Civil litigation: Comparative observations

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Singapore civil procedure gives a digital-asset claimant three things that Swiss procedure does not: interim relief against third parties on short notice, compelled disclosure from parties and non-parties, and proprietary remedies that survive the defendant's insolvency. Swiss procedure gives the defendant three things that Singapore does not. They are a cost regime in which the loser pays court fees and party compensation according to a tariff instead of actual expenditure, a limited disclosure regime that protects internal documents and the participation rights of the Privatkläger in a parallel criminal case. A claimant with a strong case and a traceable asset should litigate in Singapore where the asset is reachable there. A defendant with a defensible position and Swiss assets should resist Singapore jurisdiction early and litigate at home. Contract drafters between the hubs should decide this question in the dispute-resolution clause before the dispute decides it for them (see Part Q, Chapter III).

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