 2.Pkf.21.036/2008/2 (Nyíregyháza Regional Court), appealed from Case 29.P.20.528/2008 (Nyíregyháza Local Court)

Case Pfv.II.20.491/2009/5 (Supreme Court), appealed from Case 2.Pf.20.552/2008/13 (Veszprém Regional Court), appealed from Case 4.P.21.495/2006 (Veszprém Local Court)

Case Kpkf. 2. 50.021/2010/2 (High Court of Appeal of Budapest), appealed from Case 13.Kpk.50.500/2009/5 (Eger Regional Court)

Case Pfv. II. 22.004/2010/6 (Supreme Court), appealed from Case 50.Pkfv.637.528/2010/3 (Budapest-Capital Regional Court), appealed from Case 12.Pk.500.112/2010 (Pest Central District Court)

Case Pfv. II. 20.699/2011/4 (Supreme Court), appealed from Case 50.Pkfv.640.487/2010/4 (Budapest-Capital Regional Court), appealed from Case 12.Pk.500.163/2010 (Pest Central District Court)

Case Pfv.II.21.051/2014/7 (Supreme Court), appealed from Case 50.Pkf.634.732/2014/4 (Budapest-Capital Regional Court), appealed from Case 9.Pk.500.024/2004/14 (Pest Central District Court)

Case Pfv.II.20.150/2015/4 (Supreme Court), appealed from Case 50.Pkf.640.185/2014/3 (Budapest-Capital Regional Court), appealed from Case 30.Pk.500.163/2014 (Pest Central District Court)

Case Pfv.II.20.823/2015/6 (Supreme Court), appealed from Case 50.Pkf.632.726/2015/3 (Budapest-Capital Regional Court), appealed from Case 2.Pk.500.269/2014 (Pest Central District Court)

Case Pfv.II.21.442/2015/4 (Supreme Court), appealed from Case 50.Pkf.633.040/2015/4 (Budapest-Capital Regional Court), appealed from Case 15.Pk.500.288/2014 (Pest Central District Court)

Case Pfv.II.20.001/2016/6 (Supreme Court), appealed from Case 50.Pkf.638.547/2015/4 (Budapest-Capital Regional Court), appealed from Case 15.Pk.500.238/2015 (Pest Central District Court)

Case Pfv. II. 21.366/2016/11 (Supreme Court), appealed from Case Pkf.I.25.119/2016/2 (High Court of Appeal of Győr), appealed from Case Pkf.20.965/2015/4 (Szombathely Regional Court)

Case Pfv. II. 21.826/2016/6 (Supreme Court), appealed from Case 50.Pkf.631.460/2016/9 (Budapest-Capital Regional Court), appealed from Case 2.Pk.500.188/2015/23 (Pest Central District

Court)

Case Pfv.II.22.338/2016/5 (Supreme Court), appealed from Case 50.Pkf.635.871/2016/5 (Budapest-Capital Regional Court), appealed from Case 26.Pk.500.173/2016/5 (Pest Central District Court)

Case Pfv. II. 21.910/2017/4 (Supreme Court), appealed from Case 50.Pkf.632.602/2017/2 (Budapest-Capital Regional Court), appealed from Case 20.Pk.500.043/2017/6 (Pest Central District Court)

Case Pfv.II.21.261/2019/15 (Supreme Court), appealed from Case 4.Pkf.20.258/2019/7 (Szeged Regional Court), appealed from Case 2.P.20.183/2018/22 (Hódmezővásárhely Local Court)

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