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MANZER CANADA-U.S. COMMERCIAL LAW GUIDE Second Edition by Dr. Alison R. Manzer Release No. 2, September 2026

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This publication is a practical guide to commercial business and legal issues that can arise for businesses operating in both Canada and the United States. An examination of each of Canada and the United States, on a comparative basis, indicating areas that should be considered by a business commencing, or continuing, business in both countries. The book highlights commercial law in areas where similarities or differences in the legal systems can affect business operations, legal decisions, legal documentation and practices and processes.

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This release features the addition of new commentary in Chapter 6. Personal Property Secured Lending (Cross Border)—Appendices.

Highlights:

- **Chapter 6. Personal Property Secured Lending (Cross Border)—Appendices**—The globalization of capital markets has fundamentally transformed the landscape of commercial lending. Corporations increasingly operate across multiple jurisdictions, maintaining assets, subsidiaries, and customer bases that span national boundaries. This commercial reality creates complexity for secured creditors who must navigate different legal frameworks to protect their interests in collateral across borders. For instance, when a Canadian lender extends credit to a borrower with inventory in Mexico, receivables owing from German customers, and intellectual property registered in the United States, the question of which law governs the creation, perfection, and priority of security interests becomes not merely academic but commercially essential. (“*Cross-Border Debt Financing and Security Interests: Navigating Multi-Jurisdictional Conflicts Between Canadian, United States, and Civil Law Regimes*” by Stephen Corrington).