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The Law Governing Lawyers: National Rules, Standards, Statutes, and State Lawyer Codes: Authors: Susan R. Martyn, Lawrence J. Fox, W. Bradley Wendel: Publisher: Wolters Kluwer Law & Business, 2009:...

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In considering the law that governed the arbitration agreement, it placed great weight on the parties' choice of an English seat, holding that there was a strong presumption in the absence of an express choice of law governing the arbitration agreement that the curial law (the law of the seat) had impliedly been chosen by the contracting parties.

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