

Mediator Legal Review of Land Acquisition for the Serang Regency Government Center: Case Study of Decision No. 174/Pdt.G/2024/PN.Srg

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ABSTRACT

This study aims to analyze the legal review of the land acquisition process for the construction of the Serang Regency Government Center with a focus on the case study of Decision No. 174/Pdt.G/2024/PN.Srg. The main problem in this study is the dispute between the landowners and the local government regarding ownership status, land acquisition procedures, compensation determination, and the compliance of the stages implemented with the provisions of laws and regulations, especially Law No. 2 of 2012 concerning Land Acquisition for Development in the Public Interest. This study uses a normative juridical method with a case study approach through analysis of court decisions, laws and regulations, and administrative documents of land acquisition. The results of the study indicate that land acquisition for the project has not fully met the principles of transparency, legal certainty, and justice as mandated in the regulations. Decision No. 174/Pdt.G/2024/PN.Srg emphasizes the importance of valid proof of ownership, substantive deliberation procedures, and the government's obligation to ensure that community rights are fulfilled proportionally. In conclusion, this dispute provides important lessons regarding the need to improve land acquisition governance to be more accountable, participatory, and in accordance with legal norms in order to prevent similar conflicts in the future.

Keywords: Land Acquisition, Legal certainty, Public interest

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INTRODUCTION

The enactment of Law Number 32 of 2004 concerning Regional Government marked a significant milestone in Indonesia's decentralization policy. This regulation grants broader authority to regional governments to manage government affairs independently, in accordance with the characteristics and priorities of each region. This spirit of autonomy aims to increase efficiency, encourage local innovation, and improve public services more equitably (Dasa et al. 2024). However, its implementation on the ground has yielded mixed results, often leading to inefficiencies and development disparities between regions. One major ongoing challenge is land acquisition for development, which often raises complex legal and social issues. To realize social justice and prosperity as mandated by Pancasila and the 1945 Constitution of the Republic of Indonesia, the state is obligated to ensure effective and equitable development. Land, as a strategic and limited resource, plays a central role in supporting this goal (Nr, Warman, and Syofyan 2023). To address the need for land provision for national strategic projects and public facilities, the government issued Government Regulation Number 19 of 2021 concerning the Implementation of Land Acquisition for Development in the Public Interest. This regulation defines land acquisition as the activity of providing land by providing adequate and fair compensation to entitled parties (Government Regulation No. 19 of 2021, Articles 1 and 2) (Jenderal and Yani 2025).

The regulation classifies 23 types of development for the public interest as eligible for land acquisition, including roads, government buildings, educational and health facilities, and public housing. However, the land acquisition process in Indonesia often faces various obstacles such as overlapping ownership, administrative errors, and duplicate certificates, leading to legal uncertainty,

disputes, and public resistance. As a result, many strategic projects experience delays or even fail to materialize. This research examines Case Decision No. 174/Pdt.G/2024/PN.Srg concerning a land dispute in the construction of the Serang Regency government center. The disputed land had been designated a strategic location through Serang Regent Decree No. 593/Kep.001-PL-DPMPTSP/2017, but was claimed by two different parties. The plaintiff based his claim on the Sales and Purchase Agreement (PPJB) and physical possession of the land, while the defendant submitted an old sales deed as the legal basis. This dispute highlights weaknesses in Indonesia's land registration system and the lack of validation (Mataram 2023).

ownership data by the relevant agencies. Mediation efforts failed to reach a resolution, so the case was ultimately brought to court. To analyze this case, this study uses three theoretical approaches: first, the theory of legal certainty, which emphasizes that the law must be clear, consistent, and applicable (Fence M. Wantu, 2011); according to Gustav Radbruch, positive law must be based on facts and be stable (Satjipto Rahardjo, 2012). Second, the theory of land law, which encompasses land rights, ownership systems, and land management by the state (Sudiyono, 2018). Third, the theory of judicial decisions, which explains the judge's deliberation process in balancing normative legal aspects with factual findings in court (Mochtar Kusumaatmadja & Arif Sidharta, 2020). This study aims to analyze whether Decision No. 174/Pdt.G/2024/PN.Srg is in line with Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest, and whether the principles of legal certainty and justice have been applied appropriately in resolving land ownership disputes (Sulaemaniyah and Umami 2024).

METHOD

This research was conducted at the Serang District Court, Banten, Indonesia. As a state based on the rule of law, as affirmed in the 1945 Constitution of the Republic of Indonesia (UUD NRI 1945), legal norms are the primary foundation for regulating social life and serve as guidelines for judicial decision-making. Judges are expected to prioritize a sense of justice over rigid legal certainty, issuing decisions that reflect fairness, legal clarity, and public benefit. The subject of this research relates to a legal dispute in the land acquisition process for the construction of the Serang Regency Government Center, where a unilateral claim to land ownership based on Deed of Sale and Purchase Number 383/Krag/1996 has disadvantaged the rightful owner and resulted in litigation. This research uses a normative or doctrinal legal research method, which analyzes the legal system, statutory provisions, and court decisions relevant to the problem (Bambang Sunggono, p. 43). This method is appropriate for examining legal norms, doctrines, and expert opinions to formulate legal arguments and resolve legal issues. Peter Mahmud Marzuki explains that normative juridical research aims to discover legal rules and doctrines, while Muhaimin emphasizes that this approach helps formulate new legal concepts and solutions to legal problems (Muhaimin, p. 45). This research also uses a descriptive-analytical approach, namely by examining how the law is applied to facts through established legal theories (Donny Hanitijo Soemitro, p. 46) (Gugat, Hak, and Terhadap 2024).

To support this analysis, three main legal approaches are used: the statutory approach, which examines laws relevant to the problem; the case approach, which examines similar court decisions; and the conceptual approach, which considers the views of experts and legal doctrine (Muhaimin, p. 47). Understanding these three perspectives allows researchers to develop strong legal arguments and critique the legal considerations in court decisions. The data used in this research is secondary and obtained through literature review. Primary legal materials include laws and regulations such as Law No. The legal materials used in this study are Law No. 2 of 2012 concerning Land Acquisition for Development in the Public Interest, Government Regulation No. 19 of 2021, and Decision No. 174/Pdt.G/2024/PN.Srg. Secondary legal materials consist of legal commentaries, textbooks, and academic journals. Tertiary legal materials include legal dictionaries and legal encyclopedias. Data collection and processing were carried out based on the stages outlined by Zainuddin Ali (p. 50), which involved a structured literature review of laws and regulations, court decisions, and scholarly works. The research procedure was carried out in stages: identifying legal issues, collecting legal materials, interpreting legal norms based on trial facts, and conducting qualitative legal analysis to

assess court decisions in terms of legal certainty, fairness, and compliance with laws and regulations. The qualitative analysis methods used included reviewing legal texts, comparing them with the facts of the case, and interpreting how the law should be applied in that context. The normative analysis in this study is prescriptive—it not only describes legal problems but also offers legally grounded solutions (Vitrianingsih, Universitas, and Giri 2025).

The validity of the data in this study was ensured through the application of credibility measures, including prolonged engagement, member checking, and triangulation. These techniques were used to ensure that the resulting data and interpretations were accurate and free from bias. Triangulation was conducted using multiple methods (interviews, documents), multiple sources (informants), and multiple theoretical perspectives, in accordance with Norman K. Denzin's framework. The credibility of the findings was assessed based on four criteria: credibility (truthfulness of the findings), transferability (possibility of application in other contexts), dependability (consistency of results), and confirmability (objectivity and transparency). Member checking was conducted by communicating the initial findings to key informants to ensure their accuracy. Triangulation and repeated validation ensured that the conclusions drawn from this study had a strong methodological foundation and accountable legal validity (Mulyono 2023).

FINDING AND DISCUSSION

The Decision Mechanism in Case Number 174/Pdt.G/2024/PN.Srg is in Accordance with Law Number 2 of 2012 concerning Land Acquisition for Public Interest. The Serang District Court Decision Number 174/Pdt.G/2024/PN.Srg represents a serious deviation from the provisions stipulated in Article 42 paragraphs (1) and (2) of Law Number 2 of 2012 concerning Land Acquisition for Development in the Public Interest. This provision clearly states that in the event of a rejection of the form and/or amount of compensation, or a dispute over land ownership, the compensation must be deposited with the court through a consignment mechanism before the land acquisition process can proceed. This provision is intended to ensure legal certainty and protect entitled parties. However, in this case, the consignment process was carried out by the implementing agency without complying with applicable legal procedures. The consignment took place while the land ownership status was still in legal dispute and before a court decision determined the rightful owner. However, based on Article 42 paragraph (2), consignment can only be carried out under certain circumstances: when the entitled party refuses compensation, their whereabouts are unknown, or there is an ownership dispute. Therefore, the implementation of consignment in this case contradicts the normative intent of the provision. Implementing consignment while ownership is still being resolved in court not only violates the principle of legal certainty but also ignores the rights of the party who may ultimately be legally recognized as the owner (Akibat et al. 2022).

In addition to violating Article 42, this process also fails to comply with Article 37 paragraph (1) of Law Number 2 of 2012, which requires deliberation between the Land Agency and the entitled party regarding the form and/or amount of compensation. In this case, there is no evidence that such deliberation was conducted properly and thoroughly. The deposit of compensation through the consignment mechanism was carried out unilaterally without involving the landowner as the party entitled to negotiate. This reflects a violation of the principles of transparency and fairness as stipulated in Article 2 of the same law. Implementing consignment without resolving ownership disputes and reaching an agreement on the form and amount of compensation clearly deviates from the basic principles of land acquisition, namely justice, transparency, and protection of legitimate rights. Although Article 42 permits consignment in the event of a dispute, its implementation must still uphold the principle of legal certainty, which requires that the transfer of land rights only occur after the rightful party has been determined through legal process. In this case, the implementing agency acted prematurely by consigning without waiting for a legally binding court decision (Pangidoan, Franciska, and Hutomo 2022).

Furthermore, the lack of proper deliberation reflects a lack of effort by the implementing agency to reach an agreement before taking the consignment step. The failure to involve the landowner in the dialogue indicates that the process was neither transparent nor participatory. This

clearly violates the mandate of Article 2, which stipulates that land acquisition must be carried out based on the principles of transparency, justice, and equity.

The violation of these normative principles further strengthens the conclusion that the implementation of consignment in this case not only contradicts positive legal norms but also deviates from the spirit of social justice in land acquisition. Specifically, this violates:

1. The Principle of Legal Certainty – because the consignment was carried out while the land ownership status was still in dispute and there had been no court decision determining the legal rightful party, the transfer of rights was carried out without a clear legal entity, thus risking harm to the party ultimately recognized as the rightful owner;

2. The Principle of Transparency and Agreement – because there was no meaningful deliberation between the Land Agency and the landowner. Compensation was unilaterally entrusted without open communication or active participation from the entitled party;

3. The Principle of Justice – because the consignment was not used as a last resort after failed deliberation, but rather was carried out immediately, thus depriving the landowner of the opportunity to raise objections or negotiate appropriate compensation.

Thus, the land acquisition process in this case does not reflect the application of the principles of justice, transparency, and legal certainty as mandated in Article 2 of Law Number 2 of 2012. Violations of these principles undermine the legal legitimacy of the land acquisition process and open the possibility of future disputes that could hamper the implementation of national development projects. Based on an analysis of Decision Number 174/Pdt.G/2024/PN.Srg, it can be concluded that the court decision is inconsistent with the principles and procedures for land acquisition as stipulated in applicable laws and regulations. The consignment was carried out without legal certainty of ownership and without prior deliberation, thus violating the provisions of Article 42 and Article 37 paragraph (1), as well as the basic principles stated in Article 2. These actions undermine the legal legitimacy of the land acquisition process and create an imbalance between state interests and citizens' land rights. The court's decision in case No. 174/Pdt.G/2024/PN.Srg indirectly legitimizes land acquisition practices that are inconsistent with applicable legal principles. Law No. 2 of 2012 was designed to balance national development needs with the protection of citizens' land rights. Therefore, the land acquisition process must be carried out transparently, accountably, and in full compliance with the principles of legal certainty and justice, so that development carried out in the name of the public interest does not create new injustices for affected communities(Pangidoan, Franciska, and Hutomo 2022).

Judge's Mechanism in Deciding Case Number: 174/Pdt.G/2024/Pn.Srg Juridical considerations are the thought processes and assessments undertaken by a judge in reaching a decision on a case. These considerations include an analysis of the facts revealed during the trial, the application of relevant law, and various other factors that may influence the decision, such as fairness, legal certainty, and expediency. (Binsar Gultom) Legal considerations are defined as the stage in which the panel of judges considers the facts emerging during the trial, starting with the indictment, demands, and the defendant's demurrer, in conjunction with evidence that meets formal and material requirements, as presented in the evidence and defense. Legal considerations also include articles in the laws and regulations that serve as the basis for the decision. Judicial considerations are one of the most important aspects in determining the embodiment of the values of the judge's decision, which reflect justice (*ex aequo et bono*) and legal certainty, while also providing benefits to the parties involved. Therefore, judicial considerations must be conducted carefully, meticulously, and thoroughly. (Budiono Kusumohamidjojo) If judicial considerations are not carried out carefully, precisely, and thoroughly, the judge's decision based on those considerations can be overturned by the High Court or the Supreme Court. In examining a case, a judge also requires evidence, the results of which will be used as considerations in deciding the case. Proof-presentation is the most crucial stage in a trial. The purpose of proving the case is to Obtain certainty that an event or fact presented actually occurred is necessary to reach a correct and fair decision. A judge cannot render a decision until he is certain that the event or fact actually occurred and its truth has been proven, thus revealing the legal relationship between the parties(Pangidoan, Franciska, and Hutomo 2022).

In addition, judicial reasoning must essentially encompass the following aspects: (Mukti Arto)

- a. The subject matter and acknowledged or undisputed facts.
- b. A legal analysis of the decision, encompassing all aspects related to the facts proven during the trial.
- c. Each section of the Plaintiff's petition must be considered/assessed individually so the judge can draw a conclusion as to whether the arguments are proven or not, and whether they can be granted in the decision.

In land disputes involving two ownership rights to a single plot of land, the judge will consider several factors to determine legal certainty. Primary considerations include the validity of each certificate, the order in which the certificates were issued, and the good faith of the disputing parties. In addition, the judge will also assess supporting evidence such as certificates, witness statements, and physical control of the land. (Ahmad Rifai) In land disputes involving two certificates of title to a single plot of land, there are two legal remedies available. First, an administrative remedy is carried out by filing an objection with a land authority such as the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN), the BPN Regional Office, or the local Land Office. This is regulated in Article 1 number 16 and Article 76 paragraph (1) of Law Number 30 of 2014 concerning Government Administration, as well as Article 6 paragraphs (1) and (2) of the Minister of ATR/BPN Regulation Number 11 of 2016. If the objection is not addressed or is rejected, the aggrieved party may file an administrative appeal with the relevant official's superior within a maximum of 10 working days of receiving the decision on the objection, in accordance with Article 78 of Law No. 30 of 2014. Second, if the administrative resolution is unsatisfactory, the aggrieved party can file a lawsuit with the State Administrative Court (PTUN). The PTUN has absolute authority to examine and decide disputes arising from state administrative decisions, such as the issuance of land title certificates by the National Land Agency (BPN). These disputes are resolved through the legal process at the PTUN, which includes the stages of examination, evidence, and ultimately a judge's decision. (H. Yodi Martono Wahyunadi)

The legal process in land disputes involving two ownership certificates begins with the administrative stage and the initial examination, where the Court Clerk checks the completeness of the administration, and the Chief Justice decides whether the lawsuit can proceed through deliberation. If the lawsuit meets the requirements, the process continues to a preparatory examination to revise the contents of the lawsuit, followed by the main trial led by the Chief Justice. After examining the evidence and presenting the parties' conclusions, the judge will hold deliberations to decide the case. The verdict is read out in a formal manner. The case is open to the public and can be appealed to the High State Administrative Court (PTTUN) within 14 days of the verdict being pronounced. During the legal process, the defendant is prohibited from making any changes to the disputed land until a legally binding decision is issued. Case Position The plaintiff is the legal owner of a 2,076 m² plot of land located in Cisait Village, Kragilan District, Serang Regency, based on Land Ownership Certificate (SHM) No. 1665/Cisait of 2006 in the name of Jajang Lesmana. The land was acquired through a valid and fully paid sale and purchase transaction, as evidenced by the Sale and Purchase Agreement (PPJB) No. 39 and Power of Attorney No. 40 dated December 31, 2015. The plaintiff has physical control of the land and has fulfilled all related tax obligations (Satria 2021).

The purpose of land registration, as stipulated in Government Regulation No. 24 of 1997 concerning Land Registration, is "To provide legal certainty and protection to rights holders of a plot of land so that they can easily prove themselves as the rights holders." (Article 3, Government Regulation No. 24 of 1997) Furthermore, Article 32 paragraph (1) of the same regulation states "A certificate constitutes valid evidence as strong proof of the physical and legal data contained therein, as long as such data corresponds to that contained in the general register and the measurement letter."

The Plaintiff's land was included in a land acquisition project for the development of a supporting area for the Serang Regency Government, as determined by the Regent of Serang. The land is registered in the Nominative List under Field Sequence Number (NUB) 63, with an affected

area of 2,122 m². However, Defendant I filed an objection, claiming ownership based on the 1996 Deed of Sale and Purchase. However, he was unable to provide valid proof or a registered title certificate, and the claim is not included in the land's legal history. Furthermore, Defendant I never took any formal legal action, either administratively or through litigation. Despite Defendant I's objection being baseless, Defendants II and III accepted and acted upon it without careful verification, resulting in a delay in payment of compensation to the Plaintiff. In fact, according to Article 32 paragraph (2) of Government Regulation No. 24 of 1997, land certificates that have been registered and held in good faith for five years or more cannot be contested, unless there can be evidence of bad faith or fraud. Defendants II and III's failure to verify the legal status of the objection has hindered the Plaintiff's right to receive legitimate compensation and directly harmed the Plaintiff in the land acquisition process for the public interest (Agung et al. 2020).

Legal Considerations of the Panel of Judges play a crucial role as formulators and interpreters of legal values that exist within society. Therefore, in adjudicating a case, a judge is expected not only to apply the law textually but also to reflect a sense of community, justice and norms that apply in society. As stated in Article 50 Article 1 paragraph (1) of Law Number 48 of 2009 concerning Judicial Power, it states that every court decision must contain reasons, legal basis, and references to provisions of laws and regulations or unwritten legal sources that are used as a basis for deciding the case. The principle of impartiality also applies, which means that although judges must be personally neutral, they are still obliged to side with truth and justice based on legal facts. Based on the author's interview with the Serang District Court regarding the legal considerations in case No. 174/Pdt.G/2024/PN.Srg, the Plaintiff essentially filed a petition with the court to declare Defendant I, Defendant II, and Defendant III to have committed an unlawful act. The Plaintiff also requested to be declared the sole legal owner of a 2,122 square meter plot of land registered in the nominative register as Plot No. 63, and the sole party entitled to receive compensation for the land acquisition for public purposes—specifically for the development of the Serang Regency Government Center Supporting Area in Cisait Village, Serang Regency, Banten Province (Harlyne 2022).

The Plaintiff claimed to be entitled to compensation for Plot No. 63, the object of the land acquisition. However, Defendant I filed an objection, stating that they were the legal owners of the land because it was registered in their names. Both the Plaintiff and Defendant I claimed to be the owners of Plot No. 63 and were entitled to receive compensation. Because the ownership dispute remained unresolved, Defendant III then deposited the compensation funds through a consignment process with the Serang District Court, which then issued a Consignment Order. Legal considerations of the Serang District Court. Defendant I should have been declared the rightful owner because he possessed valid proof of ownership in the form of a Deed of Sale and Purchase (AJB). Meanwhile, the Plaintiff did not possess such a deed. The author argues that the AJB is an official document prepared by the Land Deed Official (PPAT) and serves as legal evidence of the sale and purchase transaction between the seller and buyer. However, it is acknowledged that judges have the freedom to interpret the law and express their opinions based on the facts and legal considerations in the case (Harlyne 2022).

CONCLUSIONS

The findings of this study indicate that the land acquisition mechanism as stipulated in Decision Number 174/Pdt.G/2024/PN.Srg is not fully in accordance with the provisions of Law Number 2 of 2012, where the consignment process is carried out before there is legal certainty of land ownership. This is contrary to the provisions that require prior deliberation and place consignment as a last resort. The judge's legal considerations in the decision also do not reflect important aspects such as proof of ownership, the sequence of certificate issuance, and the good faith of the parties, thus ignoring the principles of legal certainty and justice. This study contributes to highlighting the importance of applying fair legal principles in the land acquisition process, as well as providing recommendations to judges and the government to improve transparency and fairness in the implementation of land acquisition. The implications of this study indicate that non-compliance with legal procedures can lead to violations of landowners' rights and create legal

uncertainty. The limitation of this study lies in its focus on only one court decision, so the findings cannot be generalized to all similar cases. Further research is recommended to conduct comparative studies of similar cases in various regions to evaluate the consistency of legal application. This paper explicitly answers the research questions regarding compliance with Law Number 2 of 2012 and the role of judges in protecting land ownership rights, and emphasizes the importance of reform in the land acquisition process for the public interest.

REFERENCES

- Agung, Mahkamah, Nomor K Pdt, Yadzka Nafis, Beli Tanah, D I Kota, Solok Studi, Putusan Mahkamah, and Agung Nomor. 2020. "DALAM JUAL BELI TANAH DI KOTA SOLOK (STUDI PUTUSAN" 2.
- Akibat, Tanah, Sengketa Kepemilikan, H A K Atas, and A L Ahmad Saleh. 2022. "No Title," no. 08.
- Dasa, Guslihan, Cipta Matondang, Hasim Purba, Rosnidar Sembiring, and Edy Ikhsan. 2024. "JIIC : JURNAL INTELEK INSAN CENDIKIA Vol: 1 No: 9 , November 2024 ANALISIS YURIDIS SERTIFIKAT HAK PAKAI PEMERINTAH KOTA BITUNG YANG DIKELUARKAN TANPA IZIN PEMEGANG HAK MILIK ATAS TANAH (Studi Putusan Nomor 272 / PDT . G / 2019 / PN . BIT . November: 4690–4705.
- Gugat, Tanggung, Sengketa Hak, and Pertanahan Terhadap. 2024. "ManBiz: Journal of Management & Business ManBiz: Journal of Management & Business" 3: 501–11. <https://doi.org/10.47467/manbiz.v3i3.7194>.
- Harlyne, Adelina Clarisa. 2022. "Perlindungan Hukum Pembeli Beritikad Baik Dengan Kedudukan Berkuasa Dari Tanah Dan Bangunan Warisan Yang Belum Bisa Dikuasai Dikarenakan Permasalahan Internal Penjual (Studi Kasus Putusan Mahkamah Agung Nomor 786 PK / PDT / 2020) Perlindungan Hukum Pembeli Beritikad Baik Dengan Kedudukan Berkuasa Dari" 4.
- Jenderal, Universitas, and Achmad Yani. 2025. "LEGAL REVIEW OF THE ISSUANCE OF LAND CERTIFICATES BASED" 6 (4): 1–20.
- Mataram, Universitas Muhammadiyah. 2023. "BERITIKAD BAIK PADA JUAL BELI HAK ATAS TANAH" 6 (2): 479–91.
- Mulyono, Amos Raynaldo. 2023. "No Title," no. 28.
- Nr, Fahmi Akbar, Kurnia Warman, and Syofirman Syofyan. 2023. "PENYELESAIAN SENGKETA KEPEMILIKAN TANAH PADA KANTOR PERTANAHAN KOTA SOLOK (STUDI KASUS SENGKETA TANAH ANTARA PT GELORA GANTO SEJAHTERA DAN SYAMSU TULUS)" 5 (4): 4732–52.
- Pangidoan, Daniel, Wira Franciska, and Putra Hutomo. 2022. "GANDA HAK ATAS TANAH DI PENGADILAN NEGERI," 7–12.
- Satria, Opan. 2021. "Analisis Yuridis Perlindungan Hukum Terhadap Pembeli Tanah Yang Beritikad Baik Atas Pembatalan Sertifikat Oleh Pengadilan," no. September: 67–86.
- Sulaemaniyah, Nur, and Alan Mustafa Umami. 2024. "Jurnal Private Law Fakultas Hukum Universitas Mataram Analisis Yuridis Perlindungan Hukum Terhadap Pembeli Yang Beritikad Baik Berdasarkan Putusan Ma Nomor 3753 K / Pdt / 2020 Legal Analysis of Legal Protection for Good Faith Buyers Based on Supreme Court Decision Number" 4 (1).
- Vitrianingsih, Yeni, Hukum Universitas, and Sunan Giri. 2025. "Perlindungan Hukum Bagi Pembeli Tanah Beritikad Baik Atas Sertifikat Ganda" 3 (April): 140–50.