

GENERAL REMARKS

The Committee of Redaction call the attention upon the following points:

1. - Very few foreign legislations have up to now made provisions of law concerning hire-purchase. In France and England, decisions come from jurisprudence only (except a French law concerning sale by instalments of debentures in the Stock-Exchange March 1900). In Germany there has been a Law 16th. May 1894 which concern really sales with payment by instalments and, though intended to protect buyers who have to pay during many months for a property delivered to them at once, is quite different from the idea of hire-purchase as admitted in English, French and Siamese laws.⁽¹⁾

2. - It is noticeable that finally the English and French laws have come to the same policy in matter of hire-purchase: they take

(1) The German Law takes the contract as one of sale with payment by instalments where the contract can be determined. Determination of sale by the parties would be contrary to our Civil Code.