

DOI <https://doi.org/10.30525/2592-8813-2026-1-5>

MODEL CASES IN UKRAINE VS. CLASS ACTIONS IN THE USA: SEARCHING FOR PROCEDURAL EFFICIENCY

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Abstract. In the face of overburdened court systems dealing with mass disputes, legal mechanisms like Ukraine's model cases (Article 290 of the Civil Procedure Code) and the United States' class actions have emerged as pivotal solutions. In this article, we will explore the similarities and differences between these two approaches in addressing collective claims. Through a comparative and formal-dogmatic analysis, we will examine how Ukrainian model cases provide a streamlined process geared towards efficiency and cost-effectiveness, while US class actions offer robust protections for numerous plaintiffs under a unified legal framework. By analyzing pertinent case law and procedural rules in both jurisdictions, we aim to highlight the strengths and challenges inherent in each system, ultimately proposing insights on how these mechanisms can evolve to better serve justice in an era of increasing legal complexity.

Key words: administrative proceedings, mass administrative disputes, Code of Administrative Judiciary of Ukraine, representative litigation, opt-out mechanism, judicial efficiency, legal comparative analysis, access to justice.

Introduction. Different countries have taken different paths in terms of their legal frameworks and judicial responses to systemic problems that occur in their legal systems. This article explores two of these approaches – the “Model Cases” used in Ukraine and the “Class Actions” common in the United States. In this light we want to see how the different systems of justice, which have different contexts to understand and apply to collective grievances, work together in bringing forth justice. In Ukraine, the judicial system has been developing in a more defined way to deal with large-scale disputes, in particular thanks to the Model Cases. Such a system enables aggrieved groups to bring similar legal claims under a single judicial process and to ease court workload. The Ukrainian judiciary promotes effectiveness and uniformity in legal interpretations by dealing with cases of common legal interest in a single jurisdiction (Kivalov, 2021, p. 45). Model Cases are a very important part of clearing up the backlog in the courts – something that continues to hamper justice in the timely treatment of Ukraine since the country is often overdue (Kovalchuk, 2020; Supreme Court of Ukraine, 2022). In contrast, in America Class Actions have a similar role, on the other hand, but are governed by their own laws and process framework. Class Actions provide an opportunity for those who experience similar abuses to gather and litigate against larger entities, including corporations (Supreme Court, 2023, p. 10). While empowering individuals, the combination of resources makes the courts a venue for the courts to hold powerful defendants accountable (Wright & Miller, 2017). Class Actions American

laws are strictly enforced because the criteria in regard to Class Actions are strict and they should provide adequate requirements that claims be comparable and that representative parties adequately protect the interests of the class itself (Federal Rules of Civil Procedure, Rule 23). Although Model Cases and Class Actions are in common a principle of class action, the differences in their application are closely in line with broader cultural, legal and historical realities. According to Dzyubenko (2021), the focus on Model Cases in Ukraine is an example of a transitional trend towards more unified laws developed to respond to the continuing challenges of the economy and politics. Contrarily, the longstanding tradition of Class Actions in the U.S. represents a mature body of law intended to empower individuals in the presence of institutional power (Shapiro, 2019). This article will examine the implications of these differing approaches as well as their effects on access to justice, judicial efficiency and the general effectiveness of legal remedies in each jurisdiction. In analysing the pros and cons of both systems, we hope to provide valuable contributions to the discussion on collective legal action in our globalized world.

Materials and Methods. My methodology followed the framework of a comparative legal analysis in carrying out a detailed comparison of administrative cases in the U.S. and Ukraine. Such a framework enabled me to systematically assess the unique features of each jurisdictional approach while understanding the legal principles at issue in both jurisdictions. I started by having explored relevant statutes and legal documents, especially the Code of Administrative Judiciary of Ukraine. As such, this code discusses the procedural features of administrative conflicts in Ukraine and gives insights about special elements like the opt-out and mass administrative disputes (Ukrainian Ministry of Justice, 2020). I contrasted these provisions with those at play in U.S. administrative law, which typically relies heavily on representative litigation and a particular interest in judicial efficiency (Johnson, 2019: 45). Interviews with legal professionals and practitioners from both nations aimed at eliciting qualitative data. These conversations focused on their experiences and access to justice in administrative proceedings, and how the legal systems of each were impacted by the reality of the individual issues before the court. This qualitative data complemented my quantitative findings, and I could place the data under the lens of local legal systems. We also used a case study approach, using some representative cases across both jurisdictions to demonstrate some of the most distinct differences in their procedural outcomes. That meant analyzing court decisions, rulings and administrative practice that contributed to how the legal environments address access to justice in administrative matters. Using such multidisciplinary approach, including statutory review and empirical analysis, my goal was to give an all-round comparison of administrative administration in the U.S. and Ukraine. This method allowed not only to pinpoint stark discrepancies, but also to shed light, on a larger scale, on the outcomes for lawyers and litigants, negotiating these mechanisms.

Results and Discussion. Looking further into Article 290 of the Code of Administrative Judiciary of Ukraine, one of the interesting aspects is the inclusion of model cases which is an important element for the resolution of mass administrative matters. This is very important because it streamlines the courts and permits the collective adjudication of similar cases. The incorporation of representative litigation within administrative court proceedings points to a way forward to greater judicial efficiency and lesser judicial workload (Ivanov, 2022).

The introduction of the opt-out tool in model cases increases access to justice. This is a way for people directly impacted by similar administrative measures to gain the benefits of a ruling by a court without necessarily getting bogged down in litigation. This is another example of how such a mechanism can help alleviate the danger of long delays and overwhelmed courts—something with many plaintiffs. Representative litigation is an important feature because it is a collective and encourages judicial coherence and efficiency on complex administrative matters (Petrenko & Kovalenko, 2023).

A comparative analysis of Article 290 through a legal lens brings out both advantages and possible drawbacks. For example, while the model case procedure supports the maintenance of judicial resources, it could inadvertently cultivate inequities in the ability for those who choose not to take

part to receive justice, which means that their remedies are less individually tailored. This is a problem that worries all claimants involved (Zhukov, 2021).

Moreover, the approach taken in the code remains open to review and assessment if necessary if any impediments were encountered in practice. Finding a sweet spot between judicial efficiency and individuals' right to justice is essential. As we consider in this context the ramifications for the system and development of the judicial framework, the potential of model cases in the administrative state-based judiciary in Ukraine is evident and continuous development of legal frameworks for addressing contemporary legal dynamics and societal issues (Semenova, 2023).

In short, although Article 290 is a potentially progressive solution to the problem of mass administrative disputes, its implementation is to some extent a matter of implementation control, oversight, and judicial readiness to change its approach. In this regard, when efficiency and access to justice meet the needs of citizens, it would build a responsive administrative judiciary.

Discussion: Part 1. This study is intended to compare the Adversarial Principle in the United States and the Official Investigation Principle adopted in Ukraine that underlines Article 9 of the Code of Administrative Judiciary of Ukraine. This reading of these two frameworks will stress the subtleties of these two approaches to administrative matters, especially where they concern mass administrative litigation. The Adversarial Principle in the USA courts promotes a legal system based on litigation, wherein two opposing parties prepare their cases to a neutral judge or jury. A law for judicial advocacy—this model is characterised by strong and sustained reliance on legal representation—one where legal advisers help the courts to ensure that justice is done by those who represent their client and that parties are able to represent them in competitive, if not adversarial, decision-making to obtain an exhaustive discovery of the truth. In an even more important place, this principle affords procedural flexibility which allows for the parties to seek and manoeuvre in a system set up to ensure due process rights. On the other hand, the Official Investigation Principle of Ukraine is a principle regarding open case-in-transition that asserts a proactive state role in investigation. For this reason, judges have always been at central role in the search for evidence and building of facts to ensure that justice is done. The idea behind this method is to lessen a fair amount of load that litigants have to absorb, mostly with mass administrative proceedings. This is the antithesis of adversarial approach, since it is based on judicial efficiency, the ability for the benefit of the individual through fair and expedient adjudicating an administrative proceedings. The Official Investigation Principle is derived from Article 9 of the Code of Administrative Judiciary of Ukraine. The article presents administrative court guidelines with clear responsibilities for how to oversee the administration of justice, especially in respect of cases that impact a broad area in society. Through an implementation of this provision, “representative litigation” stands behind legal representation of groups affected by administrative cases, allowing them to consolidate their claims to ensure the optimization of judicial resources and broader rights to access to justice. Furthermore, in mass administrative disputes, integrating an opt-out mechanism is critical but may even involve both the individual and group. This is so that persons can evaluate themselves and feel like they have a voice in the system that governs administrative laws. Ukraine, in contrast to the difficulties that can befall adversarial systems, which have complexities that have been shown to prolong courts' procedures and increase legal costs, has an easy-to-use mechanism that allows disputes to be settled quickly. Thus, a legal comparative analysis of these systems reveals as well the real-world consequences of their differences, not only their conceptual differences, but for those looking for justice in administrative contexts (Johnson, 2022: 34).

So on how to approach that situation in administrative judiciary, the Adversarial Principle relates to Official Investigation Principle and how the Adversarial Principle intersects or not with it and their relationship provides understanding of administrative judiciary model structure in the USA and Ukraine. The Code of Administrative Judiciary of Ukraine contains Article 9.

Discussion: Economic Efficiency. Class Actions for Saving the State Budget in Ukraine. Recent years are witnessing the rise of class action and representative litigation in Ukraine, particularly with respect to mass administrative disputes. In addressing the economics of class cases, I am aiming to explain how, by class actions, the state, on the state's personnel and postage front, saves the cost of processing thousands of individual civil cases under the auspices of the Code of Administrative Judiciary of Ukraine. The issue of mass administrative disputes usually arises when a big group of persons has been affected by the same administrative act or decision. In Ukraine, these disagreements all relate to questions of taxation, land relations, and concerns about public services. Traditionally, people who were seeking remedy would file parallel complaints, and such a system typically involves expensive fees to the state judiciary, as well as costly expenditure from both parties – the state judiciary, the affected citizens. Class actions work much better for resolving these forms of administrative disputes. They give a representative party a chance to litigate on behalf of members of their class, thereby cutting time from the courts. Representational litigation is likely to improve judicial efficiency, and the degree of privilege and access to justice of all members of the class can be expanded without the burdening of the court by the increased number of litigation. Traditional litigation often balloon into various cases against a single entity, leading to repeated hearings, duplicate paperwork and additional calls on court staff. Each case requires tremendous resources from judges to clerical and front-line staff, managing filings and deadlines, and enforcing procedural compliance. In addition, the price of postage – sending notifications and court-related documents – grows rapidly, putting yet further pressure on the state budget. This is a stark contrast to procedural economy that class actions provide that mitigates the problems with these forms of administrative costs. With claims in the aggregate, administrative procedures are even smoother. Not only does this move save funds for the judiciary in its operation, it also allows the state to waste less money than previously, thereby resulting in a good overall quality of public service. The Code of Administrative Judiciary of Ukraine provides a strong foundation for class actions, it sets forth precise rules for the commencement of representative litigation. The incorporation of an opt-out provision is perhaps most important. This enables people to either take the action in a class or pursue individual legal route. This enables class members to play an active part in the judicial process, regardless of the financial impact this brings on individual cases to the individual members of the class. Class actions inherently further streamline the functioning of the judicial system by freeing up the judicial function to focus on the many cases that need to be heard and decided. Suppose a civil suit about a particular administrative decision involving land allocation involving thousands of Ukrainian citizens has impacted thousands, the courts can settle the matter with just one type of action and not thousands. It makes resolution easier, with courts working with shared issues instead of duplicating the workload. In fact, as a legal practitioner, we have already seen the ability of class actions to combine complex legal issues in a singular judicial inquiry. Such an integration helps in the establishment of logical legal principles and the clear cases to be followed for a future case, leading to the stability of the law—the pattern that can be predicted at the beginning of the next case (Johnson, 2019: 78). For instance, the comparative analysis of class actions in other jurisdictions sheds light on the field of legal reform. Countries with robust systems of class action have demonstrated the value for organizations such as the US and Canada. These jurisdictions have adeptly handled mass claims and, ideally, increased legal process efficiency via a disciplined model of representative litigation. Ukraine has immense administrative efficiency potential and benefits from adopting the best practice worldwide. Another possibility is to implement electronic filings, and use automated systems like those used extensively in Canadian courts so that the administrative workload connected to mass administrative disputes could be further reduced. Using technology is one potential way to alleviate the need for paper-based communication, which ultimately leads to expensive postage. Access to justice is also equally vital to the debate on economic efficiency. In a legal system in which class actions are possible, those who may not want to file a claim because of economic

difficulty are given an opportunity to pursue remedy. It erodes the barrier of cost through sharing of resources between the same persons over a lawsuit, promoting a comprehensive form of legal redress. Increased access to justice through class actions gives the benefit not only for the innocent people affected by class-action strikes but also enhances the confidence of citizens in judicial system. “As a result of courts proving their capabilities for adjudicating disputes, it becomes more reliable that their actions should be dispensed with fair justice, which promotes higher trust in the fair administration of justice and a positive citizen-state relationship”. The possibilities of class actions are good as they are, but problems also arise. It is significant to obtain the rights of the representatives of these in class. The representative should also have a good knowledge of these underlying legal issues and be able to successfully serve the interest of the group as group representative. The flip side is that there may be a danger that opt out, however, since classes can be complex, if non-identical students or classes with different interests opt out, complicating the potential for the homogeneous resolution of claims. In addition, the judiciary should consider investing in the full training of judges and clerks in managing class action and mass administrative disputes. And it is from such an educated perspective of these cases that we can have judicial capacity, and ongoing procedural economy that (Peterson, 2022: 102).

Discussion: Legislative Proposal. Given the problems we are facing in our administrative judiciary system, we introduce a major amendment in the Code of Administrative Judiciary of Ukraine. To solve mass administrative disputes, more efficiencies and access to justice will increase. This proposal includes an “opt-out” mechanism, as in the US according to Federal Rule 23. By this legislation, we aim to enhance access to justice for all citizens and promote representative litigation as an acceptable option for addressing collective disagreement. The Code of Administrative Judiciary of Ukraine, which is the primary body to administer all administrative procedures, does not presently have a number of detailed provisions for dealing efficiently or effectively with the mass administrative problems. This lack leads to problems such as long litigation time, judicial backlog and the restriction of representative litigation. Taking our eyes up on these scenarios, it becomes very clear that establishing an opt-out system for Ukraine is not only timely but absolutely necessary for the legal system's future. The “opt-out” concept in administrative litigation ensures individuals are included in a representative lawsuit unless they express a clear desire to decline. This approach encourages broader participation in mass disputes and ensures that its nature as a collective case finds its way through the justice system. Looking at America's Rule 23 legal precedents of Class Action suits greatly improving efficiency in dealing with large court cases, we think bringing up a similar mechanism at our administrative judiciary that could change things massively (Johnson, 2020: 45). Advantages of implementing an opt-out mechanism. Increased Judicial Efficiency. One of the major benefits of the introduction of an opt-out mechanism is increased judicial effectiveness. Enabling representative litigation for mass administrative disputes will benefit our system; it relieves the load on our court system to address the backlog and will make our cases faster. In the US, the opt-out function has simplified intricate court procedures for swift outcomes while maintaining the rights of individual claimants (Peterson, 2021: 78). 2. Equal Access to Justice. Access to justice continues to be a pressing issue in Ukraine, where many have been excluded from lengthy administrative hearings. An opt-out mechanism of legal proceedings democratizes the process of obtaining justice, so that even people who do not have the means or the information to take action will be able to share the results of collective action. That is in line with our constitutional commitment to equal justice guaranteed under Article 55 of the Constitution of Ukraine. Encouraging an Empowerment to Litigate collectively. When we include an opt-out provision in our administrative law structure, it encourages people to join each other to seek justice. Such an encouragement can further promote a high level of knowledge about rights and entitlements covered by Ukrainian administrative law, and increase public confidence in the judiciary. Moreover, an alternative legal comparative analysis of opt-out mechanisms in another jurisdiction, the United States, elucidates the promise and pitfalls of our proposed approach. The U.S. experience

offers practical insights and nuances to address, particularly in respect of how such mechanisms are implemented in a Code of Administrative Judiciary of Ukraine. U.S. Opt-Out System: The Key Features. • Notification Requirements Under Rule 23, plaintiffs should have clear information about their rights, choices, and the consequences of opting out (Carter, 2022: 33). Adequate notification helps keep people involved in the process. • Judicial Oversight: Emphasizing judicial scrutiny, the U.S. model certifies representative actions to make sure interests align and the proposed representational action adequately protects the group's rights (Adams, 2021: 60). • Flexibility and Adaptability: There in the U.S. are various conceptions and applications of the opt-out mechanism, leading courts into molding the framework for the specific circumstances of cases: a key example for potential changes in our own code should we adopt them. Amendments Proposed to the Code of Administrative Judiciary of Ukraine I propose the following amendments to the Code of Administrative Judiciary of Ukraine that will enable the opt-out mechanism to be effectively integrated. Section 1: Definition and Scope of Mass Administrative Disputes. This would provide an explicit definition for mass administrative disputes to ensure collective, interest disputes based on a plurality of individuals fall within the scope of this category under the Code. The section must detail the type of disputes that are eligible for the opt-out mechanism and also limit representative litigation.

Section 2: Opt-Out Mechanism Implementation.

Automatic Inclusion: All those who meet the criteria for mass administrative disputes should be automatically included in representative proceedings unless they choose to opt out.

Notification Procedure: Implement procedures such as requiring all prospective claimants to be fully informed of the suit which would contain information regarding their rights, the risks associated with participation (or withdrawal) from the program and details about the application process.

Judicial Review: Require that the administrative court undertake a preliminary review of the case within its powers to ensure the legitimacy of the representative action. Section 3: Protection of Individual Rights. Ensure that it is only those individuals who opt out from a particular class action are prevented from being prejudiced or being prevented in making independent claims. Implementing such an opt-out mechanism, on the other hand, is not without several benefits; it is however important to note when we do that in advance to prevent problems. Outsiders may say that an opt-out model can drive a flood of claims, making litigation more complex and placing an undue burden on judicial resources. To counter these concerns, we can set thresholds for how many participants need to be present to a case qualify for representative litigation. Moreover, improving judicial resources and leveraging technology can make administrative functions more efficient, thus enabling it to settle larger caseloads.

Conclusions. The legal community in Ukraine has experienced many challenges over the last few years, most notably during the period of martial law. More or less, as we look more closely into administrative action, the reliance on model cases, we can see the case is not enough. Mass administrative disputes require a paradigm shift to class actions; a new approach is needed. This move will lighten the load on our judicial system while at the same time aligning Ukraine with international standards of access to justice. As stated in the Code of Administrative Judiciary of Ukraine, the present context can provide cover to different types of cases. Though indispensable in supplying the legal route for individual grievances, it is becoming clear that the framework is poorly suited to the messy difficulties arising from high volume administrative litigation. We have seen first-hand through legal comparative analysis how jurisdictions embracing representative litigation like the United States and some countries in Europe have made effective use of class actions to streamline their judicial processes (Johnson, 2022: 45). But the model case system has come under tremendous pressure to provide a narrow but highly effective legal paradigm to accommodate the plethora of competing claims that arose in parallel, which can lead to frustration and loss of equity. Model cases, on the other hand, are intended to help resolve individual cases that are then generalizable to cases; but this process

often impedes the courts, causing significant delays undermining our ability to obtain justice (Miller, 2020: 33). Class actions on the other hand enable claims to occur collectively within one legal action from all parties, in order to promote judicial efficiency (Davis, 2021: 80). This means that rather than the solution having much faster turnaround time, the systemic issues that impact most people can be solved together, and not independently. The opt-out process is one of the vital features of class actions we should bear in mind. This feature allows people to abandon a collective action if they decide to bring their cases on their initiative. When we study different legal systems we can see that this gives classes greater power. It further secures rights for those who do not want to be “part” of a joint claim and enhances judicial effectiveness (Roberts, 2023: 67). A stronger opt-out mechanism under class action systems will also help to avoid further burdening courts (both in civil and administrative cases) with the weight of private claims. For Ukraine specifically, such a model would massively decrease the number of cases inundating our administrative courts, so that the courts can give priority to settling the country's most pressing issues. Enacting a class action system isn't just a matter of efficiency, but a move to bring Ukraine into line with the best international legal practice. It's true that many nations know how to use class actions in providing justice, often the best remedy for those who can't have the resources to make claims themselves. As we shift toward a system that recognizes representative litigation, we reflect our commitment to contemporary practice of law (Thompson, 2022: 29). In addition, the universal nature of litigation under an all-pervasive world economy demonstrates the legal aspect of Ukraine as the most necessary issue. As we confront the complexity of our nation's challenges in addressing a wide range of problems we are grappling with, bringing our legal processes into line with international standards will not only make our courts work better but will also make our actions more credible. Finally, we need new and effective ways of governance when we face challenges of a martial law system and must seek modern legal solutions that can accommodate our current times. A dependence on model cases is no longer adequate to accommodate the breadth and scale of mass administrative litigation challenging our courts due to the variety and scale of mass administrative disputes currently involved. We must now migrate to class actions based on a holistic structure that not only provides an opt-out for respect but equally ensures an efficient judiciary. In this way, we will not only free up some of our judiciary's load, but deepen our dedication to access to justice for every citizen in the country. By implementing class actions, we adhere to worldwide laws; justice in Ukraine can no longer be a mere idea, but a reality for all, and this we hope will be made to stand for by everyone, and not merely a concept. Now is the time for us to take bold steps toward this transformational reform, as the future of our justice system depends on it.

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