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Editorial Office: postgraduate at Riau Islamic University, Universitas Islam Riau, Pekanbaru, Indonesia.

Phone: +62 85234073707, +62 85329106484

E-mail: law_s3@uir.ac.id

Website : <https://pps.uir.ac.id/icls2024/>

RESPONSIBILITY OF HUMANITARIAN VALUES AND JUSTICE OF THE EXECUTION APPLICANT, REGARDING THE SAFETY OF THE EXECUTION RESPONDENT'S PROPERTY: CASE STUDY: RULING No. 109/Pdt/2016/PT.Pbr

Bintang Arbakmis^a, Tamrin^b, Abd Thalib^c

^aIslamic University of Riau, faculty of Law Islamic
Bintang_arbakmis@student.uir.ac.id

^bIslamic University of Riau, faculty of Law Islamic
Tamrins@law.uir.ac.id

^cIslamic University of Riau, faculty of Law Islamic
thalib@law.uir.ac.id

Abstract:

The Execution System is the embodiment of regulations regarding a form of coercive action in the implementation of court decisions, the implementation of decisions of quasi-judicial institutions, and certain legal documents. With the issuance of decision Number 109/PDT/G/2016/PT.PBR, execution is not just a system but is a hope, guarantee, and means to fulfill justice for execution applicants. Execution is a solution to ensure the safety of the property belonging to the applicant for execution. The main problems in this research are: 1) what is the responsibility of the execution applicant's human values and justice towards the safety of the execution applicant's property: Case study of decision No. 109/Pdt/2016/PT.Pbr, at the Dumai District Court; 2) what are the obstacles to the respondent's execution of decision case no. 109/Pdt/2016/PT.Pbr, at the Dumai District Court. The research method used is normative juridical with analytical descriptive research specifications. From the results of this research, execution system regarding the responsibility of the execution applicant's human values and justice, towards the safety of property belonging to the execution applicant: Case study of decision no. 109/Pdt/2016/PT.Pbr, at the Dumai District Court, legal protection must be given in accordance with the Directorate General of General Justice 2019 concerning execution guidelines in district courts regarding the stages of execution and Article 196 HIR / 207 RBg, but after a material review regarding this Law, its regulation and implementation is in accordance with Constitutional Court Decision No. 18/PUU-XVII/2019 and Indonesian National Police Regulation No. 8 of 2011 concerning Securing the Execution of Collateral. As for the obstacles to the respondent's execution in decision case no. 109/Pdt/2016/PT.Pbr, at the Dumai District Court, these are, among other things, Internal Factors: 1) not all execution teams are able to carry out voluntarily and without guarantees of safety 2) not all execution teams have a good social and religious spirit in carrying out execution. External Factors: 1) the party being executed is difficult to find, 2) there is no good faith on the part of the person being executed.

Keywords: *Responsibility, Human Values, Justice, Execution, Dumai District Court*

I. Introduction

Execution is carrying out a Court Decision which has Permanent Legal Force

(Inkracht Van Gewijsdee), which is punitive (Condemnatoir), where this execution is carried out by force, if necessary with the

help of general power. The types of Execution are: 1) Execution of the Decision punishing the Party to make payment of money; 2) Execution of the Decision punishes the Party for committing an act; 3) Execution of the Decision punishes the Party to surrender, vacate.

Court decisions that have permanent legal force (in ckracht van gewijsde) are one source of law that must be obeyed. Indonesia has been independent for 78 years, but rule of law, law enforcement, equality before the law, and legal compliance are still chaotic. Even though Indonesia is a legal state; based on law (rechtsstaat), not based on mere power (machtsstaat), it turns out that non-compliance with the law is not only carried out by society but also by state institutions.¹

The aim of the Republic of Indonesia is to protect the entire Indonesian nation and all of Indonesia's blood, promote general welfare, educate the life of the nation, and participate in implementing world order based on independence, eternal peace and social justice. The President of the Republic of Indonesia holds the power of the government of the Republic of Indonesia, assisted by state ministers who are in charge of certain affairs in the government. State institutions which are under the authority of the president, are obliged to uphold order, justice, truth and legal certainty that are able to provide protection to the community.²

Court decisions that have permanent legal force in civil cases regarding land

ownership disputes are executed against private parties accompanied by vacation. If the executed party is not willing to be executed, the court can request assistance from state authorities to carry out coercive measures.³

However, if the party to be executed is a state institution, in this case a state defense institution that is unwilling to comply with the law, then the court bailiff will have difficulty asking for assistance from state power tools to carry out coercive measures. Non-compliance with the law creates legal uncertainty, thus creating injustice. In Indonesia there has never been an execution of vacating state-owned land used by state defense institutions, even though a court decision has been obtained which has permanent legal force. This is caused by non-compliance by state defense institutions with court decisions that have permanent legal force, and the absence of state power tools that are willing to assist court bailiffs in carrying out coercive measures. In fact, in accordance with Article 28D paragraph (1) of the 1945 Constitution, every person has the right to recognition, guarantees, protection and fair legal certainty as well as equal treatment before the law.⁴

Meanwhile, the court is an institution tasked with administering justice to uphold the truth, achieving justice, order and legal certainty. Judiciary in Indonesia is a whole system that must be seen, accepted and applied as a whole consisting of parts that

¹ Debora R.N.N.Manurung, "Perlindungan Hukum Debitur Terhadap Parate Eksekusi Obyek Jaminan Fidusia," *Jurnal Ilmu Hukum Legal Opinion* 3, no. 2 (2015): 1–8.

² Hikmah Nurul Hidayah and Siti Malikhatun Badriyah, "Prosedur Eksekusi Objek Lelang Hak Tanggungan Dimana Objek Masih dikuasai Pihak Lain," *Notarius* 15, no. 1 (2022): 350–64, <https://doi.org/10.14710/nts.v15i1.46046>.

³ Reza Sandia Damanik, "Pelaksanaan Eksekusi Putusan Pengadilan Hubungan Industrial Yang Nilai

Gugatannya Di Bawah Rp. 150.000.000,- Di Pengadilan Negeri Pontianak," *Gloria Yuris Jurnal Hukum Mahasiswa* 2, no. 3 (2014).

⁴ Syprianus Aristeus, "Eksekusi Ideal Perkara Perdata Berdasarkan Asas Keadilan Korelasinya Dalam Upaya Mewujudkan Peradilan Sederhana, Cepat Dan Biaya Ringan," *Jurnal Penelitian Hukum De Jure* 20, no. 3 (2020): 379, <https://doi.org/10.30641/dejure.2020.v20.379-390>.

must not conflict. For the integrity of the system, it is necessary to apply legal principles that guarantee the integrity of the system.⁵ For example, the principle of *res judicate proveri tate habetur* which is that every court decision must be considered valid as long as it is not overturned by a higher court. The integrity of the legal system, including the integrity of the justice system, is largely determined by the implementation of the law. The implementation of the law determines whether the legal system and judicial system in Indonesia are implemented consistently or not. Satjipto Rahardjo stated: "Laws are made to be implemented. Therefore, it is not surprising if people say that the law can no longer be called law if it is never implemented (again)"⁶

For example, the case at the Dumai District Court in the case of Decision No. 109/Pdt/2016/Pt.Pbr. Decisions on the use of power, and/or actions against members of the public cannot be treated arbitrarily as objects, but must be in accordance with the provisions of laws and regulations and general principles of good governance.⁷ Services to the community and law enforcement carried out in the context of state and government administration are an inseparable part of efforts to create good, clean and efficient government in order to improve welfare and create justice and legal certainty for all citizens as intended in the Law. The

Foundation of the Republic of Indonesia in 1945⁸

Everyone has the right to protect themselves, their family, honor, dignity and property rights. Every person has the right to own property, either alone or together with others for the development of himself, his family, nation and society in a way that does not violate the law. No one may be deprived of his property arbitrarily and unlawfully. Every person, without discrimination, has the right to obtain justice by submitting applications, complaints and lawsuits, whether in criminal, civil or administrative cases and to be tried through a free and impartial judicial process, in accordance with procedural law which guarantees an objective examination by a judge. honest and fair to obtain a fair and correct decision. The government is obliged and responsible to respect, protect, uphold and promote human rights as regulated in statutory regulations and international law regarding human rights accepted by the Republic of Indonesia.⁹

Carrying out a certain action / stopping an action. The execution is carried out by the Execution Petitioner who wishes to obtain legal certainty regarding his rights which he has not experienced so far, which is hampered by the Execution Respondent not wanting to carry out the Decision which has Permanent Legal Force (Inkracht Van Gewijsdee) voluntarily, then Therefore, the Execution Petitioner submitted a Petition to

⁵ dan Iffah Nurhayati Sri Hartini, Setiati Widiastuti, "Eksekusi Putusan Hakim Dalam Sengketa Perdata Di Pengadilan Negeri Semarang," *Jurnal Civics Volume* 14, no. 2 (2017): 128–38, <https://doi.org/10.35315/dh.v24i2.9549>.

⁶ Ahyar Ari Gayo, "Problematic in The Civil Decision Execution Process in Indonesia in Order to Realize Court Excellence," *Jurnal Penelitian Hukum De Jure* 22, no. 4 (2022): 551, <https://doi.org/10.30641/dejure.2022.v22.551-560>.

⁷ Yuni Priskila Ginting et al., "Sosialisasi Terkait Hasil Eksekusi Riil Yang Melebihi Batas Eksekusi

Terkait Sengketa Tanah," *Jurnal Pengabdian West Science* 02, no. 10 (2023): 905–15, <https://doi.org/10.58812/jpws.v2i10.676>.

⁸ Yanuar Putra Erwin, "Kajian Yuridis Mengenai Pelaksanaan Eksekusi Dalam Pengadaan Hubungan Industrial," *Jurnal Legislasi Indonesia* 12, no. 4 (2015): 1–21, <https://ejournal.peraturan.go.id/index.php/jli/article/view/421>.

⁹ Rahmawati Kasim, "Eksekusi Yang Tidak Dapat Dijalankan Menurut Hukum Acara Perdata," *Lex Et Societatis* 5, no. 1 (2017): 74–82, <https://doi.org/10.35796/les.v5i1.15166>.

the Court, requesting that a Forced Execution be carried out. As long as the execution has not been carried out, the decision which has permanent legal force will be in vain, and carrying out the execution itself will take a long time, require large costs, plus the assets belonging to the respondent for execution must be secured / conditioned, and still there are many more, all of which must be borne by the Execution Petitioner in Case No. 109/Pdt/2016/PT.Pbr.

Based on the above, dispute resolution in court is still far from being simple, fast and low cost. Seeing the problem that has been described in the background above, the author carried out research with the title Responsibility Of Humanitarian Values And Justice Of The Execution Applicant, Regarding The Safety Of The Execution Respondent's Property: Case Study: Ruling No. 109/Pdt/2016/PT.Pbr

II. Legal Materials and Methods

Judging from its type, this research can be classified as normative legal research or library research methods, namely legal research carried out by reviewing and researching library materials in the form of primary legal materials and secondary legal materials. Secondary data in this type of research is divided into three types of data, namely primary legal materials, secondary legal materials, and tertiary legal materials.

¹⁰ Brina Saskya Paramita Setiawan, Gilang, Shailawa Ramb Madani, "Pelaksanaan Eksekusi Riil Terhadap Tanah Dan Bangunan Dalam Penyelesaian Perkara Perdata (Studi Penetapan Ketua Pengadilan Negeri Madiun Kelas 1B Nomor 02 / Pen . Pdt . Eks / 2021 / PN Mad) Shailawa Ramb Madani Lintang Yudhantaka How to Cite : Gilang Se," *Sultan Jurisprudence: Jurnal Riset Ilmu Hukum* 3, no. 1 (2023): 1–7.

¹¹ Gayo, "Problematic in The Civil Decision Execution Process in Indonesia in Order to Realize Court Excellence."

Primary legal materials are legal materials originating from: the 1945 Constitution of the Republic of Indonesia.¹⁰

Secondary legal materials, namely legal materials that provide explanations of primary legal materials such as draft laws, research results, scientific work from experts law, and so on. After going through the process of data collection and data processing, the data is then analyzed qualitatively descriptively, this analysis technique does not use statistical figures, but rather an explanation in the form of sentences that are presented in a straightforward manner. The data that has been analyzed and described is then concluded using a deductive method, namely deducing from general statements into specific statements.

III. Result and Discussion

Execution

According to R. Subakti "Execution is an effort from the party involved won in a decision to get what is rightfully his with the help of general force (police, military) to coerce parties who is defeated to carry out the verdict."¹¹ Meanwhile, Sudikno provides a definition of execution or enforcement.¹²

The judge's decision is essentially nothing other than the realization of an obligation parties concerned to fulfill the achievements stated in the decision.¹³ Execution is the implementation of a Court

¹² Muzakkir Abubakar Cut Ella Muliarsari, "Case Study Of The Supreme Court Decision Number: 1931/K/PDT/2009 Concerning Implementation Of Real Execution On The Dispute Object Of Shop-House Buildings," *JIM Bidang HukumKeperdataan* 6, no. 1 (2020): 36–43.

¹³ Setiawan, Gilang, Shailawa Ramb Madani, "Pelaksanaan Eksekusi Riil Terhadap Tanah Dan Bangunan Dalam Penyelesaian Perkara Perdata (Studi Penetapan Ketua Pengadilan Negeri Madiun Kelas 1B Nomor 02 / Pen . Pdt . Eks / 2021 / PN Mad) Shailawa Ramb Madani Lintang Yudhantaka How to Cite : Gilang Se."

Decision which has permanent legal force (in kracht van gewijsde) which is carried out by force because the party is the loser in the case does not want to comply with the implementation of the Court Decision procedures.¹⁴

In Art 195 HIR/Article 207 RBG said: "It is hala to carry out decisions. District Court in cases that are examined at the first level by the District Court on the orders and duties of the Chief Justice of the court the state which at the first level examines the case according to the method which are regulated in the HIR articles. Furthermore, in Article 196 HIR/Article 208 RBG it is said: "If the party who is said to be unwilling or negligent to comply with the ruling In a peaceful trial, the party wins the case submit an application to the Chairman of the District Court to implement the Court's Decision."¹⁵

Then Chairman of the District Court summon the party who lost the law and issue a warning (aanmaning) so that the losing party in the case fulfills the order court decision within a maximum period of 8 (eight) days.¹⁶

Responsibility Of Humanitarian Values And Justice Of The Execution Applicant

The responsibility of the Execution Petitioner's human values and justice towards the safety of the Execution Respondent's property in Decision No. 109/Pdt/2016/PT.Pbr, the safety of the property of the

Execution Respondent should not be the responsibility of the Execution Applicant, because this cannot be borne by the Execution Applicant, who should have received/obtained his rights (land/building) under the circumstances blank.¹⁷

With the Execution Guidelines In The State Courts issued by the Directorate General of the General Judicial Body of the Supreme Court of the Republic of Indonesia, which states: Executions are carried out and carried out with due regard for human values and justice, in a persuasive and not arrogant manner, for example by ordering the Execution Petitioner to prepare a holding warehouse, to store the goods belonging to the Execution Respondent within the specified time, at the expense of the Petitioner.¹⁸

And the Chairman of the District Court is expected to be able to coordinate with local security forces, craftsmen, porters, equipment, to secure the Execution Respondent's property. This is all the responsibility of the Execution Applicant.¹⁹

Based on the Guidelines For Execution In State Courts issued by the Directorate General of the General Judicial Body of the Supreme Court of the Republic of Indonesia above, it is certainly very detrimental to Execution Petitioners, because not all Execution Petitioners, especially in (Case No. 109/Pdt/2016/PT.Pbr) have the costs to

¹⁴ Erwin, "Kajian Yuridis Mengenai Pelaksanaan Eksekusi Dalam Pengadaan Hubungan Industrial."

¹⁵ Harjono Adityo Wahyu Wikanto, Safrudin Yudowibowo, "Eksekusi Riil Dalam Perkara Perdata Tentang Pengosongan Tanah Dan Bangunan Rumah," *Jurnal Verstek* 2, no. 2 (2014): 4–10, <http://journal.unigha.ac.id/>.

¹⁶ Asdian Taluke, "Eksekusi Terhadap Perkara Perdata Yang Telah Mempunyai Kekuatan Hukum Tetap (Ingkraah) Atas Perintah Hakim Dibawah Pimpinan Ketua Pengadilan Negeri," *Lex Privatum* 1, no. 4 (2013): 24–35, <https://ejournal.unsrat.ac.id/index.php/lexprivatum/article/view/3060>.

¹⁷ Alfara, "Perlindungan Hukum Bagi Pemenang Lelang Eksekusi Hak Tanggungan Dalam Hal Objek Lelang Yang Tidak Sesuai Dengan Pengumuman Lelang (Studi Kasus Putusan Pengadilan Negeri Manado Nomor 123/PDT.G/2018/PN.MND.)."

¹⁸ Tami Rusli Rahmad Apriyandi, "Analisis Yuridis Faktor Penghambat Pelaksanaan Eksekusi Putusan Peninjauan Kembali Nomor 199PK/Pdt/2007 (Studi Kasus Eksekusi Tanah Di Kec. Jati Agung Desa Jatimulyo)," *Jurnal Pahlawan* 4, no. 2 (2021): 10–15.

¹⁹ Sri Hartini, Setiati Widihastuti, "Eksekusi Putusan Hakim Dalam Sengketa Perdata Di Pengadilan Negeri Semarang."

implement In this case, the Execution Petitioner has suffered too many losses, both during the case process until the Decision has Permanent Legal Force, plus the mechanism mentioned above, this is an injustice to the Execution Petitioner, where he should have received Legal Certainty for his Rights but is instead burdened with with guidelines from the Directorate General of the General Judicial Body of the Supreme Court of the Republic of Indonesia, and the Chairman of the Dumai District Court, must implement them.²⁰

Meanwhile in Article 195-224 HIR and Article 206-258 RBg, which regulates how to carry out Court Decisions or what is called Execution.²¹ From this legal basis, it can be seen that there is a guarantee for the implementation of executions for Execution Petitioners who submit Execution Requests to the Court, but in fact the Dumai District Court (Chairman) still adheres to the Guidelines from the Directorate General of the General Judicial Body of the Supreme Court of the Republic of Indonesia, so whether the Petitioner likes it or not Executors must follow the mechanisms of these Guidelines, such as providing security personnel, providing warehouses, etc., for the assets and belongings of the Execution Respondent.²²

Obstacles in Execution

Execution is a matter of carrying out a decision court that has legal force still. Executed court decision is a court decision that contains order to one of the parties to pay some money or also implementation of the judge's decision order the emptying of fixed

objects, while the losing party doesn't want to carry out the decision voluntarily so it requires coercive efforts from court to implement it.

In carrying out an execution court decisions, implementing officials execution must refer or be guided to the verdict. The executor does not may exceed or reduce. But you have to carry out according to the ruling. Therefore, the decision becomes an object important to discuss. Amar or decision dictum is the relevant statement with the status and legal relationship between the parties with the object goods disputed. And also contains the command or punishment or common law which imposed on the litigants.

Decisions must be clear and concise the formula. No multiple interpretations. Announce the verdict which is unclear, vague and has multiple interpretations, clearnot executablebecause it can create the executor becomes doubtful, resulting in the outcome the implementation of its work is also doubtful. Whereas The nature of legal provisions is that they must be clear and the meaning is certain and there are no multiple interpretations and no doubt.

Obstacles in Implementing the Execution of Decision No. 109/Pdt/2016 /PT.Pbr. At the Dumai District Court there are: From the Execution Petitioner: 1) Not all Execution Applicants have higher costs implementation of Execution; 2) The Execution Applicant feels that the existence of the Guidelines is unfair Implementation of Execution from the Directorate General of the General Judicial Agency Republic of Indonesia Supreme Court. From the

²⁰ M Ichsan Alfara, "Perlindungan Hukum Bagi Pemenang Lelang Eksekusi Hak Tanggungan Dalam Hal Objek Lelang Yang Tidak Sesuai Dengan Pengumuman Lelang (Studi Kasus Putusan Pengadilan Negeri Manado Nomor 123/PDT.G/2018/PN.MND.)," *Indonesian Notary* 2, no. 29 (2020): 622–45.

²¹ Evie Hanavia, "Eksekusi Hak Tanggungan Berdasarkan Title Eksekutorial Dalam Sertifikat Hak Tanggungan," *Jurnal Repertorium Volume IV*, no. 1 (2017): 21–27.

²² Erwin, "Kajian Yuridis Mengenai Pelaksanaan Eksekusi Dalam Pengadaan Hubungan Industrial."

Execution Respondent: 1) Not all Execution Respondents are willing to carry out the Decision properly volunteer; 2) And not all Execution Respondents have a conscious,

IV. Conclusion and Suggestion

Execution is a step that is expected by the Execution Petitioner to get their rights back, the Execution Petitioner should no longer be burdened with many mechanisms and large costs, let alone the obligations of the Execution Respondent, the Execution Petitioner is also the one who does it, where is the justice for the Execution Petitioner.

And the Execution Respondent should carry out the Decision which has permanent legal force, voluntarily, and carry out his own obligations, in order to minimize costs and obstacles in carrying out the Execution.

Therefore, it is necessary to create statutory regulations that more specifically regulate this issue.

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References

- Adityo Wahyu Wikanto, Safrudin Yudowibowo, Harjono. "Eksekusi Riil Dalam Perkara Perdata Tentang Pengosongan Tanah Dan Bangunan Rumah." *Jurnal Verstek* 2, no. 2 (2014): 4–10. <http://journal.unigha.ac.id/>.
- Alfara, M Ichsan. "Perlindungan Hukum Bagi Pemenang Lelang Eksekusi Hak Tanggungan Dalam Hal Objek Lelang Yang Tidak Sesuai Dengan Pengumuman Lelang (Studi Kasus Putusan Pengadilan Negeri Manado

social spirit of his obligations, and not harm other people (in particular Execution Applicant.²³

Nomor 123/PDT.G/ 2018/PN.MND.).” *Indonesian Notary* 2, no. 29 (2020): 622–45.

Apriyandi, Tami Rusli Rahmad. "Analisis Yuridis Faktor Penghambat Pelaksanaan Eksekusi Putusan Peninjauan Kembali Nomor 199PK/Pdt/2007 (Studi Kasus Eksekusi Tanah Di Kec. Jati Agung Desa Jatimulyo)." *Jurnal Pahlawan* 4, no. 2 (2021): 10–15.

Aristeus, Syprianus. "Eksekusi Ideal Perkara Perdata Berdasarkan Asas Keadilan Korelasinya Dalam Upaya Mewujudkan Peradilan Sederhana, Cepat Dan Biaya Ringan." *Jurnal Penelitian Hukum De Jure* 20, no. 3 (2020): 379. <https://doi.org/10.30641/dejure.2020.v2.0.379-390>.

Cut Ella Muliasari, Muzakkir Abubakar. "Case Study Of The Supreme Court Decision Number: 1931/K/PDT/2009 Concerning Implementation Of Real Execution On The Dispute Object Of Shop-House Buildings." *JIM Bidang HukumKeperdataan* 6, no. 1 (2020): 36–43.

Damanik, Reza Sandia. "Pelaksanaan Eksekusi Putusan Pengadilan Hubungan Industrial Yang Nilai Gugatannya Di Bawah Rp. 150.000.000,- Di Pengadilan Negeri Pontianak." *Gloria Yuris Jurnal Hukum Mahasiswa* 2, no. 3 (2014).

Erwin, Yanuar Putra. "Kajian Yuridis Mengenai Pelaksanaan Eksekusi Dalam Pengadaan Hubungan Industrial." *Jurnal Legislasi Indonesia* 12, no. 4 (2015): 1–21. <https://ejournal.peraturan.go.id/index.php/jli/article/view/421>.

Gayo, Ahyar Ari. "Problematic in The Civil Decision Execution Process in Indonesia in Order to Realize Court Excellence." *Jurnal Penelitian Hukum*

²³ Cut Ella Muliasari, "Case Study Of The Supreme Court Decision Number: 1931/K/PDT/2009

Concerning Implementation Of Real Execution On The Dispute Object Of Shop-House Buildings."

- De Jure* 22, no. 4 (2022): 551.
<https://doi.org/10.30641/dejure.2022.v2.2.551-560>.
- Hanavia, Evie. “Eksekusi Hak Tanggungan Berdasarkan Title Eksekutorial Dalam Sertifikat Hak Tanggungan.” *Jurnal Repertorium Volume IV*, no. 1 (2017): 21–27.
- Hidayah, Hikmah Nurul, and Siti Malikhatun Badriyah. “Prosedur Eksekusi Objek Lelang Hak Tanggungan Dimana Objek Masih dikuasai Pihak Lain.” *Notarius* 15, no. 1 (2022): 350–64.
<https://doi.org/10.14710/nts.v15i1.46046>.
- Kasim, Rahmawati. “Eksekusi Yang Tidak Dapat Dijalankan Menurut Hukum Acara Perdata.” *Lex Et Societatis* 5, no. 1 (2017): 74–82.
<https://doi.org/10.35796/les.v5i1.15166>.
- Priskila Ginting, Yuni, Novia Naibaho, Athaya Meliala, and Merdiansyah Maulana Mahendi. “Sosialisasi Terkait Hasil Eksekusi Riil Yang Melebihi Batas Eksekusi Terkait Sengketa Tanah.” *Jurnal Pengabdian West Science* 02, no. 10 (2023): 905–15.
<https://doi.org/10.58812/jpws.v2i10.676>.
- R.N.N.Manurung, Debora. “Perlindungan Hukum Debitur Terhadap Parate Eksekusi Obyek Jaminan Fidusia.” *Jurnal Ilmu Hukum Legal Opinion* 3, no. 2 (2015): 1–8.
- Setiawan, Gilang, Shailawa Ramb Madani, Brina Saskya Paramita. “Pelaksanaan Eksekusi Riil Terhadap Tanah Dan Bangunan Dalam Penyelesaian Perkara Perdata (Studi Penetapan Ketua Pengadilan Negeri Madiun Kelas 1B Nomor 02 / Pen . Pdt . Eks / 2021 / PN Mad) Shailawa Ramb Madani Lintang Yudhantaka How to Cite : Gilang Se.” *Sultan Jurisprudance: Jurnal Riset Ilmu Hukum* 3, no. 1 (2023): 1–7.
- Sri Hartini, Setiati Widiastuti, dan Iffah Nurhayati. “Eksekusi Putusan Hakim Dalam Sengketa Perdata Di Pengadilan Negeri Semarang.” *Jurnal Civics Volume* 14, no. 2 (2017): 128–38.
<https://doi.org/10.35315/dh.v24i2.9549>.
- Taluke, Asdian. “Eksekusi Terhadap Perkara Perdata Yang Telah Mempunyai Kekuatan Hukum Tetap (Ingkraah) Atas Perintah Hakim Dibawah Pimpinan Ketua Pengadilan Negeri.” *Lex Privatum* 1, no. 4 (2013): 24–35.
<https://ejournal.unsrat.ac.id/index.php/lexprivatum/article/view/3060>.