

?????????? ????????

?????????? ??? ?????? ????????????

MACIEJ SZPUNAR

??? 14?? ?????????? 2023 (1)

?????? C-746/22

Slovenské Energetické Strojárne A.S.

????

Nemzeti Adó- és Vámhivatal Fellebbviteli Igazgatósága

[?????? ??? F?városi Törvényszék (????????????? ????????????, ????????)

??? ??? ?????? ??????????? ??????] –

????????????? ?????????? – ?????????? – ????? ?????? ????? ?????????????? ????? –

?????? 2006/112/?? – ????? 170 – ?????????? ??? ??? ?? ?????????????? ??? ????? ??

????????????? ??? ?????? ?????? ?????? ?????????? – ?????? 2008/9/?? – ????? 20 – ?????? ???

????????? ?????? ?????????? ??? ??? ?????? ?????????? ?????????? – ?????? ???

????????? ??? ?? ?????????? ?????? ?????????? ?????????? – ?????? 23 – ??????

????????? ??? ?????????? ?? ?????? ?????????? ??? ?????? ?????? ??? ?????? ???

????????? ??? ?????????? –

?????????

1. ??? ??????? ??? ?????? ??????????? ?????? ??????????????? ?????? (??? ????: ???), ??
????????? ??????? ??? ?????? ??? ?????? ?????? ?????????????? ?????????? ????, ????
????????? ????, ?????????? ????, ?????? ????, ?????? ?????? ?????? ????, ????
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
????????? ????, ?????? ????, ?????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ?
«????????? ????, ?????? ??????». ?? ??? ?????? ???????, ??? ?????? ????, ??? ?????? ????
????????? ?????? ?????? ?????? ?????? ??????, ??? ??? ?????? ?? ?????????? ?? ?????? ????
????????? ?????? ?????? ?????? ?????? ?????? ?????? ????, ??? ?????? ?????? ????, ??? ?????? ????
????????? ????

2. ??? ??? ??????????? ???????, ?? ?????? ??? ?????? ???????????, ??? ??
????????? ????, ??????? ??????????? ??? ?????????????? ????. ? ?????????? ??? ???????
????????? ?????????? ??? ?????? ??? ??????????? ?????? ??? ??????????? ???????????, ???
??? ?? ?????? ??????????? ??? ??????, ??????????????? ??? ?????? ??? ??????????? ??? ???????
??? ?????????? ??? ?????? ??? ?????? ???????????.

3. ?? ?????????? ??? ??????????? ?????? ??????????? ??????????? ??? ?????? ??? ??????? (2).
??????, ??? ??????????? ? ?? ?????? ???????, ??? ?? ?????????? ??? ?????? ????
????????? ?????????? ??????????? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ?? ?????? ????
??? ?? ?????????? ??? ?? ?????? ????. ?? ?????????? ????, ???????, ??? ???????, ??? ??????? ??
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????? ??
????????? ??? ?????? ??? ??????.

?? ?????? ???????

?? ?????? ??? ???????

4. ?? ????? 170, ??????? ??, ??? 171, ?????????? 1, ??? ?????? 2006/112/?? ???
??????????, ??? 28?? ?????????? 2006, ??????? ?? ?? ?????? ?????? ?????? ???????????????
????? (3), ??? ?????????????? ?? ??? ?????? 2008/8/?? ??? ???????????, ??? 12??
?????????? 2008 (4) (??? ????: ?????? 2006/112), ?????????? ?? ???:

«????? 170

???? ??????????? ??? ???? ????, ??? ?????? ??? ?????? [...] ??? ?????? 3 ??? ??????
2008/9/?? [(5)] ??? ??? ?????? 171 ??? ?????? ????, ??? ?????? ?????????????? ???
????? ??? ?????? ??? ?????? ?????????????? ??? ?????? ??? ?????? ??? ?????????? ? ?????????? ????
??? ?????????????? ?? ???, ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ????
??? ?? ?????????? ?????????????? ??? ??? ?????? ??? ?????? :

[...]

?) ??? ?????? ??? ??? ?????? ?????????? ??? ?????? ?????? ?????? ?????????? ? ?????? ?? ????
?? ?????? ??? ?????? ??? ?????? ?? ?? ?????? 194 ??? 197 ??? ?? ?????? 199.

????? 171

1. ? ?????????? ??? ?? ????? ?????????? ??? ???, ??? ?? ????? ?????????????????
??? ?????? ??? ?????? ??? ?????????????? ?????? ?????? ??? ?????????? ? ?????????? ??????
??? ?????????????? ?? ???, ??? ????? ?????????????? ?? ??? ????? ?????? ?????,
????????????????? ?????? ?? ??? ?????????? ?????????? ??? ?????????????? ??? ???
?????? 2008/9/??.

[...]»

5. ?? ????? 3, 5, 7, 15, 19, 20, 21 ??? 23 ??? ?????? 2008/9 ???????, ???????????, ??
????:

«????? 3

? ??????? ?????? ?????????????? ??? ?????????????? ?????????????? ??? ??? ?? ??????????????
??? ?????? ????? ??????????, ? ?????? ?????? ??? ?????????? ??????????????:

?) ??? ?????? ?????? ?????????? ??? ?????????? ??? ?????? ?????? ?????? ?????????? ??? ???
??? ?????????? ??? ?????????????? ? ?????? ?????????? ??? ?????? ?????? ??????
????????????? ?????????????? ?????? ?, ?? ?????????? ??? ?????? ?????? ?????????? ??????
????????? ??????????????, ??? ?????????? ??? ?????? ??? ?????????? ?????????? ????

?) ??? ??? ?????? ?????????? ??? ?????????????? ?????????? ?????? ??? ??????
????????? ??? ?? ?????????? ??? ?????????????? ??? ?????? ?????? ?????? ?????????? ???,
????????? ??? ?????????? ??????:

[...]

(ii) ?????????? ?????? ??? ?????? ?????????? ?? ?????? ??? ?????? ?????????? ?????
????????? ?????? ?????????????? ?????? ?????? ?? ?? ????? 194 ??? 197 ??? ?? ?????? 199
??? ?????? 2006/112/??.

[...]

????? 5

????? ?????? ?????? ?????????? ?? ??? ?????????? ??? ??? ?? ?????????????? ??? ??????
????? ?????????? ?? ??? ?????? ?????????? ??? ?????? ?????? ?????????? ??? ??????
??? ?????????? ?? ??? ?????? ?????? ??? ?????? ?????????? ?? ??? ?????? ?????????? ????
????? ??? ?? ??? ?????? ?????? ??? ??? ?????? ?????? ?????? ??? ?? ??? ?????? ??????
????? ??? ?? ??? ?????? ?????? ??? ?????????? ?????? ??? ?????? ?????? ??????
?????????:

[...]

?) ?????? ??? ?????????? ?? ?????? ?? ??? ?????? ?????? ?????? ?????? ?????? ??????
????????????? ?????? ?????? ?? ?? ????? 194 ??? 197 ??? ?? ?????? 199 ??? ??????
2006/112/??, ??? ?????????? ??? ?????? ?????? ?????? ??????????.

[...]

????? 7

???? ? ? ?????????? ?????????? ?????? ??????????????? ?????? ??? ?????? ?????? ?????? ???????????, ?
????????????? ??? ????? ? ? ?????????????? ??? ?????? ?????? ?????? ?????????? ??????????
????????????? ?????? ?????????? ??? ?? ?????? ?????? ?????? ?????????????? ??? ?? ?????? ??????
????? ?????????????? ??? ?? ?????? ?????? ?????????????? ?????? ??? ?? ?????? ??????????????
?? ?? ??? ?????? ??????.

[...]

????? 15

1. ? ?????? ?????????? ?????????? ??? ?????? ?????? ??? ?????????????? ??? ?? 30
????????????? ??? ?????????? ?????? ??? ?????????? ??? ?????????? ?????????????? . ? ??????
????????????? ?????????? ??? ?? ?????????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??
????????? ??? ?????????? ?? ?????? 8, 9 ??? 11.

[...]

????? 19

[...]

2. ?? ?????? ?????? ?????????? ?????????? ??? ?????? ?????????? ??? ?????????? ??? ?????????? ??
??? ?????? ? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?? ??? ??? ??? ??
????? ?????? ????.

????? 20

1. ?? ?????????? ??? ?? ?????? ?????? ?????? ?????????? ??? ?????? ??? ?? ?????????? ?? ??????
??? ?????? ?????? ?????????? ??? ?????? ?? ?????? ? ?????? ??? ?????? ??? ?????????? ?? ??? ??????
????????? ??? ?????????? ??? ?????? ?????? ?????, ?????? ?? ?????? ??? ?????????? ?? ?????? ??? ??????
????????? ?????????? , ?????? ??? ?????? ?????? ?????? ? ??? ??? ?????????? ?????? ??? ??????
????? ?????????? , ?????? ??? ?????????? ??? ?????? ?????? ??? ?????? 19 ?????????? 2. ??
????????? ??? ?? ?????????? ?????????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
? ?????????? ?????? ?????? ?????? , ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????????
????? ?????? ?????? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ??????.

??? ?????????? ?????????? , ?? ?????? ?????? ?????? ?????????? ?????? ?? ?????? ??? ?????? ??? ??
????????? ??????????.

????? ?????????? ?????????? ??? ?????????? ?????? ?? ??? ?????? ?????????? ?????? ??
????????????? ?????? -?? ?????????? ??? ?? ?????? ?????? ?????????? ?????? ??????
????????? ??? ?? ?????????? ? ?????? ?????????? ?????????? ?????? - ?? ?????????? ?
????????? ??? ?????? ?????? ?????????? ? ?????????? ?????? [...] .

2. ?? ?????? ?????? ?????????? ?????? ?? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ???
??? ?????????? 1 ?????? ??? ?????? ??? ?? ?????? ??? ?????? ?????? ?????? ?????? ?????????? ???
????? ??? ?? ?????? ?????????? ? ?????? ???.

????? 21

????? ?? ?????? ?????? ?????????? ??? ?????? ?????????? ?????????????? , ?????????? ??? ??????????
?? ?????? ??? ?? ?????? ??? ?????? ? ?? ?????? ??? ?????? ?????? ?????? ?????? ??????
????? ??? ?? ?????? ??? ?????? ?????? ??? ?????????? ?????? ??? , ?? ??? ?????? ?????? ??????

???? ?????? ??? ?? ????? ??????? ???????????, ????? ?????? ??? ?? ????? ??? ?????????? ???
????????? ?? ??? 20 ?????????? 2. ??????, ? ?????????? ?????????? ??? ??? ??? ??????
????????? ??? ?? ?????????? ?????? ? ?????? ?????? ?????? ?????????? ??? ??? ??? ??????????
????? ??? ?? ?????????? ?????? ??? ?????? ??? ?? ?????? ?????? ?????? ??????????.

? ? ?????????? ?? ?? ?????? ?????? ?????? ?????????? ?????? ??? ?????? ?????????? ??????????,,
????????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????.

[...]

????? 23

1. ?? ?????????? ?? ?? ?????? ?????? ?????????? ?????????? ?? ?? ?? ?? ?????, ?? ??????
????? ?????????? ?????? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ???
?????.

2. ?? ??? ?????? ?????????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ?????? ?????????? ??????????
?? ?????????? ??? ??? ?????????? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ?? ??? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????
??? ?????? ??? ?????????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????.

???, ??????? ?? ?? ?????????? ??? ?????? ?????? ?????? ?????????? ??? ?????? ?????? ?????????? ??????
?? ??? ?????? ?????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ??? ?????? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????
??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????
?????. ??? ??? ?????? ?????? ?????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????».

?? ??????? ??????

6. ?? ?????????? ?? ?? 19 ?? 21 ?? ?????? 2008/9 ?????????? ??? ??????
????? ?? ?? ??? 251/C, 251/E, 251/F ??? 251/G ??? az általános forgalmi adóról szóló 2007.
évi CXXVII. törvény (????? CXXVII ??? 2007 ??? ?????? ?????????? ???) (6).

7. ?????? ?? ?? ?????? 49, ?????????? 1, ?????? b, ??? az adóigazgatási rendtartásról
szóló 2017. évi CLI. törvény (????? CLI ??? 2017 ??? ?????? ??? ?????????? ??????????,
??? ????: ?????? ??? ?????????? ??????????) (7), ? ?????????? ?????????? ?????????? ??????????
?? ?????????? ??? ? ?????? ??? ?????? ?? ?????? ??? ?????? ?????????? ?????????? ?????????? ???
????????? ???, ?? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????????? ??? ??????.

8. ?? ?????? 124 ??? ?????? ??? ?????????? ?????????? ?????????? ?? ?????????? ?? ??????????
????????? ??? ?????? ??? ?????????? ??? ?????????? ?????? ?????? ?? ??? ?????????? 3 ???
????? ???, ??? ?????? ??? ?????? ??? ?????? ?? ?????? ??? ?????? ?????????? ??????????
????????? ??? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ??? ??
????????? ??? ??? ?? ?????????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???, ??? ??
??? ??????.

9. ?????? ?? ?? ?????? 78, ?????????? 4, ??? a közigazgatási perrendtartásról szóló 2017.
évi I. törvény (????? I ??? 2017 ??? ?????? ?????????? ??????????) (8), ? ??????????
????? ?? ?????????? ?????? ??? ?????????? ?????? ?????????? ?????????? ?????????? ?? ?????? ???
????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???, ?? ?????? ???

????????????? ?????? ?????????? ?? ?? ?????? ??????, ?????? ??? ?? ?????????? ?? ?
????????? ??? ?? ?????? ?? ?????? ?? ?????? ?????????????? ?????? ??? ?? ??????????.

?? ?????????? ?? ??????????, ? ?????????? ?? ?? ?????????? ?????? ??????????

10. ? ??????? Slovenské Energetické Strojárne A.S. (??? ????: SES), ?? ??? ?? ????????,
????????????????? ??? ????? ?? ?????? ??? ?????????? ?????????? ??? ??????????
?????????????. ?? 2020, ? ??????? ??????? ?????????? ?????????? ?????????????? ??? ??????????
?? ?????? ??????? ?????????? ?????????? ??? Újpest (????????). ??? ??? ?????????? ???
?????? ??? ?????????? ???, ??????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??????????
???? ???????.

11. ???? 18 ??????????? 2021, ? SES ??????? ??? Nemzeti Adó- és Vámhivatal Kiemelt Adó- és Vámigazgatósága (?????? ?????????? ??? ?????????? ?????????? ??? ??????? ?????????? ??? ??????? ?????????? ??? ?????????? ??? ??????? ??????? ??? ??????? ??????? ???, ?????????? ??? ?????: ?????????? ??? ?????????? ??? ??????? ???), ?????? ?????????? ??? ?????? 37 013 654 ?????????? ?????????? (HUF) (97 400 ??? ??????), ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ?? 2020.

12. ???? 22 ??????????? 2021, ? ?????????? ?????????? ??? ?????? ?? SES ??
?????????? ???? ?????????? ??? ?????? ?????? ?????? ??? ?????????? ?? ???
????? ?????????? ??? ??? .? SES, ???????? ?????? ??? ?? ??? ?????? ?? ??????????
????, ??? ?????? (9).

13. ????? ??????????, ?? ??????? ??? 6?? ????? 2021, ? ?????????????? ??????????? ???.
????????? ?? ?????????????? ??? ?? ?????????? ?? SES ??? ?????????? ?? ?????? ???
?????? 49, ?????????? 1, ??????? b, ??? ?????? ??? ?????????????? ??????????.

14. ???? 9 ??????? 2021, ? SES ?????????? ??? ?? ??? ?????? ??????? ??? Nemzeti Adó- és Vámhivatal Fellebbviteli Igazgatósága (????????? ?????????? ??? ??????? ?????????? ??? ?????????? ???, ?????????? ??? ?????: ?????????????? ?????????? ???), ?????????? ?????????? ??? ?? ?????? ??? ?????? ? ?????????? ? ?????????? ?????????? ???.

15. ?????????? ??? 20?? ??????? 2021, ? ?????????????? ?????????? ??? ?????????? ???
????????? ??? ?????????????? ?????????????? ????. ? ?????????????? ??? ??????????,
??????????, ??? ?? ?????????? ??? ?????????????? ?????????? ??? ?????????? ???
?????????? ??? ?????????????? ?????????? ??? ?????????? ??? ?????????????? ??????????, ??
????? ? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????????????? ??????????, ??? ???
?????????, ?????? ??? ??????? ??? ?????? ??? ?????????? ???.

16. ? SES ??????? ?????????? ??? ?????? ?????????????????? ?????????? ?????????? ??? F?városi
Törvényszék (????????????? ??????????????, ?????????), ?????????? ?????????????? ??? ???? ???
????? ???????. ? ??????? ??? ?????????????? ??? ?????????? ??? ?????? 124, ?????????? 3,
??? ?????? ??? ?????????????? ??????????, ?? ?????????????? ??? ??? ?????????? ??? ???
????????? ?? ??? ????? 2008/9, ?????? ?????? ??? ?????????????? ?? ?????????? ?????????? ???
????????????? ??? ?????? 23, ?????????? 2, ??? ??????. ?????????, ?????????????? ??? ????
????????? ??? ??? ?????? ??? ?????? ?? ?????? 20, ?????????? 1, ??? ???? ??????, ???
????? ??????????????. ?????????, ? ?????????????? ?????????? ??? ?????? ??? ???? ?? ?????
124, ?????????? 3, ??? ?????? ??? ?????????????? ?????????? ?????????? ?????????? ??? ????
????????? ?????????? ??? ????. ?????? ??? ?????? ??? ?????? ??? ??? ?????????? ??? ???? ???? ???? ?
????? ?????????? ?? ?????????? ??? ?????? ??? SES ?? ?????????? ??????????, ??????????
?? ?????? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ??? ?????????????? ???

17. ??? ??? ????????, ?? F?városi Törvényszék (????????????? ????????????)
????????? ?? ?????????? ?? ??????? ?? ?????????? ?? ?????????? ?? ?????????? ??
????????? ?????????? ?? ??????????:

«1) ????? ?? ?????? 23, ??????????? 2, ??? ?????? [2008/9] ??? ?????? ??? ?????? ?????? ??????
?? ??? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ?? ??? ?????? ?????????? ?????? ??????????
-?????????????, ?? ?????? 124, ?????????? 3, ??? [????? ??? ?????????????? ??????????] – ?
?????, ??? ??? ?????? ?????? ??? ?????????? ?????????????? ??? ?????? ?????????????? ?????? ???
??? ?????? [2006/112], ??? ?????????? ?? ?????????? ??? ?? ?????? ??? ?????? ??? ?????????? ???
????????? ?????????? ??? ?? ?????????? ?? ?? ?????????? ??? ?????? ?????????? ??? ??????????????
????????, ?? ?????? ? ?????, ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????????? ?? ???
?????, ??? ?? ?????????? ?? ?? ??????????, ?????????? ??? ?????? ??? ?????????? ??? ?? ??????????
????, ??? ? ?????? ?????????? ???' ?????? ??? ?????? ?????????? ?????????? ??? ??????????
????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ?????????? ?????????? ??? ?????? ??? ??????
?????? 2008/9;

2) ??? ?????????? ??????????? ?????????? ??? ?????? ???????, ?????? ?? ???????
????????????? ? ?????????? ??? ?????? ?????? ??? ?????? ?? ?????? 20, ?????????? 2, ???
?????? 2008/9; ?????? ?????? ?? ?? ?????????? ??????????? ?????????? ???????
????????? ?????????? ??? ?????????? ??? ?????????? 47 ??? ?????? ??? ??????????
????????? ??? ?????????? ?????? [(??? ????: ??????) – ??? ?? ?? ????? 167, 169, 170 ???
171, ??????? 1, ??? ?????? [2006/112], ?????? ??? ?? ??? ?????????? ?????? ???
????????? ???????????, ??? ?????????????????? ??? ??? ?????????????? ???, ???
????? ??? ?????????? ?? [?????????????];

18. ? ??????? ?????????????? ?????????? ?????????? ??? ?????????? ??? ?????????? ??? 6 ??????????
2022. ??????? ?????????????? ?????????? ? SES, ? ???????, ?? ?????????? ??? ??????????
?????? (10), ??? ? ??????? ??????. ?? ?????????? ?????????? ?? ?????????? ??? ?????????? ???
????????? ?????? ?? ?????????? ??' ?????????? ??????.

???????

19. ?? ?????? ?????????????? ??? ?????? ?????? ?????????? ?????????? ??? ?????????????? ???
????????????? ??????????, ?? ??? ?????? ?? ?????? ?????? ?????? ?????????? ?????????? ??? ???
??????? ??? ?????????? ??? ?????? ??????. ??????, ?? ?????????? ??? ?????? ?????? ??? ??? ??
????????? ?????????????? ??????, ?????????? ??? ? ?????????? ??? ?????? ?????? ??? ??????
????? ?? ?????????? ??? ?? ?????? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ??
????????? ??? ??? ?????? ?????? ??????????.

?? ? ? ?????????? ?????????????? ??????????

20. ?? ?????? ?????????????? ??? ?????? ??? ?????????? ?????????? ??? ?????? ??? ??????
????? ?? ?????? ??? ?????? ?????? ?????? 20, ?????????? 2, ??? ?????? 2008/9
????????? ??? ?????? ?????? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ???
????????? ??? ?????? ?????????? ??? ??? ?????? ?????????? ?????????? ?????????? ???
????????? ??? ?????? ?????? ?????? ??? ?????? ?????????? ??? ?????? ?????????? ?????????? ??
????????? ?????????? ???, ?????? ?? ? ? ?????? ??? ?????? ?? ?????? ?? ?????? ?? ?????????? ??
????????? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ?????? ??? ?????? ??? ??
????? 47 ??? ?????? ??? ?? ?????????? ?????? ??? ?????????? ??? ?????? ??? ?????? ???
????? ??? ????. ?? ?????? ?????????? ?????????? ??? ?? ?????? ?????????? ?????? ???
????????? ?????????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???
????????? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???, ??
????????? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???

? ?????? Sea Chefs Cruise Services

21. ? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????? 20, ?????????? 2, ???
????? 2009/9 ?????????? ??? ?????? ??? ?????? ?????? Sea Chefs Cruise Services.
?? ??? ?????? ???, ?? ?????????? ?????? ??? ?????? ??? ? ?? ??? ?????? ?????????? ???
????????? ?????????? ?????? ??? ?????? ??? ? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? ?????????? (11).

22. ? ?????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ???
????? 2008/9 (12). ?? ?????????? ??? ?????? ??? ? ?????? ?????? ?????? ??????????
????????? ??? ?????? 20, ?????????? 1, ??? ?????? 2008/9 ?????? ??
????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? (13).

23. ??????, ?? ?????????? ???, ?????????? ???, ?????? ?? ?? ?????? 23,
????????? 2, ??? ?????? 2008/9, ? ?????????? ??? ?????? ?????? ?? ?????????? ???
??? ?????? ??? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????
??? ?????? 20, ?????????? 2, ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????
????????? ?? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????
????? ?????????? ??? ?????? ?????? ??? ?????? ?????? ?????? (14). ?????? ?? ?????? ????
????????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???
????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???

?? ?????? ??????? ?? ??????????? ?? ????? ?? ??????????? ?? ????? 20, ??????????? 2, ???
?????? 2008/9.

24. ?????? ??????? ??? ??? ?????? Sea Chefs Cruise Services ?? ?????????? ???????
?????? ?? ?????????? ??? ?????????? ?????? ?? ?????????? ?????? ?????????? ??????????
????? ?? ?????????? ?????? ??? ?????? ?????????? ??????. ?????? ??? ?????????? ???
????????? ?????????? ??? ?????? ??? ?????? ?????? ??? ??????, ??? ??? ?????? ?????? ?????????? ? ??
????? ??????, ??? ??? ??? ?????? ?????? ??? ?????????? ?????? ??????????. ??????, ??
????????? ?????????? ??? ??? ?????? ?????? ??? ?????????? ??? ?????? ??? ?????? ?? ?????????? ???
??? ?????? ??? ??? ?????? ?????? ??? ??????, ?? ??? ?????? ?????????? ??? ?????? 23,
????????? 2, ??? ?????? 2008/9 (15). ? ?????? ??? ?????? ???, ??????, ??? «????
????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????», ??? ?????? ?????? ???
????????????? ??? ?? ?????????? ??? ??? ?? ?????????? ??????. ?????
????????????? ??? ?? ?????????? ??? ?????? ??? ?????? ??? ??????????, ?????? ?? ?? ??????
? ?????????? ??? ?? ?????? ??? ?????? ?? ??? ?????? ??? «????????? ?????????? ??? ?????? ???
?????????» ??? ?????? ??? ?????? ?????? ??????, ?? ?????? ??? ?????????? ???
????? Sea Chefs Cruise Services ?????? ?????? ??? ?????? ??? ?????? ?????? ??????????,
????? ??? -????? ??? ??? ?????? ??????- ?? ?????????? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ???, ?????? ?????? ?????? ?????????? ?????? ?????????? ??? ??
????? ?????? ??? ?????? ?????? ?????? ??????????.

25. ???????, ??? ????? ?????? ??? ?????????? ?????????????? ?????????????? ?????????? ??
????? ? ???????? ???, ?? ??? ?????? ?????? Sea Chefs Cruise Services, ??? ?????? ??
????????? ?????????????? ? ?????????? ??? ?????? ?????? ??? ?????????????? ??? ?????? 20,
????????? 1, ??? ?????? 2008/9.

???? ???????? ? ??????? GE Auto Service Leasing

27. ??????, ? ?????? GE Auto Service Leasing ??? ??????? ??? ?????? ???
????????? ??? ?????? 2008/9, ??? ?? ???????? ??? ?????????????? ?????? 79/1072/???
(17). ? ?????? ?????? ??? ?????????? ?????????????? ??? ??? ?????? 2008/9. ??????????
????????? ??? ??? ?????????????? ?????????? ??? ??? ?????????????? ??? ??? ???, ???
????????????? ??? ?????????? ??? ??? ?????? ?????? ?????????? ?????????? ??? ??? (18). ??????
????????? ?? ?????? ??? ?????? ??? ?????????? ??? ?????????? ?????? ??? ?????? ?????????? ?????
??? ??? ??????????????, ?? ??? ?????? ?????????? ?? ?????????? ??? ?????? ??????. ???
????????? ???, ??? ?? ?????? ??? ?????? ??? ??????, ?? ??? ?????? ??? ?????????????? ??
??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????????????? ??? ??? ??????????????.

28. ????????, ? ?????? ??? ?????????? ?????? ??? ?????? ?????? ??? ?? ?????? ?????? ?????? ?????? ?????? GE Auto Service Leasing ?????? ??? ?????????? ??? ?? ?????? ?????? ??? ??

????????? ??? ? ??? ? ?????? 79/1072 ??? ?????? 3, ?????????? ?? ?????????????????? ???
?????? ????????????, ??? ?????????????? ??? ?????????? ?? ?????? ?????????? ? ??????, ???
??? ?????????????? ?????? ?????????? ??? ? ?????????? ?????? ??? ???? ?????? ??????
????????????? ??? . ?????? ?? ??? ?????????? ??? ???? ??????, ? ?????????? ??? ?? ???
????????? ??? ?????? ?????????? ?????????? ??? ???? ??????, ??? ??? ?????????? ???
????, ??? ?????????? (19). ? ? ?????????? ??? ?????????? ??? ?????? ?????? ??????????
????????? ?? ?????????? ??? ??????????.

29. ??????????, ? ?????? ?????? ?????????? ?????????? ?????????? ??? ?????? 20,
????????? 1, ??? ?????? 2008/9 ?????? ?? ?????, ??? ?????????? ??? ??? ??? ??? ??? ??
????? ??? ??? «?????????», ?????????? ? ?????? ??? ?????? ? ?????????? ??? ??????
????????? ??? ?????? ?????????? ?????? ?? ???? 8 ??? 10 ??? ??????, ??? ???
????? ??? ?????? ?????? ??? ???? ??????, ??? ??? ?????? ???' ?????? ??? ?????? ???
????????? (20).

30. ??????, ??? ?????????? ??? ?????????? GE Auto Service Leasing, ?? ??????????
????????? ??? ?????????? ??? ? ?????????? ??? ?????????? ??? ?????? 79/1072 ?????? ??
??? ?????? ??? ?????? ?????? ??? ???? ?????????? ??? ?????????? ?? ?????? ???
????????? ??? ??? ?????????????? . ?? ?????????? ?????????? ??? ???, ???
????? ??? ?????? ??? ???? ?????? ??? ???? ?????? ?????? ? ?? ??? ??????, ??? ?????????? ???
? ?????? ??? ?????????? ?????? ??? ???? ?????? ?????? ??? ??? ?????? ?????? ??? ?????? ???
????????? ??? ?????? , ?????????? ??? ???? ??? ?????? ??? ?????? ?????? ?????? ???
????? ??? ?????? ?????????? . ?????? ?????????? , ??? ?? ??? ??? ???, ??? ? ??????
??? ?????????? ??? ?????????? ?????? ?????? ?????? ??? ?????? ?????? ??? ???
????????? ??? ?????????? ??? ???? ?????? ??????, ??? ??? ?????? ??? ?????? ???
????????? ??? ???? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ???.

31. ?????? ??? ?????????, ?? ?????? ??? ?????? GE Auto Service Leasing ??
????????? ??? ??? ?????? ?????? ?????? ??? ?????? Sea Chefs Cruise Services, ?
????? ??? ?????? ?????????? ??? ??? ?????? ?????? , ??????????, ??? ?? ??? ??? ???,
??? ?? ?????????? ?????? ??? ?? ??? ?????? ??? ?????? ?????????? ???,
????????, ? ?????? GE Auto Service Leasing ??? ?????? ?? ?????? ?????????? ???
????????? ?? ?????????? ??? ?????? Sea Chefs Cruise Services.

? ? ?????? ??? ?????????? ??? ?????? 20, ?????????? 2, ??? ?????? 2008/9 ?? ?? ???
47 ??? ???

32. ?? ?????? ?????????? ??? ?????? ?? ?????? ??? ?????????? ??? ?????? 47 ??? ??? ??
????????? ??? ?????? ??? ???? ?????? ??? ???? 20, ?????????? 1, ??? ??????
2008/9, ?????? ?? ?????? ?????????? . ?? ?????? ??? ?????? ??? ?????? ??? ??????
??? ?????? ?????? ??? ?????? ?????????? ??? ?????? , ??? ?????? ?????? ???.

33. ????? ?????????????? ?? ?????? ?? ?????????? ???, ??? ?? ?????? ???, ? ??????????
??? ?????????? ??? 20, ?????????? 2, ??? ?????? 2008/9, ?????????? ??? ??
????? ?????????? ? ?? ?????? ?? ?????????? ?? ?????? ??? ?????? ??? ?????? ???
????? ???, ??? ?????? ??? 47 ??? ???.

34. ?? ???, ??????????, ??? ?????? ??? ?????, ?????????? ?????????? ??????????,
????????????? ??? ?????? ??? ?????? ?????????? ?????????? ??? ??? ?????? ???
????????????? ??? ?? ?????? 47 ??? ?????? ?????????? ?????????? ?????? ??????????,
????? ??? ? ?????????? ??? ?????? ?????? ? ?????? , ?????? ?????????? ??? ??
????? ??? ??? ? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ???
????? ??? ?????? ??? ?????? ?????? (21), ? ?????????? ?????? ??????????

????? ??? ?????? ?? ??????? ?????????? ???????? ??????????????. ??????????, ?? ?????????? ???
?????? ?? ?????????? ?????? ??? ?????? ??? ?????????? ?????? ??? ?????? ??? ?????????? ???
????????? ?? ??????, ?? ?????? ?????????? ?????? ??? ?????????? ??? ?????? ??? ?????????? ??
????????? ?????? ?????????? (22). ?????? ?? ??????, ? ?????????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?????, ?????? ??? ?????? ?????????????, ??? ?????? ?? ?????? ?? ?????? ??
????????? ?????? ??????????, ?????? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??
????? ??? ?? ?????????? ?? ??????????, ?????? ??? ?????? ??? ?????? ??? ?????????? ???
????? ??? ?????? ??? ?????????? ???.

? ?????????? ??? ?????? ?????????? ?????????? ???.

35. ??? ?????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???
?? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ???, ?? ?????? ??? ?????? ???
????? ??? ?? ??? ??? ?????? ??????, ??' ?????? ??? ?????? ??? ?????? ???
????????? ?????? ?????????? ??????, ??????, ?? ?????? ??? ?????? ?????? ??????????????
????? ? ?????????? ??? ?? ?????? 20, ?????????? 2, ??? ?????? 2008/9 ??? ?? ??????
??? ??? ?????? ?? ?????????? ?????????? ??? ?????? ??? ?????? ??? ?????? ???
????? ??? ??? ??? ?????? ?????????? ??????????, ?????? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???
????? ?????????? ??? ?????? ??? ?????? ???.

??? ??? ?????? ?????????? ?????????? ???.

36. ?????? ??? ?????? ?????????? ?????????? ??? ?????? ?? ?????????? ?? ??????
????????? ?? ?????????? ?? ?????? ??? ?????? ??? ?????? ?????? ?????????? ?? ??????
????????? ?? ?????????? ??????, ??? ?????? ??? ?????????? ?????? ??????, ??????????
????????? ?? ?????????? ?? ?????? ??? ?????? ?????? ??? ?????? ?????????? ?????? ???,
??? ?? ?????? ?? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????????? ???.

37. ? ?????????? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? 23,
????????? 2, ??? ?????? 2008/9. ??????, ? ?????? ??? ?????? ?????? ??? ?? ???
????????? ??? ?? ?????????? ??? ?????? ?????? ?????????? ??? ?? ??? ?????????? ??? ?? ???
????? ?????????? ??? ?? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?? ???
????????? ??? ?? ?????? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?? ???
????????? . ??? ??????, ?????? ??????, ?????????? ?? ?????? ?????? ?????? ?????? ??? ?? ???
?????????, ?????? ?????? ?? ?????? ?????? ?????? ??? ?? ??? ?????? ??? ?????? ??? ?? ???
????? ??? ?????? ??? ?????? ?????? ??? ?? ???, ??? ?????? ??? ?????? 170 ??? ??????
2006/112, ??? ?????? 20, ?????????? 2, ??? ?????? 2008/9, ??? ?????? ??? ??????
????????? ??? ??? ?????????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ???
????????? . ?? ?????? 170 ??? ?????? 2006/112 ??? ?? ?????? ??? ??????????????????
?? ??? ?????????? ?????? ?????????? ?????? ??????, ??? ??????, ??? ?? ?????? ??????????
?? ?????? ?????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ???
????????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????? ??? ?????? ??? ?????? 36 ??? ?????? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???
?????????.

? ?????? ?????? ?????????? ??? ?????????? ???.

38. ??? ?????? ?????? ?????????? ??? ?????????? ?? ?????? ??? ?????? ???

? ?????????? ??? ???? ?????????????? ?? ???? ?????? ??????, ?? ?????? ?????????????? ???
????? 170 ??? ??????? 2006/112, ?????? ?? ?????????? ??? ?????????????? ??? ?????? 168
??? ??????? ?????????? ??? ??????? ??? ?????? ?????????? ??? ?????? ??? ?????? ????.
????????? ??? ?????????? ??? ?????? ??? ?????? ?????????? ???, ? ?????? ?????? ??? ?????? ????
??? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ?? ?? ??????, ???
????????? ??? ?????????? ?????? ?????????? ?????????? ??? ?? ?????? ?????????? ??????????, ???????,
????????? ??? ?????? ??? ?????? ?????????? ??? ??? ?????? ??? ??????, ???????, ?? ?????????? (23).

39. ? ??? ???? ?????????????? ??????????, ??????????, ?? ?????????????? ???
????????? ??? ?????? ?? ?????????? ?????????? ? ?????????? ??? ?????? ??? ?????? ??? ??????
????? ?????????? ?? ?????????? ?????????? ???, ??? ?????? ?? ? ?????????? ????
????? ?????????? ?? ?????? ?????????? ?????? ??? ?????? ?????? ?????????? ??? ?????? ???
????? ?????? ??? ?????????? ??? ? ?? ?????? ??? ?? ?????? ?????? ?????????? ?????? ???
????????? ?? ?????????? ??? ?????? ?????????? ?????? ??? ?????? ?????? ??? ?????????? ???
????????? (24). ??? ?????? ?? ?????? ?????? ??? ?????? ?? ?????? ?????? ???
????????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????????? ?? ??????????
????????? ??? ?????????? ??? ?????????? ???, ?? ?????????? ??? ?????? ??? ? ??????????
????????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????? ?????? ?????????? ???
????????? ???' ?????????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ?????? ?????? ?????? ???
????????? ???, ??? ?? ?????????? ??? ?????? ??? ?????? ?????? ?????? (25).

40. ???????, ?? ??????? ??? ??? ?????????? ??? ?? ?????? ??? ??????, ?? ??????
????????? ??? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????? ??? ?????????? ???, ??????
?? ??? ??? ??? ?????????? ??? ?????????? ??? ?????? ???, ??? ?? ?????? ?????? ????
????? ????, ?? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ??? ???
????????? ????. ?????? ?? ??? ?????? ???, ?? ?? ??? ?????????? ??? ??????
?? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ??????
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??????
??? ?????? ??? ?????? ?????? (26).

41. ???, ??? ??? ?????????? ??? ?????? ??? ?????? ??? ?????????? ??? ?????? ??? ??????
????????? ???, ?? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ???, ??????
????????? 2, ??? ?????? 2008/9 ??? ?????? ?????????? ?????????? ???, ??????, ?
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? (27).

42. ?? ??? ?????????????? ??? ?????? ???, ??????, ?? ?????????? ??? ?? ??? ?? ??
??? ??????.

????????? ??? ?????? ??? ??????

43. ??? ? ?????????? ??? ?????????? ??? ?????? 38 ??? 40 ??? ?????? ??? ??????
????????? ??? ?? ?????????? ??? ?????? ?????????? ?? ?????????? ?? ?? ?????? ???
????? ?????? ?????? ??? ?????? ??? ?????? ???, ? ?????? ??? ?????? ??? ?????? ???
????? ?? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????? ??? ?????? ?????? (28), ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?? ??
????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??
????????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? (29). ?? ?????????? ??? ??????

????????? ??? ?????????? ?????? ?? ?? ?????? ??? ?????? ?????? ?????? ??? ?? ?????????? ??????????
??? ?????????????? ??? ?????????????????????? ??? ?????????????? (30), ??? ?????????? ???
????? ?????????? ??? ?????? ??? ?????? ??? ?????? ??? ?? ??? ??????????????.

44. ?????????????? ??????????? ?? ??? ????? ????? ????? ?? ?????????????? ????? ?? ?????????? ?????? ???? ?????
?????? , ?????????????? ??????? ?? ??????? ??????????????, ??? ?????????????? ?? ?????????????? ?????? ??????????????
????? , ??? ?????? ? ?????????? ??? ?????????????????? (31), ??? ??? ?? ??????????
?????????. ??? ?????????? , ??? ????? Nec Plus Ultra Cosmetics, ?? ??????????
????? ??? «? ?????? ?????????????? ?????????????? ?????????? ?? ?????????? ?????????? ?????????? ?????????? ???
???????? [...] ?????? ?????????? ?????? ?????? ?? ?????????? ?????????? ?????????? ?????????? ??? ??????
??? ?????????? ??? ?????????? ??? ?????? ?????? ?? ?????????? ?????????? ?????????? ?????????? ??? ??????
????????? ??? ?????????? ??? ?????? ?????? ?? ?????????? ?????????? ?????????? ?????????? ??? ??????
?? ?????????? ??? ?????????? ?????????? ??? ?????? ?????? ?????????? ?? ?????????? ??? ?????????? ??? ??????
??????, ?????? ?????? ? ?????, ??? ?????? ??? ?????? ?????????????? ?????????? ???????, ???
????????? ??? ?????????? ?????? ?????? ?? ?????????? ?? ?????????? ?????????? ?????? ??????????????
????????? ??? ?? ?????????? ?? ?????? ?????? ??? ?????? ?????????? ?? ?????????? ??? ?????????? ???
????????? ??? ?????????? ?????? ?????? ?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???
????????? ??? ?????????? ?????? ?????? ?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???
????????? ??? ?????????? ?????? ?????? ?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???
????????? ??? ?????????? ?????? ?????? ?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???
?? ?????????? ??? ?????? ?????? ?????? ?? ?????????? ?? ?????????? ??? ?????????? ??? ?????????? ???
????????????? ?????? ?????? ?????? ?????????????? ?? ??? ??? ?????? ??? ?????????????? ??? ??

45. ??????????, ??? ???? ????? ??, ??? ?????????? ??????? ?? ??? ????? ?????????? ??? ??
????? ??????. ? ?????????? ?????????? ??????? ?? ???? ?? ?????????? ??? ?? ?????? ??
????????????? ??? ?????? ?????? ?????? ?????????? ?????????? ?????? ?????? ?????? ??
????? 2008/9. ?? ?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?? ??????
????????? ?????? -??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?? ?????? ??
????? ?? ?? ?????? ??? ?????????? ??? ?????????? ?????? ?????? 20, ?????????? 2, ??? ??
????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? - ?? ??
????????? ??? ??????, ??? ??? ?????? ??? ?????? ?????? ??????????, ??? ?????? ???
????????? ??? ??? ???????????????????, ?? ?????????? ??? ?????? ?????? ??
????????????? (effet utile) ??? ?????????? ??? ?????? ?????? ?????? ? ?????????? ???
?????.

46. ????? ?????? ??? ??? ????? ??????????????, ? ?????????? ??? ?????????????? ??? ??????
?????????? ?? ??? ??? ????? ?????????????? ??? ?????????? ??? ?????????? ?????????????? ???, ??
?? ??????, ?????? ?? ?????????? ??? ?????????????? ??? ?????????????? ??? ?????????? ??????. ???
????? ?????????? ??? ??? ????? ?????????? ??? ??????????, ???????, ??? ? ??? ?????
???????????, ?????????? ??? ?? ?????????????? ?????????? ??? ?????????? ?????????????
????????? ?? ??????????????, ???????, ??? ?????????????? ??????????????. ??? ??? ??? ????? ??????,
????? ??? ?? ?????????? ??? ?????? ?? ?????? ??? ?????????????? ??? ?? ?????? ?? ??
????????????? ??? ?? ??? ????? ?????????? ??? ?????? ??? ?????? ??? ??????????????????.

????? ?? ??????? ??? ?????????? ??? ?????? ??? ?????????? ??? ?????????? ? ?????????????? ??? ?? ?? ??
??????? ????. ????, ???, ?? ???????????, ??? ?????????????, ?? ?????????? ??? ?? ?????????? ??? ??????????
????? ?? ?????????????? ??? ?????? ??? ??????? ??? ?????? ?????????????? ??? ?? ??????
????????? ??? ?????????? ??? ?????? ?????? ?????? (34). ??? ?????? ??? ?????? ?????? ?????? ??????
????????????? ??? ?????? ?? ?????????? ??? ?????????? ??? ?????? ??? ?????? ??? ??????
????????????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????.

48. ? ?????? 2008/9 ?????? ??? ????? ?????????????? ???????????, ??? ?????? ???????
?? ?????? ??? ?? ??????? ??????? ????, ??? ??? ?? ?????????????? ??????????? ??? ??
????? (35). ??????, ?? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ??
????????? ??? ?????? ?????? ? ?????????????? ????, ? ??? ?????????? ?? ?????????? ??
?? ?? ?????????? ??? ?????? ?????? ??? ??????. ?? ?????????? ?????? ?????????? ??????????
???? ?????????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ???, ??? ??
????????? ?????? ?????? ?????????????? ?? ?????? ?????? ?????????, ?? ??? ?????? ??? ??????????
?? ?? ?????????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?? ??
????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? ?????? ?? ??
????? ?? ?????????? ??? ?????? ??? ?????? ?????? ?????? ?? ?????? ?? ?????????? ?????? ?? ??
????????? ??? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? 20, ?????????? 2,
??? ?????? 2008/9 ???????, ??? ?? ?????? ???, ??? ??????. ??????, ???????, ?????????? ??????
??? ??? ?????????? ??? ?????? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ??????
????????? ??? ?????????? ??? ?????? ?????? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??????
????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ??????
????? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???
????????? ??? ?????? ?????? 21 ??? ??????. ???????, ??????, ??? ?????????? ?
????? ??? ?????? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????, ??? ??? ?????? ??????
?????.

49. ??????, ??? ?????? ?? ??????????, ?? ?????????????? ??????????
????????? ??? ?? ?????????? ??? ?????????? ??? ?????? ?????? ?????? ?? ?? ?????? ??????????
??? ?????????? ??? ?????? ?????? ?????? ?????? ???' ?????? (36). ?? ?????? ?? ??
????????? ??? ?? ?????? ?????? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??????
????????? , ? ?????? ?????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??????
????????? ?????? ??? ?????? ?????? ?????? ??? ?????? 15, ?????? 1, ??? ?????? 2008/9, ?
????, ??? ?? ?????? ??? ?????? ?????? , ?????? ?????? ?????? ?????? (37), ??? ?
?? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ?????? . ???, ? ??????????
???? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? , ??? ?? ?????? ??? ?????? ??? ??????
????????? ?????? , ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????? ?????????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????.

50. ???????????, ??????, ??? ?????? ?? ?????? ?????? ?? ?????? ?? ?? ?????? ??? ??
????????? ???, ? ?????? ??? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ??
????????? ?????? ?????? ?????? , ??? ?? ?????? ?????? ?????? ??? ?? ?????? ??? ??
????? ????, ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??
????????? . ?? ??? ?????? ?????? , ??????, ?? ?????? 26, ?????? ??????, ??? ??????
2008/9 ?????? ?? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ??
????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ?????? ???, ???, ?? ?? ??????, ?? ??????
?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ??
?????, ???, ?? ?????? ??? ?????? ?????? ?????? ?????? ?????? ??? ?????? ?????? ??? ??.

????????????? ??? ????? ??????????? ??? ????? ???? ?????????? ?????????? ???????, ?? ??????
????????? ??? ??? ????? ??????????? ???.

51. ???, ???, ??????????? ??????? ??? ??? ??????????? ??? ?????? ?????? ???? , ????, ???
?????? ??? ?????????????? ???????????, ??????????? ??? ??????????? ??? ??????????? ???
??? ??? ??????????, ?????????? ??? ?????? ??? ?????? ?????? ?? ?????????? ??? (38), ??
????????? ?? ??????? ??? ?????????? ?????? ???????????, ?????? ?????? ??? ??????? ???
????????? ??? ?????????? ??? ?????? ??? ?????? ???????????, ?????????? ???
????????? ?????? ??????????, ??? ?????? ?????? ??????, ??? ?????? ??? ??????????
?????????. ?????????? ?? ??? ?????? ?????? ??? ?????????? ?????? ?????????? ??? ??????? ???
????? ?????????? ???, ?? ?????? ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?? ???
????????? ??? ?? ?????? ??? ??????, ?????????, ?? ?????????? (39). ???????, ?
????????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??????, ?????? ?????????? ??
????????? ?????? ???, ?? ?????? ?????? ?????? ?????? ?????? ?????? ?????? 170 ???
?????? 2006/112, ?????? ?? ??? ?????? ??? ?? ?????????? ?????? ??? ?????? ??? ?????? ???
????????? ?????? ?????? ?????????? ?????? ?????? ??????.

52. ?? ?????????? ??? ?????? ??? ?????????? ??? ?? ??????? ??? ???? ?????????? ??? ?????
???? ?????????? ?? ?????????? ?? ?????????? ?? ?????????? ?????????? ?????????? ??? ??????????
?? ??????? ??? ?????? ?????????? ??? ??? ?????? ?????? ?????? ?????????? ??? ?????????? ???
????? ? ?????????? ??? ?????? ??? ?????? ?????????? ?? ?????????? ?????????? ??? ??????????
????????? ??? ??? ?????? ??? ?????? ?????????? (? , ???? ???? ??? ?????? ??????, ??? ??????)
??? ??? ?????????? ??? ??????????) ?????????? ?? ?????????? ?????????? ?????????? ??????????
????????? ??????, ??? ?????? ?????????? ??? ?????????? ?????? ??? ?????????? ??? ?????? ???
????????? ??? ?????? ??? ?????????? ?????? ?????????? ??????.

53. ??????, ??? ??????? ??? ?????? ??? ?????????? ??? ?????? ??? ?????? ??? ?????? ?? ??????
??????????, ?? ?????????? ?????? ??? ?????? Sea Chefs Cruise Services ??? ?
????????? ??? ?????????? ??? 20, ?????????? 2, ??? ?????? 2008/9 ??? ??????
??????????, ?? ?????????? ???? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???
??????????, ??? ?????? ?????? ?????? ?????????? , ?????????? ??? ?????? ??? ?????? ???
??????????, ??? ?????? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??????????, ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
??????????, ??? ?????? ?????? ??? ?????? ?????? , ??? ?????? ?????? ??? ?????? ??? ??????
??????????, ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
??????????, ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ??????
????????? 20, ?????????? 2, ??? ?????? 2008/9, ??? ???? ?????????? ??? ?????? Sea Chefs
Cruise Services (41).

? ?????????? ??? ??????????

55. ??????? ?? ????????????????, ?????????? ?? ?????? ??? ????? ?????????????????? ??????? ?
????????? ??? ?? ?????? 170 ??? ?????? 2006/112, ?? ?????? 20, ?????????? 2, ??? ??????
2008/9, ?????? ??? ?? ?????? ??? ?????????????????????? ??? ?? ?????????????? ??????????????
????? ??? ?????? ??? ?????????????? ??? ?????????? ?????? ?????????? ??? ?????? ?????? ???
????????? ?? ?????????? ?????????? ?? ?????? ??? ?????????? ?????? ?????????? ???, ??? ??????
??? ?????????? ?????? ?????????? ?????????, ?????????? ?????????? ? ?????????? ?? ?????? ???
????????? ??? ?? ?????????? ?????????? ?????????? ??? ?? ?????? ??? ?????? ?????????? ???
????? ??? ?????? ??? ?????????? ?????????? ?????????? ?????????? ?????????? ?????????? ???

???? ???? ??????? ?????????????????? ??????????????

56. ??? ?????? ??????? ???, ?? ?????? ??????????? ?????, ???' ??????, ??
?????????????? ?? ?? ????? 23 ??? ?????? 2008/9 ??? ????? ?? ?????? ?? ?????????????? ???
????????? ??????? ?????????? ???????, ??????? ?? ?? ?????? ? ?????????? ?? ?????? ??????
????????? ?? ?? ?????? ?????????? ????? ?? ?????? ?????????? ?? ?? ?????? ??????
????????? ?????? ?????? ?????? ?????? ???????????, ?? ?????????? ?? ?? ?????? ?????????? ?? ?? ?????? ??????
????????? ?????? ?????? ?????? ?????? ?????? ???????????, ?? ?????????? ?? ?? ?????? ??????
????????? ?????? ?????? ?????? ?????? ??????????? ?????? ?? ?????? ?????????? ??????
????????? ??? ?? ?????, ??????? ?? ?? ?????? 20 ??? ?????? ???????, ? ??? ?? ??
????????? ??? ?????? ??? . ??????? ?? ?? ?????? ??????????? ??????????? ?? ?? ?????? ??????
???? ?? ????? 23, ?????????? 1, ??? ?????? 2008/9, ??? ?? ??????????? ?? ?? ??????????
???? ?????? ?????????????? ?????????? ?????????? ?? ?? ?????? ?????????? ?????????? ??????????
???? ?????????????? ?? ?? ?????????? ??? ? ??????? ?? ?? ?????? ?????????? ?? ?? ?????????? ??????????
?? ?????????? ?? ?? ?????? ??? ?????????? ??? ?????? ?????????? ?? ?? ?????? . ?? ??????
???? ?????????? ??? ?????? 23, ?????????? 2, ??????? ??????, ??? ??????. ???????,
????????? ?? ?? ?????? ??? ?????????? ??? ?????? ?????????? ?????? ?? ?????? 23 ???
????????? 2008/9 ??? ?????? ???.

57. ??? ?????? 23, ?????????? 1, ??? ?????? 2008/9 ???????? ??? ????????,
????????????? ??? ???????? ??? ?????????? ??? ?????????? ??? ?????? ?????????? ??? ??? . ??????????,
????????? ?? ?? ?????? 23, ?????????? 2, ?????? ??????, ??? ?? ??? ????? ???????, ? ??????????????
???? ??? ?????? ??? ?? ??? ?????? ??? ?????? ??? ?? ??? ?????? ??? ?????? ?????? ?????? ??????
????????? ??? ?? ?????? ??? ?????? ?????? ?????? ?????????? ?????? ?????? ?????????????? ???
???? ??? ?????? ?????????????? ?? ????. ??????, ?? ?????? 23, ?????????? 2, ??????
??????, ??? ?????? ?????????? ??? ? ?????????? ??? ?????? ??? ?????? ??? ?????? ?????????????? ??
???? ?????? ?????? ?????? ?? ??? ?????? ?????????? ??? ?????? ?????? ?????????????? ? ????????
????????????? ?? ??? ?????? ?????????? ??? ?????? ??? ?????? ?????? ?????????????? ??? ?????? ??????
????????????? ?? ??? ?????? ?????????? ??? ?????? ??????????, ?? ?????????? ??? ? ?? ??? ?????? ??????
????????? ?? ??? ?????? ?????????? ??? ?????? ??? ?????? ?????????? ??? ?????? ??????????
??????????, ??? ?????? ??? ?????? ??? ??????????. ???, ???, ?? ?????? ?????? ??? ?????? ?????? ??????
?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ?????????? ??? ?????? ?????? ???

?????????? ?? ?????? ??? ??????????.

58. ????? ?? ?????? ???, ?? ?? ??? ??????????? ?????? ??? ?????? ???, ?? ?????????? ??? ?
?????????? ??? ?????? ?????? ?????????? ?????? ??? ??? ?????????? ?????? ??? ?????? ??? ?
????????? ??????, ??? ?? ?????????????? ?????? ??? ?????? ?????? ??? ?????? ???, ??? ?? ???
????? ?????? ?????? ??? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ??? ? ?????????? ???
????? ??? ?????? ?????? ?????????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ???, ?????? ?
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????????? ??? ?????? ??? ?????? ??? ?
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?
???.. ?????? ?? ?????? ??? ?????? ?????? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?
??????????, ?????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ?????? ??? ?
?????????? ??????. ?????? ??? ?????? ?????? ??? ?????? ?????? ?????? ???, ? ?????? ??? ?
?????????? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?
??? ??????????, ?? ??? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? 23, ?????????? 1 ???
????????? 2, ?????? ??????, ??? ?????? 2008/9.

59. ?????????? ?????????? ?????? ?????????? ???' ?????? ??? ?????? ??? ?????? ??? ??????????????
????? ??? ?????????? ?????????? ??? ?? ???? ?????????? ??? ?????? ??? ?????? ?????????????? ??
????? ?????? ??????. ????????, ?????????? ??? ?? ?????????? ????????????, ?? ?????? ???
????????? ? ?????????? ??? ?? ?????? ??? ?? ?????? ?????????? ??? ?????? ???
????????? ????, ??? ?? ?????? ??? ?? ?????? ?????? ??? ????????, ?? ?????? ??? ?????? ???
????? ?????????????? ?? ?????? ?????? ????, ?? ?????? ?????? ??? ?????? ??? ?????????? ???
????????? ????, ??????????, ?????????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ????, ?? ?? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ????. ??? ?????????? ???, ? ?????? ??? ?????? ??? ?????????? ??? ?????? ???
????????? ?????? ??? ? ?? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ??????????????,
????? ??????, ?? ?????? ??? ???????????. ??? ?? ?????? ??? ?????? ??? ?????????? ???
????? ?? ?????? ?????????????? ??? ?????? ?????? ??? ?????? ??? ?????????? ???
????????? ??? ??????????.

60. ????? ???. ?????? ?????? ??????? ???? ???. ?????????????? ?????? ???, ??? ???. ???????????
?????? ???. ?????????? ???. ??? ???. ?????? ???. ??? ???. ?????????? ?????????????? ???????????, ??
????? ?????????? ???. ?????????? ???. ?????? ?????????? ???. ??? ???. ?????? ???. ?????????? ?????????? ???.
????????? ???. ?????? ?????? ???. ?????? ?????? ???. ??? ???. ?????????? ???. ?????? ?????? ???. ???.
?????????, ?????? ???. ???. ?????????? ???. ?????? ?????? ?????? ?????????? ?????????? ???. ?????? ???.
????????? ?????????? ???. ?????? ?????? ???. ?????? ?????? ???. ??? ???. ?????? ?????? ???.
????????? ???. ?????? ?????? ???. ?????? 20 ???. ?????? 2008/9. ??? ???. ?????? ??????, ?
????????? ???. ?????????? ???. ?????? ?????? ???. ?????? ?????? ???. ?????? ?????? ???. ?????? ???.
????? ???. ???. ?????????? ???. ?????? ?????? ???. ?????? ?????? ???. ?????? ???. ???. ?????? ???.
????????? ???. ???. ?????? ???. ?????? ?????? ???. ?????????? ???. ???. ?????? ???. ???. ?????? ???.
???. ?????????? ???. ?????????? Sea
Chefs Cruise Services.

61. ????????, ???????, ??? ????? ?????????????? ??????? ?? ????? ? ?????????? ??? ??
????? 23 ??? ??????? 2008/9 ??? ????? ?? ?????? ??? ?? ?????????????? ??? ?????? ?????????? ???????
??????????, ??????? ?? ??? ?????? ? ?????????????? ??? ?????? ??????? ?????????? ??????? ??
?????????? ?????? ??? ????? ?????????????? ?? ??? ?????? ?????? ?????? ?????????????? ?????? ???????
??? ??????? ???????????, ?? ?????????? ??? ? ?????? ?????????????? ??? ?????? ??? ??
????????????? ??? ?????? ??? ?????????? ?????? ?????????? ?????????????? ??? ??? ???????,
????????? ??? ?????? 20 ??? ?????? ???????, ? ??? ?????? ?????????? ??? ?????? ???, ??? ???
?????????? ??? ??? ?????? ??????? ?????????????? ?????????????? ?????????????? ??????????

????? ??? ?????????? ??? ?????????? ??? ??????????????, ? ?????? ?????????? ??? ?????????????? ???
????? ???, ????, ?? ?????????? ??? ?? ?????????? ??? ??? ?????????? ??? ?????????? ??? ?????????? ???
??? ??????? ?????????? ??? ??????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ??? ??????? ???.
?? ??????? ?????????, ? ??????? ??? ?????????? ??? ?????????? ??? ?????????? ??? ?????? ?? ??????? ???
?? ??????? ??? ?????????? ??? ?????????? ???.

???????

62. ??????? ??? ??????? ??? ??????????????, ??????? ??? ?????????? ?? ??????????
?? ?????????? ?????? ??? ??????? ?? F?városi Törvényszék (?????????)
?????????, ???????) ?? ???:

1) ?? ?????? 20, ?????????? 2, ??? ?????? ??? ??????????, 2008/9/??, ??? 12??
????????? 2008, ??? ??? ?????? ?????? ?????????? ?????? ?????? ?? ??? ?????????? ???
????? ?????????? ????, ??? ?????????? ??? ?????? 2006/112/??, ?? ?????????? ???
????? ???? ?? ?????????? ??? ?????? ?????? ?????? ?????? ?????? ?????? ?????? ???
????? ????,

????? ??? ?????? ???

?? ?????? ?? ?????? ?????????? ?????????? ?? ?????? ??? ?????? ??? ?????? ?? ?????? ?? ??????
????? ???? ??? ?????? ?????????? ?????????? ??????, ?????? ?????????? ??? ?????? ???
????????? ??? ?????? ?????????? ??? ??? ? ?????? ??? ?????? ?????? ?????? ??? ?????????? ???
????? ?????????? ??? ?? ??? ?????? ??????.

2) ?? ?????? 170 ??? ?????? 2006/112/?? ??? ??????????, ??? 28?? ?????????? 2006,
?????? ?? ?? ?????? ?????? ?????? ?????? ?????????? ??????, ??? ?????????????? ?? ???
????? 2008/8/?? ??? ??????????, ??? 12?? ?????????? 2008, ?? ?????? 20, ?????????? 2,
??? ?????? 2008/9, ?????? ??? ?? ?????? ??? ?????? ?????????????? ??? ??? ??????????
???????????????

????? ??? ?????? ???

????????????? ??? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??? ?????????? ???
????????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???, ??? ?????? ???
????????? ??? ?????? ???, ?????? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ???
????????? ??? ??? ?????? ??? ?????? ??? ?????? ??? ??? ?? ?????? ?????? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ???
????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ?????? ???.

3) ?? ?????? 23 ??? ?????? 2008/9

????? ??? ?????? ???

?? ?????????? ??? ?????? ?????? ?????? ??????????, ?????? ?? ??? ?????? ? ??????????
?? ?????? ?????? ?????? ?????? ??? ?? ?????? ?????? ??? ?????? ?????????? ?? ???
????? ?????? ?????? ?????? ??? ?????? ??? ?????? ?????? ??????????, ?? ?????????? ??? ?
????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ??? ?????? ??????????
????????? ??? ??? ??????, ?????? ??? ?????? 20 ??? ?????? ??????, ? ??? ???
????????? ??? ?????? ???, ??? ??? ?????? ?????? ??? ??? ?????? ?????? ?????? ??????????
????????? ??? ?????? ?????? ??? ?????? ??? ?????? ??? ?????? ?????? ??? ?????? ???
????????? ???, ? ??? ?????? ?????? ??? ?????? ?????? ??? ???, ???, ?? ?????????? ???
?? ?????? ??? ??? ?????? ?????? ?????? ??? ??? ?????? ?????? ?????? ??? ?????? ???
????????? ??? ?????? ??? ?????? ??? ??? ?????? ??? ?????? ??? ?????? ???.

????????????? ?? ?????????????? ??????? ?? ?????????? ?? ?????????? ????? ?? ?????????? ????? ?? ??????????.

1 ?????? ?? ????????????: ? ?????????.

2 ??., ?????? ????, ????????, ??? 21?? ?????? 2012, Elsacom (C-294/11, EU:C:2012:382), ??? 2?? ????? 2019, Sea Chefs Cruise Services (C-133/18, ??? ????: ?????? Sea Chefs Cruise Services, EU:C:2019:354), ??? 17?? ?????????? 2020, Bundeszentralamt für Steuern (C-346/19, EU:C:2020:1050), ??? ??? 9?? ?????????? 2021, GE Auto Service Leasing (C?294/20, ??? ????: ?????? GE Auto Service Leasing, EU:C:2021:723).

3 ?? 2006, L 347, ?. 1.

4 ?? 2008, L 44, ?. 11.

5 ??????? ??? ???????????, ??? 12?? ??????????? 2008, ??? ??? ?????????? ???????????
?????? ??????? ?? ??? ?????????? ??? ????? ?????????????? ???, ??? ??????????? ???
?????? 2006/12/??, ?? ??????????? ??? ??? ?? ?????????????????? ??? ?????? ???
?????????? ??? ??????????????? ?? ??? ????? ?????? ??? (?? 2008, L 44, ?. 23).

6 Magyar Közlöny 2007/155 (XI. 16.).

7 *Magyar Közlöny* 2017/192.

8 *Magyar Közlöny* 2017/30.

9 ?? ??? ??????????????? ???, ? SES ?????? ??? ?????? ??? ??? ????? ??????? ???
?????????????? ??? ?????? ??? ?????????????? ?????????????? ??????. ????????, ????? ??
????? ?????? ??? ?????? ??????????? ??? ??? ?????? ??? ?????????? ??? ?????????????? ??? ??
????? ??????????. ?? ??? ?????????????, ??? ?????? ?????????? ??? ?????????? ??? ?????????? ??? ?????
??? ?????????? ??? ? SES ?????????? ?? ?????? ?????????? ??? ?????????? ??? ??????? ??? ??
????????? ??? ???.

10 ????????????????? ??? ??????????? ?????????????? ?? ?????????? ??? ? ?????? ??? ??
?????? ?????????????? ?????????? ??? ??? ????? ?????? ?????? ?? ?????????? ?? ???????
??? ??? ??????? ??? ?????? ??? ?????? 20, ?????????? 2, ??? ?????? 2008/9 ??? ??
?????? ??? ?????? 47 ??? ?????.

11 ??????? Sea Chefs Cruise Services (??????????).

12 ??????? Sea Chefs Cruise Services?(????????? 39 ??? 41 ??? 43 ??? 46).

13 ?????? Sea Chefs Cruise Services (????? 42).

14 ?????? Sea Chefs Cruise Services (????? 48).

15 ??., ?????? ??????, ??????? Sea Chefs Cruise Services

16 ??????? GE Auto Service Leasing (?????? 1 ??? ?????????????).

17 ?????? ??????? 79/1072/??? ??? ????????????, ??? 6?? ??????????

???????? – ?????? ??????????? ??? ????? ?????????????? ?????? ?????? ?????????????? ???
???? ?? ?????? ??? ????? ?????????????? ??? ?????????? ??? ????? (?? ????. ????. 09/001, ?. 111).

18 ? ?????????? ??? ?????????? ?????????? ?????????? ???. ??????? ??? 21?? ???????
2012, Elsacom (C-294/11, EU:C:2012:382, ??????????).

19 ?????? GE Auto Service Leasing (????? 54).

20 ??? ?????????? ?? ??? ?? ?????????? –???. ?????? Sea Chefs Cruise Services
(????? 44).

21 ??? ? ?????????? ?? ??? ?????? ?? ??? ?????? ?????????? ? ?????????? ??
????????? ?????? ??? ?????? ?? ??? ?????????? ??? ?????? ???, ?????? ?????? ?? ??? ??
????????? ?????????? ??? ?????????? ?????????? ??????.

22 ??. ?????? ?????? ??? 20?? ????? 2021, Dickmanns ??? EUIPO (C-63/20 P,
EU:C:2021:406, ?????? 58 ??? 60).

23 ??. ?????? Sea Chefs Cruise Services (?????? 34 ??? 36).

24 ??. ?????? ??? 17?? ?????????? 2020, Bundeszentralamt für Steuern (C-346/19,
EU:C:2020:1050, ?????? 47 ??? 48).

25 ??. ?????? GE Auto Service Leasing (????? 60).

26 ??. ?????? GE Auto Service Leasing (????? 59).

27 ???. ?????? Sea Chefs Cruise Services (??????????).

28 ???. ?????? GE Auto Service Leasing.

29 ???. ?????? ??? 2?? ?????? 2023, Nec Plus Ultra Cosmetics (C-664/21, EU:C:2023:142,
??????????).

30 ??? ???. ?????? ??? ?????? ??? ?????????? ??? ?????????? ??? ?????? 39 ??? ??????
??????????.

31 ???. ?????? GE Auto Service Leasing (????? 61).

32 ???. ?????? ??? 2?? ?????? 2023, Nec Plus Ultra Cosmetics (C-664/21, EU:C:2023:142,
????? 37).

33 ??. ?????? GE Auto Service Leasing (????? 59).

34 ???. ??? ?????????? ??? ?????????? ??? ?????? ?????? ??? ?????? 8 ??? 9 ???
????????? ???????.

35 ???. ??? ?????????? ??? 2 ??? ??????.

36 ??. ?????? GE Auto Service Leasing (????? 60).

37 ???. ?????? Sea Chefs Cruise Services (????? 39 ??? ??? ?????????????? ???????????).

38 ??? ????????????, ??? ?????? ??? ?????????? ??? ?????????? ??? ??? ??? ???????????
??????????.

39 ???. ?????????? ??? ??????????? ??? ?????? 38 ??? 39 ??? ???????? ??????????.

40 ????? ?????????? ??? ?????? 24 ??? ??????? ??????????.

41 ????? ?????????? ??? ?????? 26 ??? 30 ??? ??????? ??????????, ? ???????? ??? ?????
????????? ??? ?? ?????????????? ?????? GE Auto Service Leasing, ? ????? ?????????? ??
?????, ???????? ?????????? ?????????? ??? ?????? ??? ?????? ??? ??????.

42 ????. ?????? GE Auto Service Leasing (?????? 2 ??? ???????????).