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Dispute resolution for girik land: Recent laws and practices on evidentiary position

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Abstract
Certificate is proof of rights that applies as a strong evidentiary tool regarding physical data and juridical data contained therein, as long as the physical data and juridical data are in accordance with the data contained in the land rights book and the relevant certificate. measurement, according to Article 32 Paragraph 1 of the Land Registration PP. While girik is a certificate of land objects that shows legal control for tax purposes. Therefore, the certificate of ownership is more respected by law when there is a dispute between it and girik. The letter of girik turns out that under certain circumstances it can cancel the certificate of title to the land. to inflict damage and reverse the law against the parties. The purpose of this study is to see and analyze how the legal system in Indonesia treats land with girik status. In addition, it will be studied and analyzed how the Indonesian legal system handles proving land rights with girik status. Normative legal research, using a statutory approach, a contextual approach, and a case approach, is the method used in this study. The findings of this study show that girik land is a position originating from former customary land in Indonesia and is used as evidence in registering land rights to convert them into rights as stipulated in Article 16 of the UUPA. Girik is no longer used as proof of ownership of land rights after the UUPA comes into force. Girik land is not proof of ownership of land rights; Rather, it is evidence of one's control over the property. Conversely, the evidentiary power of a person's girik can be strong if it is supported by additional evidence of his ownership of land. People with girik status are encouraged to complete land registration in accordance with the guidelines of the land registration PP and PP No. 18 of 2021. This is done to ensure that land rights, such as property rights, product use rights, building use rights, or other rights regulated in Article 16 of the UUPA, are placed on girik land. To protect girik certificate holders who are used as documentation of land ownership and to provide legal certainty to them, it is also recommended that the government make strict regulations governing girik.

Keywords: Girik, land registration, title certificate

Introduction

A certificate is required to show ownership of land rights. Land title certificates serve as a reliable means of establishing who owns land rights. Legal certainty and title to land must be established before the issuance of title certificates. A certificate is "a letter of proof of rights as referred to in Article 19 paragraph (2) letter c of the UUPA, according to Article 1 number 20 of PP No. 24 of 1997 concerning Land Registration (hereinafter referred to as Land Registration PP). which states that land registration is the provision of proof of rights that apply as a strong means of proof, both land rights, management rights, waqf land, property rights over flats, and dependents that must be registered respectively".

Legal affirmation that the person named therein is the owner of the right is granted by the certificate of title to the land. Certificate holders are given legal protection from outside influences thanks to this legal certainty. However, until now not all land plots in Indonesia have been registered and given land rights certificates. Even in big cities, there are still certain places where landowners do not have the certificates required by the UUPA. In most cases, native rights still govern this land.

Old rights can come from customary lands with names such as girik, petok D, and ketitir or old rights with names such as eigendom, erfpacht, and opstaal derived from western land rights. In addition, the UUPA does not recognize land rights that have the status of girik. Land rights are defined in Indonesia as property rights, product use rights (HGU), building use rights (HGB), yield use rights, rental rights, land clearing rights, and the right to collect forest products, according to Article 16 Paragraph 1 of the UUPA. In addition, as stated in Article 53 of the UUPA, there are temporary rights, such as liens, profit-sharing company rights, dormitory rights, and agricultural land lease rights.

All land rights with names derived from customary or western land rights must change their status by the time the UUPA is passed to that outlined in the UUPA. But in reality, there are still many people who do not consider their land rights legal.

Girik land or land that is strengthened by a Land Certificate (SKT) from a village or kelurahan is not legally valid as proof of land ownership. Girik, which serves as a certificate of ownership of land goods for tax reasons, must be determined. In general, girik evidence received through inheritance or inheritance is required for land tenure. However, many are also obtained through the buying and selling process. Girik has no legal effect but can be used to pay the Land and Building Tax (PBB).

Girik is no longer considered as proof of land rights or ownership at the time of the enactment of the PP Law on Land Registration. Therefore, the certificate of ownership is more respected by law when there is a dispute between it and girik. This is in accordance with the provisions of Article 32 paragraph 1 of the Land Registration PP which states that a certificate is a letter of proof of rights that serves as a powerful proof tool regarding physical data and legal data contained therein, provided that the physical data

and legal data are in accordance with the information in the letter of measurement and the relevant land rights book. In fact, there are still many communities that have not registered their old land rights and have filed land disputes. This can be seen from a number of land rights conflicts involving uncertified land.

A land dispute is a dispute between two or more persons who have an interest in the legal status of one or more land objects and which may have legal consequences for the parties involved. In reality, the community is still unaware of many land-related cases. One example of a land claim that has not been subject to proof of protection and has become a land dispute due to a lawsuit filed in court is a land dispute between the Plaintiff/Appellate Respondent/Cassation Respondent named Sardjowiyono/Ponidin and Defendant I/Appellate /Kaasi Applicant named Mrs. Rukinem, Trihanggo Village Head as Defendant II and Head of Sleman Regency Land Office as Defendant II.

The Plaintiff filed a lawsuit at the Sleman District Court on the grounds that Defendant I took possession of the land and with the help of Defendant II and Defendant unlawfully crossed out girik No. 1067 and switched the sale and purchase to girik No. 577 without the Plaintiff's knowledge. It can be said that there was never a sale and purchase transaction because the Plaintiff claimed to have never done it with Defendant I. Following the incident, the plaintiff went to the Sleman District Court and filed a lawsuit.

Another illustration can be seen in Case No. 32/PDT. G/2013/PN. SRG, where the Girik letter can be used to revoke the title certificate over the land. The Girik letter became the basis for Ida Farida's property rights certificate which was revoked by the judge because it was considered to contain elements of a criminal act. Although it is clear that the certificate of land rights has a substantial evidentiary ability to land ownership based on Article 32 paragraph (1) of the PP on land registration, this is not the case.

This title needs to be raised for further study considering the context mentioned above. This study aims to investigate and analyze the status of girik land within the Indonesian legal framework. research and evaluate the validity of evidence of land rights with girik status

Research methods

"The type of legal research used in this thesis is normative legal research. Normative legal research, namely legal research conducted by examining library materials or secondary data. The legal research method in this study is normative juridical, so the approach method used is a *statutory approach (statute* approach) and a conceptual approach (*conceptual approach*)".

Yield and distribution

1. The position of land with girik status in the legal system in Indonesia

Indonesia had legal dualism in the field of land law before the enactment of the UUPA. On the one hand, Western Civil Law – often referred to as the Western territories – governed territories subject to and governed by Dutch colonial land law. These western land rights include eigendoms, opstalls, erfpacht, and other types of ownership. Meanwhile, customary law rules, which are unwritten in nature but still relevant and used in the community, concern land tenure by customary law communities or customary law communities. Hak ulayat, tanah ulayat, tanah bumi, tanah gogolan, and other names are used to describe it. There are two categories of land rights according to customary law:

1. Customary rights, which are collectively governed by indigenous peoples (law); and
2. Individual land rights.

Indonesia's Agrarian Law underwent significant changes when the UUPA was passed, especially in the land sector. Unification in Indonesian land law was achieved with the passing of the UUPA. Agrarian Law that prevailed during the colonial era, among others, included the "Agrarische Wet (Stb.1870 Number 55), Agrarische Besluit, and the Civil Code, especially Book II on Materials governing matters of land rights, repeated along with the introduction of the UUPA. Lands originating from western rights and customary rights are cancelled once the UUPA is ratified, becoming land rights as described in article 16 of the UUPA".

The term "girik" is not recognized by the UUPA as one of the rights to land. But there is evidence of customary law in the UUPA. The land rights regulated by UUPA are:

1. "property rights;
2. business use rights;
3. building use rights;
4. right of use;
5. leasehold;
6. the right to open land;
7. the right to collect forest products and;
8. other unspecified rights".

Girik, according to the land registration PP, is a proof of ownership in the name of the right holder before the Law was enacted, according to Djamik Asmur. The Petuk Land Tax, also known as Landrente, Girik, Pipil, Ketitir, and Vervonding, is one source of textual evidence. Previous rights originating from western and customary lands must be converted in accordance with UUPA land rights. Land rights conversion refers to adjustments made to land rights previously regulated by the previous legal framework, namely land rights according to the Western Civil Code and land regulated by customary law, in order to be incorporated into the new land law framework. rights stipulated in the UUPA. However, the certification of land use change due to customary rights is not specifically regulated by the UUPA. However, the UUPA recognizes the existence of customary land among communities that practice customary law.

This can be seen from the provisions of Article 3 of the UUPA which states that "the unity of customary law communities, as long as the reality exists, must be such based on the interests of the nation and state, based on national unity. and shall not engage with other higher laws and regulations", having regard to the provisions of Articles 1 and 2 on the exercise of customary and similar rights. Based on Article 3 of the UUPA it is clear that the UUPA recognizes the existence of customary land that applies to customary law communities and remains valid as long as it remains in reality.

In addition, it is clarified in the explanation of Article 3 of the UUPA that what is meant by "customary rights and similar rights" is what is called "beschikkingsrecht" in customary law libraries. The general provisions of the UUPA are stated in Article II paragraph (3) that this

provision originally originated from the recognition of the new agrarian law regarding the existence of customary rights. As is known, customary rights have never been formally recognized in law, even though they exist, are valid, and are taken into account by judges in decision making. As a result, in the colonial era, customary rights were often ignored in the application of agrarian regulations. The customary right will essentially be taken into account as long as it is recognized by the legal community concerned, because its reference in the UUPA effectively translates into its recognition. For example, when granting land rights (such as the right to use produce), the legal community concerned will first be tried and will be given "recognition" about who actually has the right to collect proceeds as the owner of customary rights.

Registration is required for old rights, including those derived from western rights and those derived from custom. This is done to ensure that the land is protected by land rights as stated in Article 16 of the UUPA. Antiquities must be documented in order to be registered with the land office. This is in accordance with Article 24 Paragraph 1 of the Land Registration PP which states that "for the purposes of registering land rights originating from the transfer of old rights, evidence of such rights is in the form of written evidence, statements and/or statements of relevant witnesses whose degree of truth is considered by the Adjudication Committee in systematic land registration or by the Head of the Land Office in sporadic land registration, considered sufficient".

Furthermore, in the explanation of Article 24 of the Land Registration PP, it is stated that the evidence intended can be:

1. "Grosse deed *of eigendom rights issued under* the Overschrijvings Ordonatie *(S.1834-27), which has been affixed with defects, that the eigendom* rights in question are converted into property rights; or
2. Grosse deed of *eigendom* rights issued under the *Overschrijvings Ordonatie* (S.1834-27) from the entry into force of the Law until the date the land registration is carried out according to Government Regulation No. 10 of 1961 in the area concerned; or
3. Proof of title issued under the relevant Swapraja Regulation; or
4. Certificate of property rights issued based on Agrarian Minister Regulation Number 9 of 1959; or
5. Certificate of title from the competent Officer, either before or since the enactment of the Law, which is not accompanied by the obligation to register the rights granted, but has fulfilled all obligations referred to therein; or
6. Deed of transfer of rights made under a hand affixed with a testimony mark by the Traditional Head/Village Head/Village made before the enactment of this Government Regulation; or
7. Deed of transfer of land rights made by PPAT, whose land has not been recorded; or
8. Waqf pledge deed / waqf pledge letter made before or since the implementation of Government Regulation Number 28 of 1977; or
9. Minutes of auction drawn up by the competent Auction Officer, whose land has not yet been booked; or
10. Letter of appointment or purchase of land parcels in lieu of land taken by the Government or Local Government; or
11. Land Tax, girik, pipil, kekitir and Verponding Indonesia before the enactment of Government Regulation Number 10 of 1961; or
12. Certificate of land history that has been made by the Land and Building Tax Service Office; or
13. Other forms of written evidence under any name as referred to in Articles II, VI and VII of the Conversion Provisions of the UUPA".

Based on the provisions in the explanation of Article 24 of the Land Registration PP, Suyanto classified evidence against former customary land, including:

1. "Landrente, girik, pipil, kekitir, verponding Indonesia, or written evidence under any name as mentioned in Articles II, VI, and VII of the Conversion Provisions of Law Number 5 of 1960 concerning Basic Agrarian Regulations ("UUPA");
2. Deed of transfer of rights under hand accompanied by a certificate from the traditional head, lurah, village head, or other party named and made before the effective date of the Land Registration PP;
3. Certificate of property rights provided in accordance with applicable laws and regulations;
4. A decree on the transfer of property rights issued by an authorized official, either before or after the entry into force of the Law, which has fulfilled all its requirements, but does not include the requirements for registering the rights granted; or
5. Certificate of land history issued by the land and building tax service office along with the legal basis for the transfer of rights".

Based on the explanation above, it should be understood that girik is a former customary land. Before the enactment of the UUPA according to Ria Fitri, Girik was a proof of ownership legally existed. Girik was once considered as a sign of proof of ownership of land rights, but after the Law came into force, the land law only recognized girik as a levy on agricultural products and a written statement that a piece of land was once considered customary land. Girik is not a property right over land as contained in Article 16 of the UUPA such as property rights, building use rights and business use rights and other rights.

If associated with the theory of legal certainty, then legal certainty is defined by Jan Michiel Otto as the availability of regulations that are easily obtained, issued, and recognized because (state power). Basically, there are no definite guidelines about the status of this girik, including whether the girik is proof of ownership of land rights or not. We can only conclude that this girik is an old right derived from past customary land if we examine the provisions of the UUPA, Land Registration Regulation, and PP No. 18 of 2021. Therefore the status of this historical land right must be regulated to established standards.

If the new girik owner registers in accordance with the rules outlined in the Land Registration Regulation and PP No. 18 of 2021, the right to the new girik land can be carried out. Land registration does not result in a violation of time in connection with old rights originating from former customary land, but after the issuance of PP No. 18 of 2021, old rights derived from customary land are only valid for a period of five years starting from the time this PP comes into effect.

This is in accordance with Article 96 of PP No. 18 of 2021, which states that "written evidence of customary land already owned by people must have been completed within a maximum of 5 (five) years from the date of entry into force of this government regulation. So that Girik and similar records of former customary land can no longer be used as written evidence of customary land in land disputes in court but only used as guidelines in the land registration process, within 5 (five) years after this PP comes into force".

2. Dispute Resolution related to the Evidentiary Power of Land Rights with Girik Status

"The certificate is proof of legal ownership of land rights in the UUPA. The issuance of certificates serves as a strong evidentiary tool and guarantees legal certainty of land rights. A certificate is strong evidence of ownership in the sense that the physical and legal information contained therein must be considered accurate and included in the land book and the relevant letter of measurement as long as it cannot be proven otherwise. That is, if there is no evidence to the contrary, the judge must accept the statements made therein as actual facts and give their legal weight. Therefore, the lawsuit will determine whether the evidence is reliable, and the court decision will be revised and corrected if it turns out that the description of the land register is wrong.

Someone who owns land, must have proof of ownership of rights to the land. Both in the form of land rights certificates and other evidence for land that has not been certified. Based on the explanation of Article 24 paragraph (1) letter k of the Land Registration PP, evidence of uncertified land related to registration of rights can be in the form of several things, namely evidence of Land Tax / landrente, girik, pipil, kekitir and Verponding Indonesia before the enactment of Government Regulation Number 10 of 1961.

By law, the state recognizes communal ownership of uncertified land, often known as "customary rights", that have not been certified. Customary rights are tenure rights according to customary law owned by communities according to customary law over certain areas that are the environment of their members. These rights allow communities to utilize local natural resources, including land, to support their livelihoods. The communities and resources concerned have hereditary and continuous relationships with their territories according to customary law.

Customary rights are recognized as long as they are still controlled and there is additional evidence that the person was the owner of the land before the certificate was issued. Girik evidence is only used as one of the registration requirements in the land registration process as proof of ownership. Article 97 of PP Number 18 of 2021 concerning Management Rights, Land Rights, Flats, and Land Registration reinforces this by stating that land certificates, compensation certificates, village certificates, and others of the same kind are designed as Only in the context of land registration. Hopefully the information on land tenure and ownership issued by the Village Head / Sub-District can be used as a reference. The certificate of registration of land rights still requires the completion of additional types of documentation.

Girik can be considered as proof of land ownership even though it is not legally recognized as such by law; however, it must be accompanied by a written statement from the Lurah or Village Head authorized by the sub-district head and an announcement to the wider communit. For the purposes of registering land rights originating from previous transfers of rights, written letters are required, including photocopies of Girik, according to Article 24 Paragraph (1) of the Land Registration Regulation. One of the requirements for the conversion of customary land is girik. Girik can be viewed as a written document of customary property rights and is one of the conditions for the conversion of customary land.

Based on this article, it turns out that the strongest proof of ownership is not a girik or other proof of ownership owned by a person to show ownership of an item. Because the land title certificate is essentially the only document that can establish legal ownership of a piece of land in the eyes of the state. As already mentioned, one of the proofs of tax payment is girik, although the information entered in it is rather scant. This letter does not have concrete and legally binding evidence that the certificate has. Which of course does not provide guarantees and legal protection to the owner of the girik letter. Therefore, you must secure the land office where the object is located to obtain a certificate to obtain legal certainty regarding land certificates or girik letters.

Because it is rarely mentioned in literature or laws and regulations related to land, there are still many people who do not understand what is meant by Land Certificate, letter C, or Girik book. Land certificates/letter C/Girik books are mainly used as a basis for recording tax collection and land information.

If an official land certificate has not been issued, then the letter that serves as proof of ownership rights is called girik land. Although some people acquire ownership of land by girik through the process of buying and selling, most do so through inheritance. Girik can be considered as one of the proofs in customary rights, as well as the payment of land and building tax, where the existence of this girik indicates that the person is obedient as a taxpayer, even though there is no rule that expressly states that girik is a taxpayer. a customary right. Girik is not recognized by the UUPA as a means of establishing ownership of land rights, although it can be used to pay land and building taxes but has not yet obtained full legal authority.

The status of Girik is an additional historical document relating to property rights. Azhar added that the girik letter is one of the proofs of old rights, which serves as proof of one's physical control over a piece of land but not as evidence of the person's control of land rights. Even if a family has owned a property for generations, there is no ownership of land rights if the owner can prove it with a certificate. Girik is used as one of the requirements or initial evidence of registration of land rights so that landowners can obtain certificates as strong evidence of ownership of an item. According to Indonesian land law, girik only serves as proof of ownership, not proof of ownership of land. land rights.

Despite the fact that girik does not have the same weight in Indonesian land law as land title certificates, judges still manage to obtain land through the use of girik in some court cases. In fact, there is still a lot of land in Indonesia that has not been certified. If in addition to the certificate, other evidence is still needed to show someone's ownership of a particular item. In rare circumstances, a girik proof may be even more convincing than a title certificate, which is the

best proof of ownership. Similar to decision number 54/Pdt.G/2014/PN. Sleman and 32/Pdt.G/2013/PN.Srg, this case allows the cancellation of proof of ownership based on the certificate by another certificate. In this case, the question arises how strong the evidence of this girik letter is. Judges are severely limited by evidence when making decisions in cases under the evidentiary framework of Indonesian procedural law. Judges in Indonesia use the principle of purely objective evidence to decide cases, according to analyses that use evidentiary theory. According to this theory, the judge must declare that an act against which he is charged proves to be in love with the things that were killed from the many instruments of contention that occurred, which were strongly bound. with evidence and evidentiary bases established by law. Only by law. In deciding a case, the court will look for additional evidence that supports the right to grant land certificates in accordance with the rules on evidence stipulated in the procedural law. As long as and as long as there is no alternative means of proof that shows the truth to the contrary, the judge adjudicating the case must consider all information included in proving these rights as factual evidence.

Based on two examples of existing cases, the judge in his ruling canceled the certificate of property rights whose strength was stronger than girik. In this case although the original owner of the disputed land has not been certificated, he can prove his control over the land through girik and other evidence and historical control over the land. Based on the facts revealed in the trial, the girik owner can prove that his ownership of the land was acquired in good faith and that the land has also been under his hereditary control.

In addition, Indonesia's land publication system adheres to a negative publication system with a positive tendency. This shows that the owner of the certificate to control a piece of land registered in his name is protected by the state, but it does not rule out the possibility of a lawsuit in the future. The land remains owned by the certificate holder, unless another party can show otherwise. The opportunity to litigate and prove that the land does not belong to the person named in the certificate is given to any party who later feels aggrieved by the issuer of the certificate.

According to Supreme Court precedent, records from village books or girik cannot be used as proof of ownership in an agreement if they are not supported by additional evidence, as mentioned in the Supreme Court. Reg. No. 84K/Sip/1973, dated June 25, 1973. Witness statements, confessions, presumptions, and oaths are examples of further proof. The Civil Code further stipulates in Article 1888 that the original deed is the strongest written evidence. If the original deed still exists, the conclusion and quotation can only be relied upon today because it corresponds to the original, which can always be proven correct. The judge may consider girik evidence as long as the parties to the dispute can produce the original letter in the case. In addition, according to Article 1881 of the Civil Code paragraph 2, judges have the option to consider evidence based on the strength of papers submitted in court as long as it is necessary to be able to explain the matter at a moment's notice. hand.

Based on this, it is possible that the judge will rule that the plaintiff's evidence and additional supporting evidence in the two examples of cases above allow the cancellation of certificate-based proof of land ownership, which is legally stronger than striated evidence.

It should be understood that the power of a certificate is not the same as the power of a certificate. However, the evidentiary power of girik can be as strong or even stronger than a certificate if there is sufficient supporting evidence. Therefore, even though according to Indonesian land law a certificate is proof of a recognized right and has considerable evidentiary value, it can be revoked with girik evidence, even though girik is only as proof of land tenure, not proof of ownership of property rights.

Recognition of ownership of an object, both fixed and movable, has become an important thing lately. Not infrequently the recognition of an object also causes disputes that lead to court. One of the ownership disputes that often occurs is the dispute over ownership of land rights. In disputes over land rights it is usually accompanied by recognition from each party of ownership of a land accompanied by evidence brought by each party." Land rights with girik status can be done in several ways, including:

1. Through mediation or negotiation between the disputing parties, namely girik rights holders and parties who feel aggrieved or have claims to the land. Mediation or negotiation is carried out with the aim of finding a way out that is acceptable to both parties.
2. Through legal remedies in court. Parties who feel aggrieved or have claims to land can file a lawsuit in court to obtain legal certainty. In this case, the party filing the lawsuit is responsible for proving its claim, so that the girik rights holder has the advantage of not needing to prove conventional land ownership.
3. Through the process of converting girik land rights into freehold land rights. Girik rights holders can apply for conversion of girik land rights to freehold land rights at the local Land Office.

Conclusion

Based on the provisions of the land registration PP and PP No. 18 of 2021, the position of land with girik status in the legal system in Indonesia is the old rights derived from former customary land which is used as evidence for the purposes of registering land rights to be converted into rights contained in Article 16 of the UUPA. After the enactment of the UUPA, girik is no longer used as proof of ownership of land rights.

Tanah girik is only proof of one's control over land, not proof of ownership of land rights. However, the power of a person's proof of land with this girik evidence can be strong if it is supported by other evidence that supports his control over the land.

References

1. Adrian Sutedi. Land Rights Certificate, Fourth Printing, Jakarta: Sinar Grafika, 2017.
2. Akur Nurasa and Dian Aries Mujiburohman, Land Registration Data Maintenance, Yogyakarta: STPN Press, 2020.
3. Ali Achmad Chomsah, Land Law Series Land Law I - Granting State Land Rights and Land Law Series II - Certificates and Problems, Jakarta: Prestasi Pustaka, 2002.
4. Andi Hamzah. Introduction to Criminal Procedure Law in Indonesia, Jakarta: Chalia Indonesia, 1984.

5. Andi Sofyan, Criminal Procedure Law, Makassar: Kencana, 2014.
6. Badriyah Harun. Land and Building Dispute Solutions, Yogyakarta: Pustaka Yustisia, 2013.
7. Edward Omar Sharif Hiariej, Theory and Law of Evidence, Jakarta: Erlangga, 2012.
8. Effendi Perangin, Land Rights Certificate Management Practice, Jakarta: Rajawali Pers, 1992.
9. Frans Hendra Winarta, Indonesian and International National Arbitration Dispute Resolution Law, Jakarta: Sinar Grafika, 2012.
10. Hadimulyo. Considering ADR, Study of Alternative Dispute Resolution Outside the Court, Jakarta: ELSAM, 1997.
11. Soetomo. Exemption for Revocation of Land Rights Application, Surabaya: National Business, 1984.
12. Sophar Maru Hutagalung, Civil Court Practice and Alternative Dispute Resolution, Jakarta: Sinar Grafika, 2012.
13. Annisa Oktaviani and Harjono, "The Evidentiary Power of Surat Girik in the Examination of Land Disputes in Court (Case Study of Supreme Court Decision Case Number 816 K / PDT / 2016)", Verstek Journal, Vol. 7 No. 1, 2019.
14. Arifin Bur and Desi Apriani "Certificate as a Strong Evidentiary Tool in Relation to the Land Registration Publication System", UIR Law Reivew, Vol. 1 No.2, 2017.
15. Desy Nurkristia. "The Principle of Legal Certainty in the Girik Position of Land Rights Certificates", Suara Hukum Journal, 2021, 3(2).
16. Desy Nurkristia. "The Principle of Legal Certainty in the Position of Girik Against Land Rights Certificates", Thesis, Surabaya: Faculty of Law, Wijaya Kusuma University Surabaya, 2021.
17. Didik Yudha Aribusono, "The Legal Position of Written Evidence Other Than Certificates of Ownership Rights over Land Objects", Thesis, Surabaya: Master of Law, Faculty of Law, Universitas Airlangga, 2016.
18. Civil Code (Civil Code).
19. Law Number 5 of 1960 concerning Basic Regulations on Agrarian Principles.
20. Government Regulation Number 24 of 1997 concerning Land Registration.
21. Government Regulation Number 18 of 2021 concerning Management Rights, Land Rights, Flats and Land Registration;
22. Regulation of the Minister of Agrarian Affairs and Spatial Planning/Head of the National Land Agency Number 16 of 2021 concerning the Third Amendment to the Regulation of the Minister of Agrarian State/Head of the National Land Agency Number 3 of 1997 concerning Provisions for the Implementation of Government Regulation Number 24 of 1997 concerning Land Registration.
23. Regulation of the Minister of Agrarian and Spatial Planning/Head of the National Land Agency
24. Number 16 of 2021 concerning the Third Amendment to the Regulation of the Minister of Agrarian State/Head of the National Land Agency Number 3 of 1997 concerning Provisions for the Implementation of Government Regulation Number 24 of 1997 concerning Land Registration.