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From Foreign Law to Lex Fori: The Challenge of Recognition of International Judgments

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Abstract

This paper examines the recognition of foreign court judgments within the framework of private international law and civil procedure in Albania. It analyzes the legal rules governing judicial proceedings involving foreign elements, with particular attention to the principles of territoriality, *lex fori*, and reciprocity, which guide Albanian courts in the application of foreign law. In accordance with international civil procedure, proceedings are regulated by the law of the forum state, while Albanian courts are required to respect the content of foreign law unless it conflicts with the Albanian legal order.

The recognition of foreign judgments is essential to ensure their legal effectiveness and to prevent procedural and substantive legal complications. In Albania, this process is regulated by Chapter IX of the Civil Procedure Code, which establishes specific conditions for recognition. A foreign judgment must be final, must not conflict with prior Albanian judicial decisions, and must comply with fundamental principles of due process, including proper notification of the parties and respect for public order. Recognition does not convert foreign law into Albanian law; rather, it renders the foreign judgment enforceable and grants it legal effect within the Albanian legal system. This process ensures the authority of *res judicata* and guarantees equal rights for the parties involved.

Additionally, the paper examines the different forms of recognition, the role of the Court of Appeals, the importance of reciprocity, and the use of evidentiary mechanisms in recognition proceedings. This analysis provides a comprehensive overview of the applicable legal procedures and judicial practices related to the recognition of foreign judgments, contributing to the consistent and fair application of private international law in Albania.

Keywords: judicial decisions, *lex fori*, reciprocity, recognition, civil procedure.

1. Introduction

1.1. *Governing Law of Judicial Procedure in the International Context*

Civil procedural law constitutes a field of paramount importance within private international law. International civil procedural law—also referred to as the law governing conflicts of procedural rules—represents, from a procedural perspective, a set of guiding principles applicable to courts adjudicating disputes containing a foreign element. As a general rule, civil proceedings are governed by the procedural norms of the state in which the court is located, namely, the state within whose territory the proceedings take place. This reflects the principle of territoriality, which is upheld in nearly all legal systems and is based on the understanding that procedural activity is intrinsically linked to state sovereignty. Consequently, states do not permit their courts to exercise jurisdiction by applying foreign procedural rules.

The principle of territoriality in international civil proceedings has long been expressly recognized in the legislation of developed legal systems. These systems are founded on the general rule that jurisdiction and procedural form are governed by the law of the country in which the proceedings occur. This formulation implies that all aspects of procedural legal relations are subject to *lex fori*. Accordingly, when a civil proceeding is conducted in Albania, Albanian law exclusively governs the procedural conduct of the case. This approach is explicitly established in Title II of Law No. 3920, dated November 21, 1964, *On the Enjoyment of Civil Rights by Foreigners in Albania and the Application of Foreign Law*.

The validity of foreign procedural acts must, in principle, be assessed in accordance with the law of the state in which such acts were performed, unless Albanian law provides otherwise. This framework is clearly articulated in Article 220 of the Civil Procedure Code of the Republic of Albania. This provision regulates the circumstances under which foreign law may be applied by an Albanian judge in resolving a dispute. Specifically, the court is obliged to make every effort to apply foreign law in accordance with its substance. However, when the direct application of foreign law proves impossible—particularly where it conflicts with the Albanian legal order—the application of *lex fori* serves as a corrective mechanism.

It follows that, in disputes involving foreign elements, only claims recognized by the Albanian legal order may be brought before Albanian courts, regardless of whether the plaintiff is an Albanian or foreign national. As a general rule, all claims recognized under Albanian legislation may be pursued by both categories of parties. Neither Albanian nor foreign litigants may request Albanian courts to issue judgments that are not acknowledged by the Albanian legal system. In this context, a foreign individual or legal entity may be sued before an Albanian court only under the conditions set forth in Article 30 of Law No. 3920, dated November 21, 1964:

- when the individual has residence in Albania or has expressly accepted the jurisdiction of Albanian courts, except in cases involving immovable property located outside Albanian territory; or
- when the claim concerns movable or immovable property located in Albania,

or obligations that have arisen or are to be performed within Albanian territory, including claims connected to other proceedings pending before Albanian courts. This legal framework may be illustrated by the following example. An Albanian national may, on the basis of reciprocity, be subject to proceedings in the courts of a foreign state. Conversely, a foreign national may be subject to proceedings before Albanian courts under similar conditions. For instance, a French national served as a representative of a humanitarian mission in Albania from May to September 1997, residing in the city of Durrës. During this period, the French national engaged in an intimate relationship with an Albanian woman, despite being married to a French citizen. Several months after the individual's return to France, the Albanian woman gave birth to a child, whose biological father was the French national. In July 1998, the woman initiated legal proceedings before the District Court of Durrës, seeking recognition of the child born out of wedlock and the imposition of parental obligations, including child support.

In such a case, once the court establishes that the legal relationship contains a foreign element, it must first determine whether it has jurisdiction. Given that the defendant is a French national without residence in Albania, the court must assess whether the jurisdictional conditions set out in Law No. 3920 are met. If these conditions are not satisfied, the court is required, pursuant to the final paragraph of Article 30, to ascertain whether reciprocity exists between Albania and France for disputes of this nature. In the absence of reciprocity, the court must declare a lack of jurisdiction. Conversely, if reciprocity is established, the court may proceed to adjudicate the case in accordance with the fundamental principles of Albanian private international law. Another sensitive issue in international civil proceedings concerns the law governing procedural claims and the evidentiary means submitted in support of such claims. As a general rule, procedural claims are governed by *lex fori*. However, in exceptional cases, the application of foreign law may be required, particularly with respect to the conditions for initiating proceedings, including a party's capacity: (a) to be a party to the proceedings; (b) to act personally and perform procedural acts; and (c) to act through legal representation.

A party's capacity to participate in proceedings is generally determined by the law of the individual's nationality (*lex nationalis*), reflecting its close relationship to legal capacity and capacity to act. With respect to foreign nationals, the principle of reciprocity remains essential, ensuring that foreign parties enjoy the same procedural rights and obligations in Albania as Albanian nationals would enjoy in the foreign party's home state. This principle is explicitly recognized in Article 30 (c) of Law No. 3920.

Procedural capacity, defined as the ability to personally perform procedural acts, as well as issues concerning representation and legal assistance, is generally governed by *lex fori*. Nevertheless, Article 27 of Law No. 3920 provides that the procedural capacity of a foreign national is primarily determined by the law of the individual's nationality. For the purposes of Albanian proceedings, however, it is sufficient that the foreign national possesses procedural capacity under Albanian law, reflecting the

so-called “citizen ignorance hypothesis.”

Article 2 of Law No. 3920 further recognizes the right of foreign legal entities to access Albanian courts and to enjoy procedural civil rights for the protection of their interests. Where rights arise outside Albanian territory, their recognition or enforcement against persons residing in Albania is permitted only on the basis of reciprocity. This principle serves as a fundamental limitation on the application of foreign law in the absence of reciprocal treatment by the foreign state concerned.

Finally, the law governing evidentiary materials submitted by the parties must be considered. In accordance with the principle of territoriality, procedural actions including evidentiary measures are generally governed by *lex fori*. Nonetheless, international doctrine and jurisprudence reveal differing views on this matter. Some scholars argue that evidence forms part of procedural relations and should therefore be regulated exclusively by *lex fori*. Others maintain that evidentiary tools are closely connected to the substantive legal acts they support and should thus be governed by the law applicable to those acts, such as *lex contractus* or *lex successionis*.

Evidence remains a procedural instrument through which the court establishes facts in order to apply legal norms. It is functionally connected to the legal norm but does not form part of it. Within Albanian private international law, *lex fori* should therefore be regarded as the primary connecting factor governing evidentiary rules, while nationality may serve as a secondary connecting factor, provided that the principle of reciprocity is respected.

It must be emphasized that these rules apply strictly to evidentiary tools. The formal requirements of civil legal acts, which typically precede judicial proceedings, concern the validity of the legal act itself rather than procedural evidence. For example, documents determining the formal validity of a legal act fall under the governing substantive law and cannot be treated as procedural evidence.

1.2 Procedure for the Recognition of Foreign Court Decisions

The principles of judicial economy and international cooperation have led most states to recognize the possibility for their courts to take into account foreign judgments and legal acts. Today, only a limited number of legal systems completely deny legal effect to foreign judgments and require the initiation of a new judicial process, as though the foreign decision had never been rendered. Such an approach was characteristic of English law prior to 1933 and of the traditional United States system, under which foreign judicial decisions served merely as a factual basis for issuing a new domestic judgment.

In contrast, German law adopts a more straightforward approach, whereby a foreign judgment is automatically recognized provided that it satisfies certain formal requirements. By comparison, the French–Belgian system and English law after 1933 require a preliminary procedure through which the foreign judgment is reviewed to ensure compliance with the substantive requirements of the domestic legal order before it may be enforced. A similar approach is followed in Albania. Before a foreign judgment may produce legal effects within the Albanian legal system, it must

undergo a formal recognition procedure. This procedure entails an examination of the judgment's content to determine whether it conflicts with mandatory provisions of Albanian law. If no such conflict exists, the foreign judgment becomes directly enforceable in Albania.

The recognition of foreign court decisions in Albania is governed by civil procedural law, specifically Chapter IX of the Civil Procedure Code. Article 393 expressly provides that foreign civil judgments may be recognized and enforced in the Republic of Albania. The same provision affirms the primacy of bilateral or multilateral international agreements concerning the recognition and enforcement of judicial decisions over domestic legislation. This principle of supremacy is further entrenched in Article 122(2) of the Constitution of the Republic of Albania. In conducting the recognition procedure, Albanian courts are required to strictly observe the criteria set forth in Article 394 of the Civil Procedure Code.

Article 394 enumerates the circumstances that constitute obstacles to the recognition or enforcement of a foreign court judgment. Pursuant to this provision, a foreign judgment shall not be recognized or enforced in the Republic of Albania if:

- (a) under Albanian law, the dispute falls outside the jurisdiction of the foreign court that rendered the decision;
- (b) the claim and summons were not properly or timely served on the defendant in absentia, thereby depriving the defendant of the right to defense;
- (c) a final judgment has already been issued by an Albanian court between the same parties concerning the same subject matter and legal cause, in accordance with the principle of *res judicata*;
- (d) proceedings concerning the same dispute were initiated before an Albanian court prior to the foreign judgment becoming final and enforceable; or
- (e) the foreign judgment was rendered in violation of the mandatory provisions of its own legal system or conflicts with the fundamental principles of the Albanian legal order.

Among these obstacles, the most significant are those relating to *res judicata* and public policy. The principle of *res judicata* applies specifically to civil court judgments that, under Albanian civil procedural law, possess binding legal authority. The public policy exception, on the other hand, represents one of the most important limitations on the recognition of foreign judgments. Within the framework of Albanian private international law, this principle is closely connected to Article 26 of Law No. 3920, dated November 21, 1964, *On the Enjoyment of Civil Rights by Foreigners in Albania and the Application of Foreign Law*.

With regard to the procedure for submitting and reviewing applications for the recognition and enforcement of foreign judgments, Albanian civil procedural law confers exclusive jurisdiction on the Court of Appeals. This legislative choice reflects fundamental principles of civil procedure, as the Court of Appeals possesses the institutional competence to review judicial decisions rendered by lower courts. Only a decision of the Court of Appeals may authorize the enforcement of a foreign court judgment within the territory of the Republic of Albania.

The legislature's decision to vest this authority in the Court of Appeals is grounded in both procedural and ethical considerations. As a judicial body capable of exercising a higher level of legal scrutiny, the Court of Appeals is best positioned to assess the compatibility of foreign judgments with the Albanian legal order. From this perspective, assigning such competence to first-instance courts would be procedurally inappropriate and inconsistent with the principles governing judicial review (Kuci, 2008).

1.3 The Legal Nature of Recognition Decisions

The procedure for recognizing a foreign judicial decision becomes most apparent through its enforcement within the domestic legal system. Although the law clearly provides for this legal effect, ambiguity remains concerning the precise legal relationship between the foreign judicial decision and the domestic judicial act that initiates the recognition process (Kuci, 2008). This issue has been widely debated in legal scholarship; however, a useful point of departure is the principle of mutual recognition of legal effects by distinct national legal systems.

In practice, foreign civil court judgments in Albania acquire legal effect through a formal recognition procedure. This procedure primarily functions as a mechanism for verifying whether the conditions required under domestic law for granting legal effect to a foreign judgment are satisfied. The recognition decision issued by an Albanian court serves as a technical and procedural instrument that enables the enforcement of the foreign judgment within the national legal framework.

Importantly, the recognition decision does not modify the substance of the foreign judgment, nor does it transform the foreign judgment into a domestic Albanian ruling or convert foreign law into Albanian law. Instead, it merely determines whether the foreign decision satisfies the statutory criteria for recognition and whether it may produce legal effects within the Albanian legal system. Once enforcement is authorized, the foreign judgment is accorded the authority of *res judicata* within Albania, as recognized through the domestic recognition decision (Jezdi, 1976).

Following recognition, the foreign judgment becomes directly enforceable, and its subject matter remains protected by the principle of *res judicata* under the Albanian legal order. At the same time, the recognition of a foreign judicial decision constitutes an autonomous Albanian judicial act, which must comply with the procedural requirements established by domestic law. Consequently, all procedural actions related to the recognition of foreign judgments are governed exclusively by the provisions of the Albanian Civil Procedure Code.

The action for the recognition of a foreign judgment is subject to a specific statute of limitations, determined in accordance with the domestic rules governing limitation periods for such claims. This limitation period begins on the date on which the foreign judgment becomes final in the state of origin and is interrupted upon the filing of the recognition request before the competent Albanian court.

1.4 Conditions for the Recognition of Foreign Court Decisions

For a foreign civil judgment to be recognized by Albanian courts, certain substantive and procedural conditions must be satisfied to ensure that it may produce legal effects within the domestic legal order. The primary requirement is that the act for which recognition is sought constitutes a foreign judicial decision that has acquired finality. In other words, the decision must qualify as a judicial act both under the legal system in which it was rendered and under Albanian law. This qualification does not require complete identity between foreign judicial acts and those recognized under Albanian law. Rather, the concept of a foreign judicial decision eligible for recognition must be interpreted in light of contemporary judicial practice.

In essence, any decision issued by a body vested with jurisdictional authority, which imperatively expresses the will of the law and affects subjective legal situations in a manner sufficient to acquire the authority of *res judicata*, may qualify as a foreign judicial decision for the purposes of recognition (Jezdi, 1976). A related and more complex issue concerns the recognition of ecclesiastical or religious decisions rendered by religious institutions in foreign states. Legal scholarship is divided on this matter: some authors categorically reject the recognition of such decisions, while others accept it under certain conditions. A closer examination reveals that religious decisions operate within a distinct judicial sphere, namely a system of religious courts that a state's legal order may authorize to resolve matters of a religious nature. In such areas, intervention by state courts may be limited or excluded.

Comparative analysis demonstrates that some modern legal systems have accepted the recognition of religious decisions, provided that their religious character is respected and that the proceedings are acknowledged by the legislation of the states concerned. A notable example is the Concordat concluded on February 18, 1984, between the Italian Republic and the Vatican, which allows for the recognition of certain ecclesiastical decisions within the Italian legal system. In such cases, the procedure followed by Italian courts closely resembles that applied to the recognition of foreign civil judgments.

Not all judicial acts that might be characterized as foreign judgments are subject to recognition proceedings. Judicial acts that produce no legal effects outside the jurisdiction in which they were rendered are generally excluded from recognition. Interim or preparatory decisions, such as procedural orders related to the conduct of hearings, typically have effect only within the issuing legal system. By contrast, judicial decisions with broader legal consequences—such as judgments declaring the bankruptcy of a legal entity—are generally capable of recognition in other legal systems.

Furthermore, the judge responsible for recognizing a foreign judicial decision must be competent to assess whether the foreign court had jurisdiction over the underlying dispute, in accordance with the jurisdictional principles of the Albanian legal system. In contemporary private international law doctrine, this competence is referred to as the “international jurisdiction of the judge,” which entails an assessment of the authority of foreign courts to adjudicate matters with cross-border elements. The

Albanian legislator's approach reflects the principle that the rules governing the international jurisdiction of Albanian courts should also serve as a reference point for evaluating the competence of foreign judges. This reasoning is grounded in a form of logical reciprocity, according to which what is considered acceptable for one legal system should likewise be acceptable for another (Bilali & Kuqi, 2008).

The principle of reciprocity, which aims to protect a state's citizens from potential injustices arising from foreign jurisdiction, is not applied uniformly with respect to the international competence of foreign judges. Nevertheless, for a foreign judgment to be enforceable in Albania, it must be effective in the legal system in which it was rendered. This requirement ensures that the judgment has acquired finality in the state of origin, taking into account factors such as the expiration of appeal deadlines and the absence of opposition. Importantly, the applicable law governing the recognition procedure is *lex fori*, namely the law of the Albanian court before which recognition is sought, rather than the procedural law governing the foreign proceedings.

Finally, a foreign judgment cannot be recognized if it conflicts with an existing Albanian court decision concerning the same subject matter and of the same legal nature. This requirement serves to prevent contradictory judgments and to preserve the internal coherence of the Albanian legal system, ensuring consistent judicial treatment of analogous cases.

1.5 Types of Recognition of Foreign Judicial Decisions

The recognition procedure discussed thus far, initiated upon the request of an interested party, constitutes the general procedure for the recognition of foreign judicial decisions. This procedure primarily concerns the declaration of the enforceability of a foreign judgment and culminates in a recognition decision issued by a single judicial authority. Upon such a request, the court may conduct a substantive examination of the foreign decision, but only where the party seeking recognition participated in the proceedings before the foreign court that rendered the judgment. Moreover, recognition may be denied where the foreign decision contains serious defects—such as factual errors, falsified evidence, or other procedural irregularities—that would justify its review or revision. This approach ensures procedural fairness while safeguarding the integrity of foreign judicial determinations, by providing a mechanism to address substantive or procedural deficiencies in the original decision (Lama, 1974).

In addition to the general recognition procedure, enforceability may also be acknowledged incidentally within the context of pending domestic proceedings. In such cases, recognition arises as part of an ongoing judicial process, with the purpose of resolving a specific legal issue relevant to the case at hand. Typical examples include the determination of the validity of a prior marriage affecting the legality of a subsequent marriage, or the recognition of an adoption that has implications for inheritance or property rights. This form of incidental recognition may be carried out by a judge other than the one ordinarily competent to decide recognition matters—typically the appellate judge. The judge must nevertheless assess whether the foreign

decision complies with the requirements of Albanian law. The distinguishing feature of incidental recognition lies in its limited effects, as the recognized judgment produces legal consequences solely within the context of the specific proceedings and acquires *res judicata* authority only for that case.

At this juncture, attention must also be directed to foreign arbitral awards and their recognition and enforcement within the Albanian legal system. These decisions play a central role in international commercial practice and are frequently invoked in judicial proceedings. A key issue concerns the determination of which arbitral awards qualify as “foreign.” This concept does not merely refer to awards rendered outside Albanian territory, but rather to decisions that are fundamentally foreign in relation to the legal system governing their issuance, procedure, and effects.

Another essential condition for recognition is that the foreign judicial decision must possess enforceability under the law of the state in which it was rendered, equivalent to that of a domestic judgment. Albanian legislation explicitly codifies this requirement, reflecting a common approach among various legal systems. Furthermore, the decision must fall within the scope of the international jurisdiction of the authority that rendered it, which, in certain circumstances, may include an arbitrator acting within a duly constituted arbitral tribunal (Kalia, 2010).

Among the international instruments facilitating the recognition of foreign judicial and arbitral decisions, the New York Convention of June 10, 1958, on the Recognition and Enforcement of Foreign Arbitral Awards, represents one of the most significant and least restrictive frameworks. Within the broader domain of recognition, particular attention must also be given to voluntary judicial acts. Many legal systems explicitly provide for the recognition of such acts through specific statutory provisions.

Voluntary judicial acts are decisions issued by a judicial authority that possess an administrative character and do not arise from contentious proceedings between opposing parties. An example is a decision by a foreign court appointing a guardian for a legally incapacitated person. Although such acts are non-contentious, they often affect third parties and therefore require recognition when invoked in another legal system. Consequently, when a foreign judicial decision is recognized, voluntary judicial acts associated with it are generally recognized as well. In many jurisdictions, including Albania, competence for recognizing such acts is vested in the same judicial authority responsible for recognizing foreign judgments, typically the court of appeal (Kalia, 2010).

Contemporary private international law doctrine further acknowledges that a foreign judicial decision may produce certain legal effects even in the absence of formal recognition. The earlier theory of the absolute insignificance of unrecognized foreign judicial decisions is now considered obsolete. Modern legal thought reflects a principle of reciprocal recognition among national legal systems, grounded in the realities of cross-border legal relations. This perspective is reinforced by the observation that civil procedural laws generally regulate only the formal recognition of foreign judgments, without explicitly addressing the potential effects of decisions that remain unrecognized.

Recent scholarship has emphasized the normative dimension of judicial decisions, recognizing that a foreign judgment—beyond acquiring enforceability through recognition—may also function as an object of application within private international law, particularly with respect to its substantive content. Of special relevance are analyses highlighting the functional analogy between rules governing the recognition of foreign judgments and those requiring the application of foreign law. Although unrecognized foreign decisions do not automatically produce legal effects within the domestic legal order, they may nonetheless acquire legal significance through the application of conflict-of-law rules.

These doctrinal developments reflect an effort to reconcile legal theory with empirical realities and to overcome the limitations of earlier formalistic approaches. Modern scholarship increasingly treats the recognition of foreign judicial decisions and the application of foreign law as distinct yet complementary mechanisms, united by a common objective: the regulation of domestic legal relationships containing foreign elements (Kalia, 2010).

The application of private international law to the substantive elements embodied in an unrecognized foreign judicial decision allows the domestic judge to take into account circumstances previously determined by a foreign authority. However, this approach raises unresolved difficulties, particularly where conflict-of-law rules mandate the application of foreign law only insofar as it forms the substantive basis of a judicial decision that itself is subject to recognition.

Despite the advantages and limitations inherent in both recognition and conflict-of-law approaches, practical challenges persist. Chief among these is determining whether priority should be accorded to the formal recognition of the foreign judgment or to the application of private international law as a supplementary mechanism. Within the Albanian legal system, the recognition of foreign judicial decisions assumes particular importance when linked to the application of private international law norms incorporated in such decisions. Ultimately, the recognition of foreign judicial decisions remains a sensitive and complex issue, requiring careful judicial balancing of procedural safeguards, substantive justice, and international legal cooperation.

2. Conclusions and Recommendations

2.1 Conclusion

Civil procedures involving foreign elements are of particular importance for the application of private international law in Albania. The governing legal framework clearly establishes that procedural actions are conducted in accordance with *lex fori*, thereby ensuring respect for state sovereignty and the principle of territoriality in procedural law. This principle guarantees that Albanian courts apply domestic procedural law, except in cases where Albanian legislation expressly provides for the application of foreign law.

Foreign natural persons and legal entities enjoy procedural rights in Albania, including the right to initiate or be subject to legal proceedings. The exercise of

these rights is conditioned upon compliance with the principle of reciprocity, which requires that procedural rights granted to foreign parties in Albania correspond to equivalent rights afforded to Albanian nationals in the foreign party's state of origin. This ensures procedural equality and mutual legal respect between states.

The recognition of foreign judicial decisions in Albania is regulated by Title IX of the Civil Procedure Code. For recognition to be granted, the foreign judgment must be final, must not conflict with existing Albanian court decisions, and must not violate Albanian public order. Exclusive jurisdiction over recognition proceedings is vested in the Court of Appeals, which is competent to examine both the formal and substantive validity of foreign judgments within the limits established by law.

A recognition decision does not convert a foreign judgment into an Albanian judicial act. Instead, it grants the foreign judgment enforceability within the domestic legal system, thereby conferring upon it the effects of *res judicata* and enabling its execution. The recognition decision is procedural in nature and serves as a technical legal instrument facilitating the enforcement of the foreign judgment.

Recognition is subject to several conditions, including the finality of the foreign judgment, its compatibility with Albanian mandatory legal norms, and the absence of procedural or substantive obstacles to recognition. The procedure may take the form of general recognition or may involve a more detailed examination in specific cases, such as those involving errors, falsified evidence, or other serious procedural irregularities.

The Albanian system for the recognition of foreign judgments reflects a balanced approach that reconciles respect for state sovereignty, the protection of public order, and the promotion of international judicial cooperation. Through clearly defined procedures and safeguards, the system ensures legal certainty, coherence of judicial decisions, and the effective enforceability of foreign judgments within the territory of the Republic of Albania.

2.2 Recommendations

Albania should promote the reinforcement of international reciprocity agreements with other states to facilitate the recognition and enforcement of judicial decisions. In cases where such agreements do not exist, the negotiation of bilateral treaties governing the recognition of civil and family law judgments is recommended. Clear and uniform guidelines should be developed for appellate courts to ensure consistency and predictability in the recognition of foreign judgments. In addition, the establishment of electronic platforms is recommended to facilitate the verification of foreign judgments and the authentication of supporting documentation. Periodic training programs should be organized for judges and judicial staff in the field of private international law, with particular emphasis on the recognition and enforcement of foreign judgments. Such training should address complex issues, including the treatment of foreign evidence, international contract law, and cross-border inheritance matters. Guidelines should be adopted for the admission and evaluation of evidence submitted by foreign individuals and institutions, while maintaining

lex fori as the primary regulatory framework. At the same time, procedural practices should be harmonized with international standards to ensure fairness and effective enforcement. Information centers should be established to assist foreign citizens and legal entities in navigating recognition procedures in Albania. Furthermore, clear and accessible guidelines should be published, detailing applicable deadlines, legal conditions, and required documentation for recognition proceedings. Albanian legislation should be periodically updated to reflect developments in international jurisprudence and European Union standards concerning the recognition of judgments. In this regard, consideration should be given to amending Law No. 3920 and the Civil Procedure Code to enhance the resolution of disputes involving foreign elements. A comprehensive statistical system should be established to monitor recognition requests, adjudication timelines, and the enforcement success of foreign judgments. The systematic analysis of this data would support procedural reforms and assist in identifying persistent practical obstacles.

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