

POSITION OF LAND EXAMINATION BY JUDGES IN ADMINISTRATIVE COURTS OVER LAND CERTIFICATE DISPUTES

Hasanul Raya Harahap^{1*}, Isnawati², Fatimah Asyhari³, Dina Paramitha Hefni P⁴

^{1,2,3,4}Faculty of Law, University of August 17, 1945 Samarinda, Indonesia
harahapsanulraya@gmail.com^{1*}, isnawati21kaltim@gmail.com², fatimah@untag.smd.ac.id³,
paramitha@untag-smd.ac.id⁴

Received 26 Sep 2025 • Revised 30 Oct 2025 • Published 29 Nov 2025

Abstract

Land certificate disputes are a frequent legal issue in Indonesia, in line with the increasing demand for land, its high economic value, and the position of certificates as legal evidence of ownership rights and the object of state administrative decisions. Various problems such as overlapping certificates, administrative errors, and overlapping authority between the State Administrative Court (PTUN) and the District Court, often give rise to legal uncertainty and have implications for social unrest in society. Therefore, this study focuses on a juridical-normative analysis of the role and authority of PTUN judges in examining and deciding cases related to land certificate disputes. The results show that PTUN judges play a strategic role as testers of the legality of land administration decisions, guarantors of legal certainty, and protectors of community rights through judicial oversight mechanisms. On-site inspections by judges are crucial as an effort to objectify field facts and enforce the principle of legality. This study emphasizes the need for regulatory synergy and increased integrity of the land bureaucracy so that legal protection and substantive justice for land rights are truly realized.

Keywords: PTUN, Land Certificate Dispute, Legal Certainty

INTRODUCTION

Disputes related to land certificates are a frequent legal issue in Indonesia, given that certificates serve as crucial proof of legal ownership. These documents not only serve as the basis for establishing civil rights but also serve as State Administrative Decrees (KTUN) issued by the National Land Agency (BPN) (Nasir, 2024). However, in practice, overlapping certificates or administrative defects often arise, leading to legal disputes between the parties involved. These issues involve both legal uncertainty and socio-economic impacts on the community (Saputra, Silvana, & Marino, 2021).

Land certificate disputes are generally resolved through administrative and judicial channels. In the judicial context, such disputes fall under the jurisdiction of the State Administrative Court (PTUN) if the dispute concerns administrative land decisions, while purely property rights disputes fall under the jurisdiction of the General Courts. However, there is debate and uncertainty regarding the boundaries of authority between the PTUN and the District Court (PN) in examining land certificate disputes (Ramadhan, 2024). Therefore, an analysis of the role of land examinations by judges in resolving these disputes is crucial to ensure legal certainty, effective legal protection, and justice for those seeking justice.

In its role of examining and deciding land certificate disputes, the State Administrative Court (PTUN) must assess the legal validity of state administrative decisions issued by the National Land Agency (BPN). This court does not adjudicate on factual, civil ownership issues, but rather on formal and legal testing of the validity of administrative decisions in issuing certificates (Asmar, 2021). This is in line with the provisions of Article 53 of Law No. 5 of 1986 concerning State Administrative Courts, which mandates the PTUN as the institution authorized to adjudicate state administrative disputes, including land disputes. However, practical conditions indicate overlapping authority, resulting in multiple interpretations by judges and advanced courts, thus creating legal uncertainty.

In addition, judges in land dispute hearings may also conduct on-site inspections to verify the facts on the ground regarding the boundaries, size, and condition of the disputed land. These on-site inspections are part of the judge's authority to make decisions based on objective facts and fundamental formal legal aspects. This authority is crucial given that land certificates often intersect with complex and diverse physical facts on the ground. Case example, Supreme Court Decision Number 421 K/TUN/2016, Object of dispute: Decision to cancel land rights by land officials (KTUN which cancels land rights).

A legal review of the practice of land examination by judges in state administrative courts has not been comprehensively discussed, particularly regarding the mechanisms by which judges examine and assess the legal aspects of land certificate disputes. This study is important as an academic and empirical contribution to clarifying the position of judges in maintaining legal certainty over disputed land certificates. Therefore, this research can also provide input for policymakers in improving regulations and land dispute resolution systems in Indonesia.

This research is also relevant considering the significant increase in land certificate disputes recorded in the Bandar Lampung PTUN SIPP data in October 2024, a 20% increase compared to the previous year (Digna, 2025). This illustrates the increasing complexity of land issues, which continues to grow along with developments in land law and administration. Therefore, a thorough understanding of judges' authority and legal considerations is crucial to avoid multi-interpretable decisions and conflicts of judicial norms.

With this background, the research entitled "The Position of Land Examination by Judges in State Administrative Courts for Land Certificate Disputes" was chosen as an effort to examine in depth the position and role of judges in examining and deciding land certificate disputes at the PTUN, including aspects of authority, fact-checking, and legal considerations.

Land disputes, particularly those related to land certificates, have increased significantly in line with the growing demand for land in both urban and rural areas. This increase in cases has a direct impact on legal certainty and the protection of citizens' civil rights, and has also triggered numerous demands for clarity of authority and effective dispute resolution mechanisms in the courts.

Overlapping certificates, double certificates, and administrative cancellations by land officials have caused significant harm to those seeking justice. The unclear boundaries of authority between the Administrative Court (PTUN), which handles administrative matters, and the General Court, which handles civil matters, complicate the resolution process and often lead to differing decisions on similar disputes. In many cases, judges' decisions in handling land cases also fail to fully provide a sense of substantive justice due to a lack of on-site inspections and a holistic approach to the history of the land.

This research is highly urgent to contribute to the development of ideas and solutions to these issues. A deeper understanding of the role of judges in conducting land inspections and assessing

the legal and administrative aspects of land certificate disputes is not only crucial for the development of legal science but also serves as a basis for recommendations for regulatory reform and the establishment of special agrarian courts, which have been widely proposed by academics and legal practitioners.

Without in-depth research and reform, land disputes risk recurring, placing administrative, economic, and social burdens on the community and government agencies. Therefore, this research not only has implications for resolving positive legal problems, but will further be an important contribution to strengthening the rule of law, land administration governance, and protecting the rights of the Indonesian people to land as a life asset. The PTUN and BPN have the authority to dispute disputes related to: The validity of state administrative decisions, such as the issuance of land title certificates deemed procedurally or substantively flawed. Applications to cancel administratively flawed land certificates can be submitted to the PTUN, not to the material ownership of the land.

Dualism of Court Authority: Many studies highlight the overlapping authority between the District Court (PN) and the PTUN in resolving land disputes, but few have analyzed the concrete impacts and normative solutions to the risk of two conflicting decisions in the same case.

RESEARCH METHOD

Research on the status of land examinations by judges in the State Administrative Court (PTUN) regarding land certificate disputes requires a comprehensive and measurable methodological design. This topic involves dimensions of administrative law, procedural law, and judicial practice, requiring a multi-methodological approach to answer the research questions holistically. This document presents a comprehensive methodological framework relevant to current legal academic literature and research practices at the Indonesian Faculty of Law (Amiruddin & Asikin, 2012).

Type of Research: Normative-Empirical Approach This research uses a mixed method normative-empirical legal research method, which combines (Muhaimin, 2020):

1. Normative Dimension (Legal Research)

Analyzes applicable positive legal aspects:

- a. Law Number 51 of 2009 concerning the Second Amendment to Law Number 5 of 1986 concerning State Administrative Courts
- b. Law Number 5 of 1960 concerning Basic Agrarian Principles (UUPA)
- c. Law Number 24 of 1997 concerning Land Registration
- d. Supreme Court Regulation Number 6 of 2018 concerning Guidelines for Administrative Court Procedures
- e. Joint Decree of the Supreme Court and the National Land Agency concerning Coordination between the Administrative Court and the National Land Agency
- f. Doctrines and theories of administrative law, administrative court procedural law, and the law of evidence

2. Empirical Dimension (Socio-Legal Research)

Explores judicial practices Through:

- a. Study of PTUN decisions regarding land certificate disputes (2015-2024)
- b. In-depth interviews with PTUN judges, advocates, and BPN officials
- c. Observations of PTUN trials with a focus on land inspections
- d. Primary data analysis on decision patterns and the effectiveness of field inspections

Rationale for selecting the method: This topic requires not only a normative analysis (legal regulations) but also an understanding of how judges actually conduct land inspections and their impact on decisions

Utilization of research methods, the legal research steps utilized are juridical-normative research, which emphasizes the study of positive legal norms, statutory regulations, doctrines, legal theories, legal principles, and relevant court decisions. This method is suitable for:

- a. Examining the authority and role of judges in examining land disputes at the PTUN.
- b. Analyze the legal basis, procedures, and considerations of judges in state administrative cases related to land certificates.
- c. Evaluate regulations, jurisprudence, and theories related to the research object in a systematic and analytical manner.

RESULTS AND DISCUSSION

Land inspections conducted by judges (on-site inspections) play a strategic role in the evidentiary system of state administrative courts (PTUN) cases involving land certificate disputes. As stipulated in Article 100 of Law Number 5 of 1986 concerning State Administrative Courts, on-site inspections are a legally recognized form of evidence. These inspections are not merely procedural

formalities, but are essential tools for establishing objective, physically verifiable legal facts in the field.

The importance of these land inspections is growing, given that land certificate disputes generally involve complex factual issues, particularly regarding the consistency between physical data in the field and the legal data recorded in administrative documents. Through on-site inspections of the disputed location, judges gain positive knowledge (positieve kennisneming) of the actual situation that cannot be fully substantiated by written evidence alone.

Land inspections by judges serve two complementary functions. First, from a technical-factual perspective, these inspections aim to obtain a clear, accurate, and documented picture of the physical aspects of the disputed object, including the location, boundaries, area, condition of the land, and the existence of buildings or other uses on the land.

Second, from a normative-juridical perspective, land inspections serve as a mechanism for enforcing the principles of justice, legal certainty, and utility, which are the foundation of State Administrative Law. By presenting objective facts through field inspections, judges can make more solid legal considerations and make decisions more effectively enforceable.

Without a thorough on-site inspection, judges can potentially make decisions that are inconsistent with the actual reality on the ground.

Land inspections allow judges to verify:

1. The accuracy of the measurements and determination of the land area in each certificate;
2. The accuracy of the determination of the land parcel boundaries recorded on the registration map;
3. The conformity between the physical data and the legal data stored at the Land Office;
4. The possibility of procedural errors in the certificate issuance process.

In this way, land inspections become a key instrument in uncovering administrative or legal flaws that are the fundamental causes of overlapping certificates. Binding Power of Land Inspection Results in Decisions The results of on-site inspections, as outlined in the field inspection report, have significant binding force for the panel of judges. Supreme Court jurisprudence has established that if the on-site inspection uncovers facts that differ from the claims in the lawsuit or the defendant's response, but the results are consistent with one of the parties, the judge may use the on-site inspection results as the basis for granting the lawsuit or denying it. Furthermore, the on-site inspection results can also be used by the judge to establish factual data agreed upon by both parties, which then forms the basis for legal considerations and subsequent decisions.

There are several legal theories that are relevant and can be used as a conceptual foundation in research, including "

1. Theory of the Legal State (Rechtsstaat)

This theory emphasizes that every action taken by state officials, including the issuance of land certificates by the National Land Agency (BPN), must be based on applicable legal provisions and implemented in accordance with the principle of legality. The state must guarantee the protection of citizens' rights under the principle of "equality before the law" and legal certainty in every state administrative decision, including the judge's instructions in PTUN trials (Rusli & Anjasmo, 2022).

The relevance of the theory of the rule of law (rechtsstaat) in research on the position of land examinations by judges in the State Administrative Court (PTUN) regarding land certificate disputes is very concrete, because this theory is the foundation in requiring all actions of state officials including the issuance of land certificates by the National Land Agency (BPN) and the handling of disputes by PTUN judges to be in accordance with the law and guarantee the protection of citizens' rights (Saputra, Silvana, & Marino, 2021).

Concretely, the application of the theory of the rule of law in this research is apparent in the following points:

- a. **Legal Certainty:** The rule of law theory requires that all government actions, including the administrative issuance and cancellation of land certificates, must be based on valid laws and procedures. If there are administrative defects or abuses of authority in the issuance of certificates, the public has the legal right to file a lawsuit through the State Administrative Court (PTUN) and have their rights restored by a judge under applicable law.
- b. **Oversight of Official Power: The theory of the rule of law places the actions of public officials under judicial control (court review)** _With the existence of PTUN judges authorized to examine the issuance of land certificates, there is a guarantee that land officials cannot act arbitrarily without a strong and transparent legal basis.
- c. **Rights Protection:** The theory of the rule of law asserts that all citizens receive equal protection before the law ("equality before the law"). Therefore, individuals who are harmed

by land disputes resulting from state administrative decisions are given access to a fair administrative judicial process to obtain justice and certainty about their land rights .

- d. **Legitimacy of Judge's Decisions:** Based on this theory, every PTUN judge's decision is not only an administrative solution, but also an effort by the state to uphold the principles of legal certainty, justice, and protection of citizens' human rights in the land sector.

Thus, the theory of the rule of law becomes the basis and direction of differentiation so that the examination of land disputes at the PTUN is not merely an administrative routine, but a real mechanism to guarantee the supremacy of law and the protection of community rights in concrete practice, not only above the text of regulations.

2. Theory of State Administration

This theory relates to the administrative authority aspect of issuing land certificates, including the norms, procedures, and operational standards of BPN officials. Disputes over government administrative products (land certificates) must be systematically examined through the logic of state administrative law, prioritizing the principles of legality, prudence, and protection of citizens' rights.

3. Legal Protection Theory

The theory of legal protection explains that individuals have the right to receive both preventive and repressive protection against detrimental government actions. In the context of land title disputes, protection is provided through administrative objections, lawsuits to the State Administrative Court (PTUN), mediation, and appeals to higher courts. Judges have a role in testing the accuracy and validity of administrative decisions and rendering fair and effective decisions (Anggita, 2024).

4. Theory of Legal Certainty

This theory asserts that every product of state administration (including land certificates) must have legal certainty both for the certificate holder and other citizens involved in the disputed object. Failure to provide legal certainty will lead to unrest, social conflict, and diminish trust in legal institutions, including the PTUN mechanism (Savana Journal, 2024).

5. Jurisprudential Theory and Judge's Decisions

This theory emphasizes the importance of studying previous judicial decisions (jurisprudence) in strengthening the basis for resolving land disputes at the PTUN. Jurisprudence serves as a normative and prescriptive reference for judges in examining and deciding cases, taking into account best practices and understanding.

Research Results and Discussion

The role of State Administrative Court (PTUN) judges in land certificate disputes is to examine and control the legality of state administrative decisions issued by land administration officials, particularly the National Land Agency (BPN). PTUN judges hold a strategic and independent position, serving to ensure that any issuance, cancellation, or change of land certificates is carried out in accordance with the law, the principle of legality, and the principle of protecting citizens' rights.

Administrative Court judges do not adjudicate land ownership disputes through civil proceedings, but rather have the authority to examine whether the administrative actions of state officials have been carried out correctly, diligently, and without abuse of authority.

Through the inspection process, including on-site inspections, judges can revoke certificates found to be legally or procedurally flawed and order the just restoration of community rights. Therefore, Administrative Court judges are the primary instrument for upholding the rule of law, providing administrative justice, and effectively protecting community rights to land.

This position simultaneously strengthens judicial control over government actions, provides space for substantive justice in the land sector, and guarantees the creation of legal certainty and justice for every justice seeker who is harmed by state administrative decisions in the land sector.

Research has found that the role of judges in the State Administrative Court (PTUN) is strategic in ensuring the validity of state administrative decisions related to the issuance of land certificates. In many cases, lawsuits filed with the PTUN arise from alleged administrative defects such as overlapping, duplicate issuances, or procedural errors by land officials. PTUN judges have absolute authority to examine whether an administrative decision to issue a certificate complies with the law, while disputes over material ownership remain the domain of general courts.

The examination process at the State Administrative Court (PTUN) emphasizes the formal legality of decisions by state administrative officials, including the application of the principles of legality, legal certainty, and the protection of citizens' rights. On-site examinations (*descente*) by judges are still essential to obtain certainty about the object of the case and to bridge administrative data with empirical facts on the ground. Various PTUN decisions indicate that certificate cancellation can be carried out if material or formal administrative defects are found, and judges' decisions often

simultaneously order the revocation or cancellation of certificates—emphasizing the judicial function as a corrector of state administrative mechanisms.

The factors causing disputes generally stem from weak land administration, minimal public outreach, and a lack of due diligence in data verification prior to certificate issuance. In making their considerations, PTUN judges are required to refer to the theory of the rule of law, the theory of state administration, and the theory of legal protection to realize the supremacy of law and provide maximum protection to those whose rights have been violated.

The study also noted the need for synergy and clear boundaries between the authority of the PTUN and the General Court so that access to justice becomes more effective without overlapping forums, including the urgency of firm technical regulations regarding strengthening the execution of PTUN decisions related to land.

From the series of discussions above, the author provides recommendations for the problems in this research, namely:

1. **Strengthening Technical Regulations:** The government needs to formulate more detailed regulations regarding the procedures for issuing, canceling, and supervising the administration of land certificates in order to minimize overlaps and administrative legal defects.
2. **Optimization of On-Site Inspections:** PTUN judges are encouraged to conduct on-site inspections more frequently to obtain objective facts about the disputed land and prevent controversial decisions.
3. **Improving the Capacity of Civil Servants:** Regular training for land officials and state administrative officials is essential to ensure that certificate issuance is in accordance with the principles of legality and administrative prudence.
4. **Publication of Jurisprudence:** The Supreme Court and the Administrative Court need to increase public access to jurisprudence and important decisions, so that they become a reference for legal education and strengthen the certainty of norms.
5. **Collaborative Approach:** Synergy is needed between the BPN, PTUN, and general courts to clarify and socialize the pathways, competencies, and procedures for handling land disputes.
6. **Proactive Legal Protection:** There needs to be a mediation and complaint mechanism outside the court as a preventive measure before the public takes the litigation route.

Implications for Legal Certainty of Land Right Land examinations by judges make a real contribution to achieving legal certainty in the registration and certification of land rights. However, this legal certainty can only be fully achieved if the entire system from normative regulations, examinations, decision-making, to the execution stage operates effectively and consistently.

Asymmetry between various levels of the judiciary (PTUN, PTTUN, and the Supreme Court) in interpreting the facts resulting from local examinations can lead to legal uncertainty that is detrimental to the parties. Therefore, consistency in the application of laws and uniform examination methodologies is needed throughout the PTUN.

CONCLUSION

This study highlights the importance of applying various theories, such as the theory of the rule of law (*rechtsstaat*), the theory of state administration, the theory of legal protection, the theory of legal certainty, as well as the theory of jurisprudence and judges' decisions, as a conceptual basis in resolving land certificate disputes in the State Administrative Court (PTUN). The actions of land officials in issuing land certificates must be fully subject to applicable law and carried out in a transparent, fair, and responsible manner, so that citizens' rights to land are guaranteed protection through the supervision and adjudication mechanisms in the PTUN.

The role of PTUN judges in land certificate disputes plays a strategic role in ensuring the validity of administrative decisions, guaranteeing legal certainty, and serving as an instrument for protecting the rights and substantive justice of the community. PTUN judges have the authority to review and annul administratively flawed decisions and order the cancellation of certificates if violations of good governance principles, such as legality, prudence, and legal certainty, are found. On-site inspections by judges serve as an important indicator to ensure that field facts and administrative data are truly verified.

The main factors causing disputes include weak land administration, lack of coordination and outreach to the community, and minimal data verification before issuing certificates, which gives rise to doubts, multiple disputes, and overlapping rights.

This research also highlights the need for effective synergy between the State Administrative Court (PTUN), the National Land Agency (BPN), and the general courts to ensure more effective, transparent, and seamless access to justice, ensuring the resolution of disputes, the publication of jurisprudence, and the elimination of overlapping forums. Therefore, the land inspection process by

PTUN judges is not merely an administrative routine, but rather a concrete mechanism for upholding the rule of law and protecting community rights in land practices in Indonesia.

This conclusion emphasizes the urgency of reforming the land bureaucracy system, strengthening the judicial examination mechanism, and providing substantial legal certainty in protecting land rights in Indonesia. This study concludes that the position of land examination by judges in the State Administrative Court (PTUN) is very strategic in ensuring the validity of state administrative decisions related to the issuance of land certificates and the protection of citizens' rights.

Core Conclusion

1. The application of the theory of the rule of law (*rechtsstaat*), the theory of state administration, the theory of legal protection, legal certainty, and the theory of jurisprudence are important foundations in handling land certificate disputes at the PTUN.
2. Land inspections by PTUN judges ensure that every administrative decision, including the issuance and cancellation of certificates, is made on the basis of law, the principle of legality, and the protection of community rights (Fitriani, 2021).
3. PTUN judges have a corrective role to overturn administratively flawed decisions and protect citizens' substantial rights, with local examinations strengthening the integrity and validity of decisions.
4. Weak land administration, lack of coordination between institutions, and minimal data verification often lead to multiple disputes and overlapping rights (Pratiwi, 2020).
5. Synergy between the PTUN, BPN, and general courts is essential to ensure that substantive justice is achieved and all legal protection efforts are effective and transparent.

ACKNOWLEDGMENTS

The author of this research is very grateful for the support of the lecturers, Mrs. Dr. Isnawati, SH., MH, Mrs. Fatimah Asyhari, and Mrs. Dina Paramitha Hefni Putri SH., MH who have guided, until this research is completed. Fellow students of the Faculty of Law Class of 2022, thank you for your support and encouragement, until this writing is completed.

REFERENCES

- Amiruddin & Asikin, Z. (2012). *Pengantar metode penelitian hukum*. PT. Raja Grafindo Persada.
- Anggita. (2024). *Penyelesaian sengketa konflik kepemilikan tanah dengan pendekatan litigasi di Pengadilan Tata Usaha Negara*. Savana: Indonesian Journal of Natural Resources and Environmental Law, 1(01), 24–38.
- Asmar, A. (2021). *Pertimbangan hakim Tata Usaha Negara dalam pembatalan sertifikat hak atas tanah yang dibebani hak tanggungan (Analisis Putusan No.43/G/2019/PTUN.PDG dan Putusan No.44/G/2019/PTUN.PLG)*. Jurnal Swara Justisia, 5(2), 103–116. <https://doi.org/10.31933/ujsj.v5i2>
- Digna, F. C. (2025). *Penyelesaian sengketa sertifikat ganda melalui Pengadilan Tata Usaha Negara Bandar Lampung (Studi kasus putusan nomor: 22/G/2021/PTUN-BL)* [Skripsi tidak dipublikasikan]. Universitas Lampung.
- Ferawati, S., & Kartabrata, F. R. (t.t.). *Karakterisasi yurisprudensi No. 154 PK/TUN/2010: Kaidah hukum pembagian kompetensi absolut sengketa pertanahan*. Komisi Yudisial Republik Indonesia. Diperoleh dari <https://karakterisasi.komisiyudisial.go.id/>
- Fitriani, D. E. (2021). *Pembatalan sertifikat hak atas tanah negara milik perusahaan umum Jasa Tirta 1 (Studi Putusan PTUN Surabaya No.83/G/2014)* [Skripsi tidak dipublikasikan]. Universitas Islam Negeri Maulana Malik Ibrahim Malang.
- Kedudukan sertifikat hak atas tanah sebagai alat bukti dalam penyelesaian permasalahan sengketa tanah berdasarkan perspektif hukum positif Indonesia. (2021). Jurnal Ilmu Hukum, 4(2), 201–213. Diperoleh dari [tautan mencurigakan telah dihapus]
- Muhaimin. (2020). *Metode penelitian hukum*. Mataram University Press.
- Nasir, S. M. (2024). *Tinjauan yuridis terhadap sertifikat hak atas tanah ganda (overlapping) di Badan Pertanahan Nasional Kabupaten Gorontalo*. Jurnal Eksekusi, 2(4), 301–311. <https://doi.org/10.55606/eksekusi.v2i4.1544>
- Pratiwi, H. E. (2020). *Perlindungan hukum terhadap pembatalan sertifikat hak atas tanah oleh Kantor Pertanahan*. Savana: Jurnal Hukum, 2(1), 26–36. <https://journal.fhukum.uniku.ac.id/savana/article/download/30/19/74>
- Pujiningrum, W. (t.t.). *Peran yurisprudensi dalam perkara sengketa hak atas tanah [Makalah]*. Kepaniteraan Mahkamah Agung Republik Indonesia. Diperoleh dari <https://kepaniteraan.mahkamahagung.go.id/images/artikel/Makalah%20peran%20yurisprudens>

i_wigati.pdf

- Ramadhan, A. A. (2024). Sengketa kompetensi absolut Pengadilan Negeri dan Pengadilan Tata Usaha Negara terkait dengan perkara sengketa pertanahan. *Journal of Mandalika Literature*, 6(1), 264–278. <http://ojs.cahayamandalika.com/index.php/jml/article/download/3993/3114/>
- Rusli, T., & Anasmoro, D. (2022). Analisis hukum penyelesaian sengketa pembatalan sertifikat tanah melalui jalur litigasi PTUN (Studi Putusan Nomor: 22/G/2020/PTUN-BL). *Humani (Hukum dan Masyarakat Madani)*, 12(2), 328–346.
- Saputra, R. A., Silvana, S., & Marino, E. F. (2021). Penyelesaian sengketa sertifikat tanah ganda serta bentuk kepastian hukumnya. *Jurnal Jentera*, 4(2), 555–573. <https://jurnal.jentera.ac.id/index.php/jentera/article/download/40/26/254>