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THE EFFECTIVENESS OF VERZET LEGAL REMEDIES IN PROTECTING THE DEFENDANT'S RIGHTS AGAINST A VERDICT OF VERSTEK AFTER PERMA NUMBER 7 OF 2022

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ABSTRACT

The implementation of the principles of speedy, simple, and low cost justice in civil cases is often hampered by administrative obstacles, especially in the process of summoning the parties. Responding to these problems, the Supreme Court issued Supreme Court Regulation (PERMA) Number 7 Year 2022 as a form of digital transformation of the judiciary, which replaces most conventional processes with an electronic system (e-Court). This research examines the effectiveness of the verzet legal remedy in protecting the defendant's rights against a verdict after the implementation of the PERMA. The focus of the discussion includes changes in the summoning mechanism, its impact on the verstek verdict, and the extent to which the e-Court system is able to contribute to access to justice. Although electronic summons provides efficiency and legal certainty, there are challenges faced by defendants, such as technological limitations, digital literacy, and various other technical obstacles that have the potential to reduce the effectiveness of verzet as an instrument of legal protection. It is important to ensure that the e-Court system is truly inclusive, easily accessible, and accompanied by adequate socialization so that the rights of the defendants are protected fairly and proportionally in the modern judicial process.

Keywords: *Verzet; Verstek Decision; Electronic Court System; Access to Justice.*

ABSTRAK

Penerapan asas peradilan cepat, sederhana, dan biaya ringan dalam perkara perdata kerap kali terkendala kendala administratif, khususnya dalam proses pemanggilan para pihak. Menanggapi permasalahan tersebut, Mahkamah Agung menerbitkan Peraturan Mahkamah Agung (PERMA) Nomor 7 Tahun

2022 sebagai salah satu bentuk transformasi digital peradilan yang menggantikan sebagian besar proses konvensional dengan sistem elektronik (e-Court). Penelitian ini mengkaji efektivitas upaya hukum verzet dalam melindungi hak-hak tergugat terhadap putusan verzet pascaberlakunya PERMA. Fokus pembahasan meliputi perubahan mekanisme pemanggilan, dampaknya terhadap putusan, dan sejauh mana sistem e-Court mampu memberikan kontribusi terhadap akses keadilan. Meskipun pemanggilan secara elektronik memberikan efisiensi dan kepastian hukum, namun terdapat tantangan yang dihadapi oleh tergugat, seperti keterbatasan teknologi, literasi digital, dan berbagai kendala teknis lainnya yang berpotensi mengurangi efektivitas verzet sebagai instrumen perlindungan hukum. Penting untuk memastikan bahwa sistem e-Court benar-benar inklusif, mudah diakses, dan disertai dengan sosialisasi yang memadai sehingga hak-hak responden dilindungi secara adil dan proporsional dalam proses peradilan modern.

Kata kunci: Verzet; Putusan Verstek; Sistem Pengadilan Elektronik; Akses terhadap Keadilan.

INTRODUCTION

In Indonesia's civil justice system, case resolution is based on the principles of speed, simplicity and low cost, as stipulated in Article 2 paragraph (4) of Law No. 48/2009 on Judicial Power. This principle emphasizes that the judiciary must be able to provide efficient access to justice without compromising the rights of the litigants. However, the implementation of this principle often experiences obstacles, especially in administrative aspects such as summoning the parties. The development of technology and information encourages the ease of the judicial process, especially in the aspect of examination and settlement of cases, in order to realize the principle of fast, simple and low cost justice.

The Supreme Court as the highest institution holding judicial power has updated the administration and trial process with the enactment of Supreme Court Regulation Number 3 of 2018 on Case Administration in Courts Electronically. The regulation has undergone development with the enactment of Supreme Court Regulation Number 1 of 2019 concerning Case Administration and Trial in Court Electronically, which has been amended by Supreme Court Regulation Number 7 of 2022¹

One of the problems that often arise in the practice of civil justice is the obstacles in the summons carried out by the bailiff. Summons must meet the proper and feasible requirements, as stipulated in Article 390 RBg and Article

122 HIR. An invalid summons can have implications for procedural defects and have an impact on the validity of the decision. However, in practice, the implementation of summons often experiences obstacles, such as difficulty in finding the address of the summoned party, objections from the party concerned, or technical obstacles in delivering the summons. This can have an impact on the defendant's absence from the trial, which ultimately leads to a verdict of *verstek*.

A *verstek* verdict is a verdict rendered by a judge without the presence of the defendant in court, as stipulated in Article 125 HIR and Article 149 RBg¹. To provide protection for defendants who feel aggrieved by a *verstek* verdict, the civil procedure law provides a legal remedy of *verzet*, which is an opposition to the verdict so that it can be re-examined at trial. However, the effectiveness of the *verzet* remedy is often questioned, given the many cases where the defendant is unaware of the trial due to ineffective summons. Verdicts are imposed not without reason, but with the aim that the parties can comply with judicial order, so that during the judicial process, case settlement can be avoided from the arbitrariness of law enforcement officials.²

In response to this problem, the Supreme Court issued Supreme Court Regulation (PERMA) Number 7 of 2022 concerning Amendments to Supreme Court Regulation Number 1 of 2019 concerning Electronic Case Administration and Court Proceedings. This PERMA is a form of transformation in the method of summoning parties in civil cases, by providing a more modern electronic summoning mechanism and can increase the effectiveness of delivering information to the parties. With the issuance of the PERMA, the public can get convenience when undergoing the case settlement process, because all procedures that are usually carried out through conventional channels can be done online with the use of *e-Court*. With this change, there will certainly be implications for the *verstek* verdict and the *verzet* legal remedy filed by the defendant.

This research will examine the effectiveness of the *verzet* legal remedy in protecting the defendant's rights against a *verstek* verdict after the enactment

¹ Ristanto, Adhi Yudha, Ruslan Renggong, and Basri Oner, 'LEGAL MEASURES AGAINST VERSTEEK DECISIONS AFTER PERMA NOMOR 7 YEAR 2022', *Indonesian Journal of Legality of Law*, 6.2 (2024), pp. 213-16, doi:10.35965/ijlf.v6i2.4470.

² Harahap, M. Yahya, 2015. *Civil Procedure Law on Lawsuits, Trials, Seizures, Evidence, and Court Decisions*. Jakarta: Sinar Grafika.

of PERMA Number 7 of 2022. The discussion will focus on how this regulatory change affects the summoning mechanism, its impact on *verstek* decisions, and the extent to which it improves justice for litigants in the civil justice system in Indonesia. Since the issuance of PERMA No. 7 of 2022, the civil justice system in Indonesia has undergone changes with the implementation of electronic case and trial administration. One of the impacts of this regulation is a change in the mechanism for summoning the defendant and the application of a *verstek* decision, which in turn affects the effectiveness of *verzet* as a legal remedy against a *verstek* decision.

Prior to this PERMA, many defendants did not appear in court because they did not receive the summons clearly or were located far from the court, so a verdict of verdict was often handed down. Now, with the *e-Court* system, summonses can be made electronically, so the reasons for the defendant's absence should be reduced. In practice, there are still a number of challenges ranging from whether electronic summonses are really effective or whether defendants actually experience difficulties in accessing the court and whether *verzet* is still an effective instrument after the digitization of the judiciary. Overall, the court integrated the principles of civil procedural law in the *verzet* with the technological convenience of the *e-court*, so that the *verzet* process becomes more efficient, transparent, and still guarantees the rights of the parties to obtain a fair and comprehensive hearing.

Although digitalization offers various conveniences, new challenges also arise, such as the effectiveness of electronic summons delivery, the digital literacy gap in the community, and limited access to information technology. These problems raise important questions: is electronic summons really effective in ensuring the presence of the defendant, and is *verzet* still an effective legal remedy in protecting the defendant's rights amid the transformation of the digital justice system? This paper will discuss in depth the effectiveness of *verzet* legal remedies after the enactment of PERMA Number 7 of 2022, especially in providing fair legal protection for defendants against *verdicts* in the digital era.

RESEARCH METHODS

This research uses the normative juridical method, which is an approach that focuses on analyzing written legal norms, such as legislation, doctrine,

and court decisions that are relevant to the legal issues under study.³ The approach used is a statute approach, by systematically examining the regulations governing party summons, verdicts, and verzet legal remedies in the electronic justice system. The legal materials used include primary (regulations and decisions), secondary (literature and journals), and tertiary (legal dictionaries). The data was analyzed descriptively-analytically, by describing the applicable norms and evaluating the effectiveness of their application in practice.⁴

RESULTS AND DISCUSSION

The Effect of PERMA Number 7 Year 2022 on the Verstek Decision Mechanism and Verzet Legal Remedies

Verstek is a decision rendered by a judge if the defendant does not appear in court without a valid reason after being properly and legally summoned. The verstek mechanism is regulated in Article 125 HIR and Article 149 RBg. With the development of technology and modernization of the administration of justice, the Supreme Court issued PERMA No. 7 of 2022 concerning Administration and Trial of Civil Cases in Courts Electronically, in which the regulation provides for the expansion of the use of the *e-court* system which accommodates electronic summons and notifications.

The enactment of PERMA Number 7 of 2022 on the mechanism of verstek decisions and verzet legal remedies has a very significant effect in updating the procedures for case administration and electronic trials. The PERMA stipulates that in the event that the defendant files a legal challenge in the form of a verzet against the verstek decision, and the plaintiff files an appeal simultaneously, the appeal filed by the plaintiff is declared waived. In conclusion, the filing of a verzet by the defendant closes the plaintiff's right to continue to appeal the verstek decision.⁵ The enactment of the PERMA confirms that the protection of the defendant's right to file a verzet, results in the verstek decision that has been issued by the Panel of Judges becoming raw

³ Diantha, I Made Pasek, 2017. *Normative Legal Research Methodology in Justifying Legal Theory*, ed. by Witnasari. Jakarta: Prenada Media Group

⁴ Soekanto, Soerjono, and Sri Mamudji, 2010. *Normative Legal Research: A Brief Overview*, 1st edn. Jakarta: RajaGrafindo Persada.

⁵ Ristanto, Adhi Yudha, Ruslan Renggong, and Basri Oner, 'LEGAL MEASURES AGAINST VERSTEK DECISIONS AFTER PERMA NOMOR 7 YEAR 2022', *Indonesian Journal of Legality of Law*, 6.2 (2024), pp. 213-16, doi:10.35965/ijlf.v6i2.4470.

again, and it is necessary to carry out a comprehensive re-examination mechanism at the first level court. The plaintiff still has the same right as the defendant to file an appeal if no *verzet* legal remedy is filed or after the *verzet* decision. PERMA No. 7 of 2022 accommodates the implementation of trials and case administration electronically, which then accelerates and facilitates the process of case settlement including appeals and *verzet*.

The implementation of PERMA No. 7 Year 2022 has an important impact on the mechanism of verdict *verstek* in the settlement of civil cases. Based on Article 4 paragraph (2) of the PERMA, the summoning of parties who have registered in the *e-Court* system can be done through the electronic judicial information system. If the defendant has registered through *e-Court*, then the summons sent through the user's official account is considered valid and can be a sufficient basis for the court to issue a verdict of *verstek* if the defendant fails to appear without a valid reason. The implementation of electronic summons produces an electronic receipt which is regulated in Article 5 paragraphs (3) and (4), the electronic summons also becomes evidence that the summons has been properly made. The existence of digital evidence replaces the role of physical summons which has been a formal requirement for summons in civil procedure law. The meaning of "legally summoned" has expanded, which was previously limited to manual summons by bailiffs appointed by the President of the District Court. The *e-Court* system makes it easier to send notifications to the parties, which will be sent electronically to the registered official account, and automatically considered as a valid summons in accordance with civil procedure law.

In addition to affecting verdicts, PERMA Number 7 Year 2022 has a direct impact on the implementation of *verzet* legal remedies. The electronic system becomes the new basis for calculating the grace period for filing a *verzet* appeal. Based on Article 129 HIR,⁶ a *verzet* can be filed within 14 days from the notification of the *verstek* verdict. With the enactment of the PERMA, notification is done electronically, and the notification date recorded in *e-Court* becomes the initial reference for calculating the time for filing a *verzet*. In practice, this system certainly provides convenience for the litigants, but of

⁶ Djais, Moch, and Koosmargono, 2010. *Reading and Understanding HIR*. Semarang: Diponegoro University Publishing House.

course there are challenges to access to justice, especially for parties who are not accustomed to using technology or the *e-Court* system, which certainly risks losing their right to file a *verzet*, which potentially violates the principle of *audi et alteram partem*, namely the right to be heard before a decision is rendered.

The use of an electronic system in the *verzet* process increases transparency and accountability. All steps in the verification process, from uploading documents to system acceptance, are digitally recorded and verifiable. This strengthens administrative accuracy and minimizes the risk of abuse of judicial procedures. The purpose of issuing PERMA No. 7 of 2022 is basically to simplify the process for parties seeking justice. As is the principle in the settlement of civil cases which adheres to the principles of simplicity, speed and low cost.

The court handles *verzet* applications in the *e-Court* system with a procedure that combines conventional *verzet* legal mechanisms and the convenience of digital technology. If the defendant wishes to file a *verzet*, they can do so through the *e-Court* system online without having to physically appear in court. For the process to run smoothly, all litigants must agree to proceed electronically. After the *verzet* is filed, the *verzet* case is examined using the usual procedure applicable to civil proceedings, just like the examination of a lawsuit in general. *Verzet* is not a new case, but a continuation of the main case with the defendant as the opponent and the plaintiff as the opponent. The letter of opposition to the *verzet* is considered as the defendant's answer to the plaintiff's lawsuit, so that the examination is again carried out thoroughly on the subject matter.

The filing of a *verzet* delays the execution of a verdict, unless the verdict is declared enforceable despite a *verzet* appeal. If the verdict of *verstek* is granted after the *verzet*, the subsequent *verzet* is not accepted.⁷ *Verzet* cases and *verstek* cases are still registered under the same case number, and ideally handled by the same panel of judges who handed down the *verstek* verdict. Digitization through e-courts speeds up administrative processes, facilitates access for parties, and reduces geographical barriers. Case documents and

⁷ Nugroho, Ferdiansyah, and Niru Anita Sinaga, 'Lex Laguens: A Journal of Legal Studies and Justice', 3 (2025), pp. 188-203 <<https://jurnal.dokterlaw.com/index.php/lexlaguens>>.

data can be accessed online, thus facilitating coordination between the court and the parties.

Effectiveness of Verzet in Electronic Court System

The implementation of the electronic court system with the issuance of PERMA Number 7 of 2022 has a significant impact on various civil case settlement processes, without exception to the implementation of verzet as an opposition to a verstek decision. Verzet is a legal remedy or challenge to a verdict of verstek which aims to have the verdict re-examined in depth, so that the verdict of verstek can be canceled and the plaintiff's claim rejected.⁸ Verzet is not a new case, because it is a continuation of the same case, where the defendant who files a verzet has the position of the defendant, and the plaintiff has the position of the opposing party in a re-examination. The legal remedy of verzet is regulated in Article 129 HIR which emphasizes that only the defendant has the right to file a legal remedy *of verzet*⁹ The effectiveness of the verzet mechanism is very important to ensure that the principles of justice and *due process of law* are maintained.

After the enactment of PERMA Number 7 Year 2022, the effectiveness of the verzet is highly dependent on the defendant's understanding and ability to use and access the *e-Court* system. The ease of access actually becomes a challenge, especially for parties who have minimal or no digital literacy or cannot have stable internet access. Although a proper summons through electronic notification remains valid, its effectiveness is highly dependent on the notification received by the respondent through the registered official account. In this case, there is a risk that the defendant does not open or understand the notification he/she received, which certainly causes a high delay or failure to file a verzet, which has an impact on the right to defense of the defendant.

In the electronic system, the date of digital notification of the verdict becomes the basis for calculating the time period for filing a verzet. As stipulated in Article 129 HIR, the time period for filing a valid verzet is 14

⁸ Sitorus, Syahrul, 2018. *LEGAL EXERCISES IN A civil case (Verzet, Appeal, Cassation, Judicial Review and Derden Verzet*.

⁹ Maskanah, Ummi, *CHALLENGES IN THE REVISION OF THE JUDICIAL SYSTEM THROUGH THE DEVELOPMENT OF TECHNOLOGY: E-COURT AND E-LITIGATION AS A MEANS TO ADVANCE MODERN JUSTICE IN INDONESIA* (Online, 2023), ¹ <<https://jurnal.unsur.ac.id/jmj>>.

working days after the notification of the *verstek* verdict is legally made. Although the mechanism for granting the time period through electronic notification supports efficiency and legal certainty, there is still a need to guarantee that the court information system really works optimally, and there are no errors from the system that hamper the defendant's right to know the contents of the decision. Although in practice the electronic court system presents challenges, particularly in terms of efficiency and legal certainty, the electronic court system also presents advantages in the implementation of *verzet*. The entire process of filing a *verzet*, from uploading documents, recording time, to sending proof of opposition, is recorded in the system and can be audited. This allows for better supervision and minimizes maladministration practices such as missing documents or date manipulation.

The effectiveness of *verzet* enforcement in the electronic court system has shown a number of positive developments as well as challenges. One of the main advantages is the ease of access and acceleration of the process. Through the *e-Court* system, the defendant can file a *verzet* online without being physically present at the court, thus speeding up the filing process and allowing cases that were originally decided by *verstek* to be re-examined efficiently. The *verzet* mechanism still guarantees the protection of the defendant's right to obtain a fair hearing. When a *verzet* is filed, the *verstek* decision becomes unenforceable and the case will be re-examined from the beginning by the court of first instance, ensuring the principle of *audi et alteram partem* is met.

PERMA Number 7 Year 2022 provides a clear legal basis for the procedure for implementing *verzet* in the electronic system. One of its provisions states that if the defendant has filed a *verzet*, then the plaintiff cannot appeal the verdict, because the re-examination process has already taken place through *verzet*. This confirms that the *verzet* is the primary legal remedy that must be pursued before the appeal route is used. Nonetheless, the effectiveness of *verzet* in practice still faces technical and social barriers. Limited access to technological devices, uneven internet networks, and low digital literacy, especially in remote areas or communities with economic limitations, are real challenges in implementing this system. The digitization of *verzet* also contributes to the strengthening of the principles of simple, fast and low-cost justice. This is in line with the main objective of the *e-Court* system, which is to realize a more efficient, transparent and affordable judicial

process for the wider community. Although it still faces a number of obstacles, the implementation of *verzet* in the electronic court system is a step forward in the reform of civil procedural law in Indonesia.

Obstacles faced by the Defendant in filing a *Verzet* after the Digitalization of the Judiciary

The digitization of the judicial system through *e-Court* has facilitated the accessibility of all legal procedures, but it cannot be denied that defendants face various obstacles when filing a *verzet* against a verdict. The main obstacle faced is limited access to technology and infrastructure, especially in areas that are not covered by the internet network or lack of technological devices. Many courts and communities are not fully prepared, both in terms of human resources and facilities, to operate the *e-Court* system effectively.¹⁰ The low level of digital literacy and legal knowledge among the community is a significant barrier. The lack of information on the technical procedures for filing a *verzet* electronically deprives the defendant of the opportunity to exercise their right to file a legal remedy to the fullest.

The use of electronic systems in the delivery of copies of decisions creates legal uncertainty, especially in determining the beginning of the grace period for filing a *verzet*. Although Article 129 HIR has set a time limit of 14 days from the notification of the decision, in *e-Court* practice the date of electronic notification becomes the basis for calculation, often causing confusion for defendants who are not accustomed to using digital mechanisms¹¹. In the context of filing a *verzet*, many defendants are not accompanied by legal counsel, which will certainly be difficult due to the lack of technical assistance and practical guidance on the use of the *e-Court* system, making it difficult for defendants to optimally utilize the right to *verzet* ¹². This constraint is a serious problem because to file a *verzet* through *e-Court*,

¹⁰ Maskanah, Umami, *CHALLENGES IN THE REVISION OF THE JUDICIAL SYSTEM THROUGH THE DEVELOPMENT OF TECHNOLOGY: E-COURT AND E-LITIGATION AS A MEANS TO ADVANCE MODERN JUSTICE IN INDONESIA* (Online, 2023), 1 <<https://jurnal.unsur.ac.id/jmj>>.

¹¹ Pancarani, Denov, Donna O Setiabudhi, and Ronald Elrik Rorie, *E-COURT APPLICATION IN INDONESIA'S TRADITIONAL JUDICIAL SYSTEM 1*, 2024 <<https://id.linkedin.com/pulse/ma-terbitkan-perma-7-tahun->>

¹² Pertiwi Tontowi Puteri Gina Sabrina Muhammad Rizaldi Warneri Arsa Ilmi Budiarti Andi Nur Ilman Fatin Yumna, Bunga, *Legal Aid Information Disclosure for Wider Access to Justice: A Study of Online Portals Providing Legal Aid Information* © 2023, 2023

the defendant needs to have a registered user account, which is generally owned by advocates only. Defendants who are not accompanied by an advocate are given the opportunity to use legal aid facilities. At in reality, not all defendants are aware of and can access legal aid services quickly.¹³

Electronic summons through email or notification on the *e-Court* account is considered valid, but in practice, the defendant often does not realize that he/she has received an official summons from the court. From inactive emails, unreadable by the defendant, to the defendant's lack of awareness to check their email regularly, the defendant was unable to attend the trial and only found out about the verdict after the verdict was pronounced. In the 2022 Annual Report of the Supreme Court, it was mentioned that there were technical problems ranging from unresponsive systems, difficulties in uploading documents, to delays in notifications from the system.

Social and cultural aspects also play a role as another challenge in the transition to a digital justice system. Some people are still skeptical about the validity of electronic legal processes, and continue to trust the physical and direct nature of the conventional justice system. This can reduce the trust and participation of defendants in carrying out legal processes digitally, including in filing a *verzet*. To ensure the protection of defendants' rights in the era of judicial digitalization, it is necessary to increase digital legal literacy, expand technological infrastructure, and provide equitable legal and technical assistance throughout Indonesia. The lack of clarity regarding the possibility of filing a *verzet* manually has caused confusion at the practical level. Although in practice some courts may still accept manual *verzet*, there is no clear guidance in PERMA No. 7 of 2022 regarding this procedure, creating legal uncertainty for the defendant.

With these obstacles, it appears that while judicial digitization has brought advances in efficiency and transparency, without the support of digital legal literacy, equitable infrastructure, and inclusive operational guidelines, access to justice for defendants in filing a *verzet* is hampered.

¹³ Nugroho, Ferdiansyah, and Niru Anita Sinaga, 'Lex Laguens: A Journal of Legal Studies and Justice', 3 (2025), pp. 188-203 <<https://jurnal.dokterlaw.com/index.php/lexlaguens>>.

CONCLUSION

1. The digitalization of the judiciary through the implementation of *e-Court* and PERMA Number 7 Year 2022 is a form of step forward in realizing the principles of fast, simple and low cost justice. In practice, the implementation of the *e-Court* system has left various challenges, especially in terms of the effectiveness of electronic summoning of defendants. Although normatively the electronic summons is considered valid, in practice many defendants do not understand the mechanism, or experience technical and administrative constraints, so that they cannot attend the trial so that it is decided by verdict. These conditions have a direct impact on the effectiveness of the *verzet* legal remedy, which is a mechanism to protect the rights of the defendant, which should provide an opportunity for a fair re-examination. Although the digital system provides efficiency compared to the conventional system, there needs to be awareness of the possibility of marginalized access to justice for parties who are less technologically proficient, because they do not get full information.
2. In facing the challenges of electronic court implementation, strategic efforts are needed so that digitalization does not hamper access to justice. One important step that must be taken is to increase the socialization and education of the *e-Court* system, especially for ordinary people and parties who are not accompanied by legal counsel. An understanding of digital procedures, including the electronic summoning mechanism and the right to file a *verzet* given to the defendant is very important, so that the rights of the parties remain protected during the judicial process. Judicial institutions need to ensure that the electronic summons process is carried out in an accountable, transparent manner and with due regard to easy accessibility for the parties concerned. Manual summons can be an alternative option to avoid potential information gaps that can harm the defendant. Periodic evaluation of the implementation of PERMA No. 7 of 2022 is needed to assess the extent to which this regulation contributes to the effectiveness of *verzet* legal efforts. This evaluation is the basis for improving the electronic justice system so that it adheres to the principles of justice, legal certainty and legal expediency in civil justice practice in Indonesia.

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