

SUBJECTIVE AND OBJECTIVE ADMINISTRATIVE CONTENTIOUS. COMPARATIVE LAW ASPECTS

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ABSTRACT: *Following the approach of a comparative law perspective, we are able to perceive, in the doctrinal, legislative and jurisprudential evolutions of the judicial systems considered in the present study, a common tendency to unify the jurisdictions, reaching at this moment a relative uniformity of the national jurisdictional guarantees in various law systems. The regulation of the judicial procedures that involve the public administration seems, in fact, to develop and generally to converge to forms of protection that are increasingly closer to those established in disputes between private persons before the courts of common law.*

KEYWORDS: *administrative contentious; judicial litigation body; administrative litigation body*

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