



---

## Legal certainty over the executed object of a final and binding judicial decision (A Research in Banda Aceh City)

Yunni Efrina Caniago<sup>1</sup>, Teuku Muttaqin Mansur<sup>2</sup>, Iman Jauhari<sup>3</sup>

<sup>1</sup> Student, Faculty of Law, Universitas Syiah Kuala, Banda Aceh, Indonesia

<sup>2</sup> Lecturer, Faculty of Law, Universitas Syiah Kuala, Banda Aceh, Indonesia

---

### Abstract

In general, a lawsuit that has been decided by the court and has permanent legal effect is regarded as concluded. This is because the court's decision has become a law that must be obeyed by the parties, and if another lawsuit is filed against the same object in the future, the judge must rule that the case contains elements of *ne bis in idem*. Because, in theory, cases with the same subject and object as the preceding case should not be decided twice. However, in the vicinity of Banda Aceh City, three similar cases against the defendant that had been decided and executed by the court were discovered. Therefore, the question arises as to why a legally binding and executed decision can be challenged again and what is the reason for the emergence of new lawsuits on executed objects and decisions with permanent legal effect. This study's objective is to explain the cause of the community's decision to file a new lawsuit against the object of a previously-executed lawsuit, as well as the implementation of the principle of legal certainty with respect to the executed lawsuit's subject by conducting a comprehensive investigation at the research site through direct observation and interviews, as well as a conceptual approach. It is hoped that law enforcement officers will decide each case in accordance with applicable laws and regulations, without taking sides. If the decision has legal force, the parties are obligated to comply with its implementation. Before a case involving land title certificates is registered with the court for processing, advocates and legal advisors are advised to conduct a thorough investigation. Although the judge has authority under the *Ius Curiae Novit* principle, this does not mean that he must know the law. Rather, he must be extremely observant and thorough when deciding a case brought before him.

**Keywords:** court decision, legal effort, execution, land rights certificate

---

### Introduction

Problems encountered by a person may or may not include conflict. In order to address these issues, civil procedural law gives the following two guidelines:

*Contentiosa* cases (lawsuits), i.e., proceedings involving a conflict between two or more parties, are frequently referred to as a lawsuit. The litigation must be settled and decided by the court, and the outcome, whether it be win, loss, or settlement, depends on the legal procedure. Examples of this model include property and inheritance disputes.

Voluntary cases, i.e., situations in which there is no controversy and which are solely for the applicant's benefit, are unilateral (*ex-parte*). This case is also referred to as an application. For instance, an application for determining the respective portions of an inheritance, adoption of children, name changes, guardianship concerns, and corrections to civil registration deeds.

This study focuses exclusively on *contentiosa* cases, sometimes known as civil litigation. In general, there are only two types of civil cases in court: namely lawsuits on Acts against the law and lawsuits for breach of contract.

Acts against the law in Article 1365 of the Civil Code have a restricted connotation under the impact of legism's doctrines. Adopted is the notion that a criminal act is one that violates the legal rights and responsibilities established by law. In other words, a violation of the law (*onrechtmatigedaad*) corresponds to a violation of the Authority or Act (*onwetmatigedaad*). The term "unlawful acts" is a translation of the Dutch term *onrechtmatigedaad*, which is governed by Civil Code Book III, Articles 1365 to 1330, concerning Engagement. Some academics prefer the term "violating," while others prefer "against." Wirjono Prodjodikoro defines "violation of the law" as follows: "The term *onrechtmatigedaad* in Dutch typically has a narrow meaning, namely the meaning used in Article 1365 *Burgerlijk Wetboek* and which only relates to the interpretation of the article, currently the term unlawful act addressed to laws that generally apply in Indonesia and the majority of which are customary law."

On the basis of the preceding formulation, it can be stated that an unlawful act is an act that violates the subjective rights of others or acts (omissions) that are contrary to obligations under the law or contrary to what, according to unwritten law, a person should carry out in his association with fellow citizens.

In civil law enforcement, the judiciary is the final hope for anyone seeking justice. When the parties to a dispute are unable to resolve it themselves, they may bring a case in court based on a lawsuit for an illegal act or a lawsuit for default. According to Article 50 of Law No. 8 of 2004 jo. Law No. 49 of 2009 on the Second Amendment to Law No. 2 of 1986 on General Courts, district courts have the responsibility and jurisdiction to analyze, decide, and settle criminal and civil cases at the initial level.

A decision is the final outcome of a lawsuit. According to Sudikno Mertokusumo, a judge's ruling is a declaration made during a trial by a state official with the authority to do so, with the intent of ending or resolving a case or dispute between parties. It is not only what is uttered that is referred to as a decision, but also a written statement that is then read by the judge at trial. Before a judge pronounces a judgement in court, a written draft ruling will not have legal force. Typically, a judge's final ruling in a disagreement includes sanctions in the form of punishments for the losing party in a court proceeding. Both the Civil Procedure Code and the Criminal Procedure Code provide punitive punishments that can be used indiscriminately to rights violators. In the Civil Procedure Code, however, punishments consist of completing tasks and/or compensating parties who have been damaged or defeated in court proceedings. In contrast, the Criminal Procedure Code prescribes imprisonment and/or a fine.

Execution is the consequence of a judgment with permanent legal effect (*Incracht*). Execution is derived from the word "*executie*," which implies carrying out a judge's order (*uitvoer legig van vonnissen*). Execution refers to the application of legal force to court orders in order to carry out court orders that have permanent legal effect. The execution of a civil decision is enforcing a decision in a civil case in compliance with the applicable laws and regulations because the party being executed is unwilling to comply voluntarily. In general, execution is the fulfillment of the obligations of the losing party outlined in the judge's judgment, i.e., the accomplishments specified in the judge's decision. In other words, the final step in civil and criminal court proceedings is the implementation of a legally binding judge's ruling.

Execution is governed by Article 195 HIR and Article 206 Rbg, which establish, in a nutshell, that execution is the carrying out of a court decision on an order from the Head of the District Court, who investigates the matter initially. Several factors become the principles of execution in order to carry out the execution, namely:

Execution is carried out against judgments with permanent legal force; execution is carried out against decisions that do not wish to be carried out voluntarily. In general, execution is a forced act carried out by the court; if the losing party wishes to carry out the Court's decision himself, the act of execution must be removed.

Decisions of a *Comdemnatoir* character can be implemented. This indicates that the ruling contains a punitive dictum.

The following are some of the methods for carrying out executions that can be followed:

Execution on orders and/or under the direction of the Head of the District Court; The execution was carried out on the instructions of the Head of the District Court, who examined the matter at the initial level. If the execution falls fully or partially outside the court's jurisdiction, the Chief Justice of the Court requests help from the head of the court with jurisdiction over the decision's execution. If there is opposition to the implementation of the decision from a third party, it will be returned to the Court's presiding judge.

Prior to execution, warnings are issued (*Aanmaning*); if the losing party is unwilling or careless in carrying out a decision of its own will, the prevailing party may submit a request to the Head of the District Court to carry out the decision. Then, the Chairperson of the Court will summon the losing party to comply with the decision within a timeframe of no more than eight days, as set by the Chairperson.

Failure to observe the Warning will result in confiscation; If the judgment is not executed within the allotted period, or if the defendant does not appear after being properly summoned, the head of the District Court, due to his position, issues a written order to seize a variety of movable and immovable assets from the losing party. Thus, the confiscation revenues are adequate to replace the amount of money specified in the judgment.

Permanently binding decisions are those that, under the requirements of the law, can no longer be disputed using conventional legal remedies. On the other hand, decisions that do not have permanent legal force are those that, pursuant to the rules of the law, can still be contested through the use of regular legal remedies such as *verzet*, appeal, and cassation. In principle, execution may be carried out if the losing party does not voluntarily carry out or comply with the terms of the judgment. However, if the losing party is willing to comply and complete the decision willingly, the act of execution must be removed, and a distinction must be drawn between voluntarily executing the decision and executing the decision via execution. There are a number of fundamental Execution rules, including Articles 195-224 HIR and also Articles 206-258 RGB, yet a number of Articles have been found unenforceable (Articles 209-223 HIR). Articles 195-208 HIR, Articles 206-240 RBG, Article 225 HIR, and Article 259 RBG provide additional legal justifications for the execution of decisions.

On the basis of the preceding discussion, it is understood that if a decision has permanent legal effect, and especially if it has been executed, the case or dispute is regarded to be resolved. As a result, the defeated party can no longer initiate legal action because the decision has been made and is now a binding law that all parties must obey. Consequently, if a subsequent lawsuit is brought against the same object, the case will already contain a *ne bis in idem* element, as comparable cases and parties cannot be filed twice.

*Nebis in idem* is the prohibition against filing a second lawsuit against the same subject, object, and reasons that have already been decided by the court. The purpose of this principle is to preserve the dignity of the court and ensure legal clarity for verdict recipients. According to the legal lexicon, *nebis in idem* is a principle that

indicates it is not acceptable for the court to review and rule a second time on the same case that has already been determined.

*Nebis in idem* is governed by Article 1917 of the Civil Code, which stipulates that the power of a judge's decision that has acquired permanent legal force is limited to the decision's subject matter. To be able to assert this power, it is important that the questions asked and the claims made are same; after all, it is asserted by and against the same parties involved in the same relationship.

*Ne bis in idem* contains the *similia similibus* principle, which states that similar cases must be decided in the same manner. Then there is the *litis finiri oportet* principle, which states that a case that has already been settled by a judge cannot be resubmitted, as outlined in Civil Code Article 19 and Article 1920 Jo Article 134 RV. In the article's explanation, it is stated that a previously resolved case by a court with permanent legal effect (*inkracht van gewijsde*) cannot be resubmitted. Therefore, if the identical case or claim is refiled, the judge must dismiss the case.

In the vicinity of Banda Aceh City, there were three instances in which the object of the lawsuit was an executed object. This definitely generates doubts in the public's mind about the presence of legal certainty. These are the records of litigation involving land rights that have been executed by the Banda Aceh District Court, but remain on trial request:

**Table 1:** List of Lawsuits of Executed Object

Number	The Courte	Case Register	Plaintiff	Defendant
1	Banda Aceh District Court	37/Pdt.G/2018/PN-BNA	Ny.H.Adriani Azhari, et al	Cut Nyak Mehran, et al
2	Banda Aceh District Court	10/Pdt.G/2019/PN-BNA	Muridillah Bin Zamzami	Siti Zulaikha Binti Abdul Manaf, et al
3	Banda Aceh District Court	52/Pdt.G/2019/PN-BNA	Hj.Tjut Zahara	Syarifah Nurmala, et al

**Sources:** <https://sipp.pn-bandaaceh.go.id/>

In the first instance with case registration number 52/Pdt.G.2019/PN-Bna, the Plaintiffs filed a civil lawsuit over a property ownership dispute. Plaintiffs are the heirs of Teuku Zainal Abidin and Hj.Cut Hanifah, who were sued in 2009 by Syarifah Nurmala in case number 27/Pdt.G/2009/PN-BNA. Based on the notion that the case decision number 27/Pdt.G./2009/PN-BNA Jo High Court of Banda Aceh Decision No. 79/Pdt/2010/PT-BNA Jo Supreme Court Cassation Decision No. 586/K/PDT/2011 Jo Supreme Court Review Decision No. 442/PK/PDT/2012 which stated that Syarifah Nurmala properly owned Certificate of Ownership Number 50/1965 and that Certificate of Ownership Number 50/1976 had no legal standing has permanent legal effect, Syarifah Nurmala submitted a request for execution to the Banda Aceh District, resulting in the publication of Minutes of Execution and Demolition of Timber Buildings and Land Transfers number 08/Pdt.Eks/2016 PN-BNA. The court-awarded party, Syarifah Nurmala, then requested a replacement certificate from the Banda Aceh City Land Office, resulting in the issuance of Certificate of Ownership Number 10143, which is now the subject of a lawsuit in case number 52/Pdt.G.2019 PN-BNA.

The plaintiff in the second lawsuit with register number 10/Pdt.G.2019/PN-BNA is the grandson of the late Mrs. Asma. According to the Syar'iyah Court of Banda Aceh Decision No. 0091/Pdt.P/2017/MS.Bna dated July 13, 2017, the Plaintiff has the authority to handle the estate of the late Mrs. Asma. As one of the deceased Mrs. Asma's inheritances, a parcel of land in Lhong Raya Village, Banda Raya District (previously Meuraxa District), Banda Aceh City of around 1,739 M2 (one thousand seven hundred thirty-nine square meters) and bounded as follows

- North with Hj.Umran tanah land
- South with Ali Akbar tanah land
- East with a passage
- West with the land of Johan Harun and Idham Umar

The aforementioned block of land was the subject of civil action number 37/Pdt.G/1994/PN-Bna between Mrs. Asma, the plaintiff, and the late father of Defendant I-Defendant IV, Abdul Manaf Sulaiman, and others, the defendants. In the course of the Court's examination of the case, it was discovered that Abdul Manaf Sulaiman had gifted a portion of the case object to his children, resulting in the issuing of Certificates of Ownership No. 290, No. 291, No. 292, and No. 293. Based on the Supreme Court's decision dated 27 June 1997, number 2844/K/Pdt/1995 Jo, the Aceh High Court's decision in Banda Aceh dated 3 May 1995, number 60/Pdt.Aceh Jo, and the Banda Aceh District Court's decision dated 9 January 1995, number 37/ Pdt.G/1994 PN Bna, a land parcel with an approximate area of 1,739 square meters has been executed. However, in 10/Pdt.G.2019/PN-BNA, a portion of the land has once again become the subject of a lawsuit.

In the most recent case with the register number 37/Pdt.G/2018 PN-Bna, the object of the litigation was executed in 1992. Long before the Plaintiff filed suit Number 37/Pdt.G/2018/PN-Bna, the Banda Aceh District Court Number 37/Pdt.G/1987/PN-BNA published its judgement on March 23, 1988 Jo with decision number 163/Pdt.G/1988/PT-BNA on September 22, 1988 Jo with decision number 1035K/Pdt/1989. In accordance with

the Aceh Execution News Number 11/Pdt.Eks/1992/PN-BNA, the Banda Aceh District Court carried out the execution on November 7, 1992, which was later the subject of the case, namely the Certificate Property Rights Number 24/Rukoh registered in the name of Teuku Syamsul Bahri by the Banda Aceh District Court, which was then handed over to Cut Nyak Meurah as the prevailing party in the case. Then, Cut Nyak Meurah subdivided the land into multiple parcels and sold it to the parties. With case number 37/Pdt.G/2018/PN-Bn, the object's land is being litigated once more.

According to the *litis finiri oppertet* concept, once a case has been determined by a court, no legal action can be taken by any party to overturn that decision. In addition, the legal remedy is considered to contain components of *ne bis in idem* if the same subject matter is submitted a second time. Consequently, if accepted, it will be apparent that there is legal doubt surrounding the judge's ruling and the land registration that is based on the judge's ruling, which has permanent legal effect. In essence, land registration strives to provide legal clarity and protection to the holder of rights to a parcel of land, apartment units, and other registered rights so that they may readily demonstrate their ownership of the rights in question.

The existence of the principle of legal certainty provides protection against arbitrary actions for those seeking justice. This indicates that there is assurance that a person will be able to obtain an expected benefit provided he meets specified criteria. From this perspective, it is clear that without legal certainty, individuals do not know what to do, and in the end, ambiguity occurs, which leads to anarchy as a result of the legal system's indecision. Thus, legal certainty refers to the application of a law that is unaffected by subjective conditions and is clear, permanent, and consistent.

### Research Methodology

This study uses an empirical-judicial research methodology to assess the topic by performing a full investigation at the research site involving direct observation and interviews. The normative approach is used to study and analyze various legal theories and laws and regulations pertaining to the inventory and analysis of laws and regulations pertaining to the object of research, which serves to support the interview results.

Then, interviews are used for data collecting in this field research. Interviews are a technique used to collect information by directly questioning individuals who are presumed to have knowledge of the subject under investigation in order to gather the essential information or data. It seeks to collect comprehensive, exhaustive, and exhaustive data for use in this research. In the meantime, field research is utilized to collect primary data.

The respondents in this study are as follows:

1. Judges of the Banda Aceh City Court
2. Registrar of the Banda Aceh City District Court

The informants in this study are as follows.

1. Head of Banda Aceh City Land Office;
2. Advocate/Legal Counsel

This research was undertaken in the Banda Aceh area, including the Banda Aceh City District Court, Banda Aceh City Land Office, and Banda Aceh City Advocates / Legal Advisors. This is to facilitate the author's investigation and data collection in the observable field, whether directly or indirectly.

### Findings

Permanent legal force entails, in principle, that a ruling has achieved legal force that establishes a permanent and definitive legal relationship between the litigants. This is due to the fact that the legal relationship between the parties is set and definite; specifically, the legal relationship that must be obeyed and completed by the guilty party (the defendant), either voluntarily or with the assistance of legal force.

According to Amran Suadi, execution efforts and activities are impossible so long as the judgment lacks lasting legal effect. This is due to the fact that the new execution acts as a legal and coercive legal action as of the date the decision has permanent legal force, and the losing party does not wish to willingly obey and carry out the decision.

In essence, there are two ways to carry out a court order with permanent legal effect: voluntarily or by execution. Executing the decision voluntarily indicates that the losing party (defendant) entirely complies with the court's ruling. If the defendant has willingly and perfectly cooperated with the contents of the decision, meaning that the contents of the decision have been fulfilled, then there is no need to take coercive action against him (execution). In order to ensure the implementation of the decision's terms voluntarily, the court should prepare an official report on the fulfillment of the decision in the presence of two witnesses, at the location where the decision was implemented, and with the signatures of the court bailiff, the plaintiff, and the defendant.

The second option is to carry out the decision through execution, which means that the losing party, in this case the defendant, does not wish to carry out the judgment's terms voluntarily, so a forceful action called execution is required to ensure that the defendant carries out the decision's terms. Execution must begin with a request from the winning party to the court, so that the losing party may carry out the terms of the judgment. There is no deadline for the winning party to submit an execution request, as there are no rules dictating when the winning party must submit a request for execution. execution request. This departs from the premise that the submission

of an application for execution is the entire right of the prevailing party, despite the fact that it will result in incomplete case resolution and imperfect judicial administration.

In certain instances, parties who believe that a decision with permanent legal effect contains flaws may submit an appeal. According to Muzakir, the difficulty in implementing court rulings stems from divergent opinions and perceptions of whether the decisions can or cannot be implemented, which decisions will be executed, and how court decisions should be implemented. The law stipulates that the court cannot dismiss every case.

In court, judges are responsible for examining, adjudicating, and deciding cases. In performing their duties, Indonesian judges are guided by the applicable laws and regulations. Although it is not rare for a case's essence to be unregulated by the law, the judge is presumed to be familiar with all applicable statutes. Judges are therefore banned from dismissing a matter and are required to consider and try it. This is the principle known as *ius curiae novit*. The *ius curiae novit* concept holds that because the judge knows the law, he must hear every case that is brought before him. This idea is derived from Article 5 paragraph 1 of the Law on Judicial Power, which states: "Judges and constitutional judges are obligated to research, follow, and comprehend the prevailing legal values and sense of justice in society."

Furthermore, this is also regulated in Article 10 of the Law on Judicial Power which states as follows:

1. Courts are barred from declining to examine, hear, and determine a case on the grounds that the law does not exist or is ambiguous; instead, they are required to do so.
2. The provisions referred to in paragraph (1) do not exclude the settlement of civil disputes amicably.

The *ius curiae novit* concept was originally identified in medieval jurists' (*glossators*) works on ancient Roman law. *Ius curiae novit* is the doctrine that the judge is knowledgeable of the law (the court knows the law). Therefore, it is a judge's responsibility to determine what law and how it should be applied to a given instance. This idea has long been recognized in the Civil Law system, therefore contending parties do not need to hypothesize or prove the law that pertains to their case, as the judge is presumed to be familiar with the law.

In the Common Law system, however, this premise is unknown. In the Common Law system, therefore, it is the parties who must postulate the applicable law, which must be presented and explained to a judge to determine whether it is in conformity with or opposed to precedent. Historically, the idea of *ius curiae novit* is associated with the Civil Law legal system and the legism legal school, which holds that the only law is the Law (written Law) and that there are no other laws.

There are several reasons why a judge's decision that has legal force is still being sued, including:

1. The existence of more than one decision containing the same subject matter on the same object with different subjects or the same subject;
2. There is more than one verdict containing the same case from different chambers;
3. Multiple interpretations of the sound of the court's verdict;
4. The object of execution is different from the object of the case;
5. There is no means of control in court to prevent overlapping decisions;
6. All judicial bodies can handle land cases;

In relation to the norm of legal certainty, judges are still inadequately attentive to the laws that exist in society when examining cases. Frequently, for the sake of legal certainty, judges implement the provisions of the law without regard for the evolution of values in a dynamic society. In this instance, the judge is merely a voice for the law. In evaluating cases beginning with the granting of power of attorney, the assessment of claims, evidence, and concluding with conclusions and executions, judges are always confronted with HIR/RBg-regulated procedural law considerations.

Moreover, there are several procedural law provisions that are dispersed throughout numerous regulations, which frequently results in a conflict of regulations. In their implementation, the procedural provisions are primarily governed by the Supreme Court Regulation (PERMA) and the Supreme Court Circular Letter (SEMA), which aim to regulate the judicial procedure only if the provisions in the HIR/RBg are unclear. The rule of law cannot be described as everlasting; rather, it is open, meaning that it is adaptable to external factors. Laws containing external factors might generate an obligation to act. In the examination of civil matters, overly pluralistic legislation and overly legalistic judges frequently impede the execution of a simple, quick, and low-cost trial. The term simple refers to an examination procedure that is straightforward and uncomplicated. The regulations are ambiguous, lend themselves to different interpretations, and do not ensure legal clarity. According to Carl von Savigny, the legislation must be consistent with the national spirit (*volksgeist*).

According to Fatcullah, attorneys are obligated to defend anyone who seek justice from them. In accordance with the provisions of Article 3 of the Indonesian Advocates' Code of Ethics, however, Advocates may refuse to provide legal advice and assistance to any individual who requires legal services and or assistance for reasons that are not in accordance with their expertise and are contrary to their conscience. It is essential to note, however, that an attorney cannot refuse on the basis of differences in religion, creed, race, descent, gender, political beliefs, or social standing. Article 18 of the Law of the Republic of Indonesia Number 18 of 2003 Concerning Advocates prohibits advocates from treating clients differently based on gender, religion, politics, descent, race, or social and cultural background when performing their professional obligations. Article 15 provides that attorneys are permitted to defend cases for which they are liable so long as they adhere to the professional code of ethics and applicable laws and regulations.

### Conclusion

Because there are multiple decisions having the same subject matter on the same object with different subjects or the same subject, a decision that has permanent legal effect and has been performed can be challenged again. The second problem is that there are multiple decisions that review the same case from various rooms, and there is no way for the court to prevent decisions from overlapping. The fact that all judicial organizations are able to handle land cases and executions that take place in locations elsewhere than the subject of the case is still another argument.

### Reference

1. Abdul kadir Muhammad, *Hukum Acara Perdata Indonesia Cetakan ketujuh*, Citra Aditya Bakti, Bandung, 2000.
2. Laila Rasyid M, dkk, *Modul Pengantar Hukum Acara perdata*, Unimal Press, Lhokseumawe, 2015.
3. Marwan dan Jimmy, *Kamus Hukum*, Reality Publisher, Surabaya, 2010.
4. Rosa Agustina, *Perbuatan Melawan Hukum*, FH Universitas Indonesia, Jakarta, 2008
5. Sudikno Mertokusumo, *Hukum Acara Perdata Indonesia Edisi Ketujuh*, Liberty, Yogyakarta, 2006
6. Sudikno Mertokusumo, *Bab-Bab Tentang Penemuan Hukum*, Citra Aditya Bakti, Bandung, 1993.
7. Sarwono, *Hukum Acara Perdata Toeri dan Praktik*, Sinar Grafika, Jakarta, 2011
8. Wirjono Prodjodikoro, *Perbuatan Melanggar Hukum*, Sumur Bandung, Bandung, 2008
9. Yahya Harahap M, *Ruang Lingkup Permasalahan Eksekusi Bidang Perdata*, Sinar Grafika, Jakarta, 1989.
10. Zainal Asikin, *Hukum Acara Perdata di Indonesia Cetakan ketiga*, Prenadamedia Group, Jakarta, 2018.
11. Melani Yustianing .A (eta.al), "Tinjauan Perlawanan Untuk Menunda Eksekusi Dalam Sengketa Perdata (Studi Kasus Perkara No: 8/Pdt.Plw/2000/Pn Probolinggo)", *Jurnal Verstek*, Bagian Hukum Acara Universitas Sebelas Maret, 2014, 2(3).
12. Riswanda Harvianto dan Heri Hartanto, "Pelaksanaan Eksekusi Putusan Pengadilan Terhadap Sebagian Obyek Eksekusi Yang dikuasai Pihak Ketiga (Studi Putusan nomor: 30/Pdt.G/2009/PN.Ska Jo Nomor: 347/Pdt/2009/PT.Smg Jo Nomor: 1274K/Pdt/2010 Jo Nomor: 222PK/Pdt/2015)", *Jurnal Verstek Volume 7 No. 1 Januari-April 2019*.
13. <https://sipp.pn-bandaaceh.go.id/> diakses tanggal 18 Juni 2021
14. Muzakir, Hakim Pengadilan Negeri Kota Banda Aceh
15. Efendi, Panitera Pengadilan Negeri Kota Banda Aceh
16. Fatchullah, Advokat/ Pengacara wilayah Kota Banda Aceh
17. Cut Noni Marlina, Plt Kepala Seksi Pengendalian dan Penanganan Sengketa Kantor Pertanahan Kota Banda Aceh