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Violation of The Law in The Case of Divorce Verstek

Muzakir¹, Imam Yazid², Nurcahaya³

¹North Sumatra State Islamic University, Indonesia. E-mail: muzakir.adan@gmail.com

²North Sumatra State Islamic University, Indonesia. E-mail: imam.yazid@uinsu.ac.id

³North Sumatra State Islamic University, Indonesia. E-mail: nurcahaya@uinsu.ac.id

Abstract

The research aims to answer the problem of legal violations in verstek divorce cases. This research is an empirical legal research with a qualitative approach, and data collection in this research uses observation, interview, and data analysis techniques. This research found that in verstek divorce cases, violations of the law can occur if there are violations of procedures or rights guaranteed by law in the divorce process. The following are some examples of legal violations that may occur in verstek divorce cases, namely violation of the rights of absent parties, non-compliance with procedural requirements, violation of the rights of absent parties in the decision, fraud or manipulation in the divorce process. Forms of violation of taklik talak which are used as reasons for filing for divorce, among others, leaving the wife for 2 consecutive years, not providing mandatory maintenance for 3 months, hurting the wife's body / body or, neglecting or not caring for the wife for 6 months or more.

Keywords: *Violations Law, Divorce, Verstek*

INTRODUCTION

Lawlessness is an act or behavior that violates or does not comply with the applicable law in a jurisdiction. This means violating the rules and norms established by law to maintain order, justice, and security in society. Lawlessness can include various types of actions, such as theft, fraud, physical violence, traffic violations, breach of contract, or violation of individual rights. In addition, unlawful acts or behaviors can also relate to administrative, environmental, tax, or other areas of law that pertain to daily activities and life. Violations of the law can have legal consequences, including criminal prosecution, financial penalties, or civil suits. The purpose of enforcing the law is to maintain justice, protect the rights of individuals, and prevent actions that harm society. There are many types of legal violations that occur, one of which is legal violations in divorce cases.

Marriage is the handover or also known as the legal *ijab Kabul* contract between a man and a woman in order to achieve the purpose of life in accordance with the established Sharia law¹. Marriage is a noble and holy covenant between a man and a woman which legalizes sexual relations with the aim of nurturing an affection, benevolent and supporting family. A family like this is the ideal that everyone dreams of². In marriage, two individuals who have known each other are united so that the household can run well³. When a couple are getting married, other couples, friends and family congratulate them by saying the phrases *sakinah, mawaddah, wa rahmah* (peace, love and compassion). They wish the couple a peaceful, loving and affectionate marriage). However, men can only propose, while God imposes. The goal of a happy marriage is not always achievable. A supposedly harmonious household can end up being a disaster. This is a test for a married couple to face. If they manage to get through it, their household will last. In contrast, those who fail to deal with it will reach a dead end and usually end up divorcing⁴.

A divorce takes place when a husband releases his marital bond with his wife by filing a divorce application to the court and issuing a statement of a Divorce Pledge before a court hearing if the application is granted by the judge⁵. Any couple who are unable to face various trials and obstacles in their household in their marriage will break up and opt for divorce as a last resort in solving the problem. Even though Islam allows divorce as a final solution, it still views that divorce is the most hated of permissible things to Allah⁶.

One of the principles of marriage law in Indonesia is to complicate the expression. However, divorce rates from year to year show a significant increase, both at the national level or regional regulation. Data reported by the Directorate General of the Court of Religious Courts Agency, in 2006 the divorce divorce request 54,645 (36, 71 %) and divorce of 94,245 (63.29 %). In 2007 the percentage of divorce rose up 63.51 % (111,584 cases) and divorce divorce decreased to 36.49 % (64,129 cases)⁷. In Islam, divorce should be the last resort when the situation has become too complicated and there is no other

¹ Distiliana and Herlinsi, "Hukum Perceraian Karena Kemurtadan Menurut Kompilasi Hukum Islam," *Jurnal Fakultas Hukum Universitas Palembang* 20, no. 2 (2022): 243-55; I Nyoman Sujana, "Akibat-Akibat Hukum Perceraian Dalam Perkawinan Campuran," *Jurnal Notariil* 1, no. 2 (2017): 58-67, <https://doi.org/10.22225/jn.2.1.154.58-67>.

² Linda Azizah, "Analisis Perceraian Dalam Kompilasi Hukum Islam," *Jurnal Hukum X*, no. 4 (2012): 415-22.

³ (Flood and Genadek 2016)

⁴ (Kasim and Semiaji 2022)

⁵ (Abdullah 2020)

⁶ (Panji et al. 2013)

⁷ Lilik Andaryuni, "Putusan Verstek Dalam Cerai Gugat Karena Pelanggaran Taklik Talak Di Pengadilan Agama Samarinda," *IstinbâthJurnal of Islamic Law* 16, no. 1 (2017): 224-40.

way to protect the interests of the husband and wife. Nevertheless, in reality the rules and procedure that have been determined in the religion are no longer heeded by most people. Many divorces took place for trivial and non-fundamental reasons⁸.

Divorce is a solution or an emergency exit when the husband-wife relationship cannot be maintained⁹. However, the problem and concern is the number of divorces from year to year continues to increase¹⁰. Divorce cases nationwide in recent years have increased, but this phenomenon cannot be generalized because each region has a different background and culture¹¹. Rather than an individual problem, divorce is a social problem that has a profound impact on the order of life¹². Actually, the increase in the number of divorces is currently a legal reality that occurs in Muslim world. To mitigate this trend, several Muslim countries such as Egypt, Pakistan, Tunisia and Morocco have carried out reforms in the field of family law¹³.

Law and justice carried out by judicial bodies cannot be separated from the role of judges. The existence of judges who prioritise competence, independence and impartiality is important in order to support a representative judiciary for the entire community, including for judges examining cases in civil courts in Indonesia. In this case, one of the cases in civil court is a divorce case. Divorce itself in the Islamic perspective is an emergency solution and the last resort for families who no longer find benefit in their married life, so in principle a divorce is the most hated thing before Allah Subhanahu wa ta'ala. However, the issue of divorce is a case that dominates religious courts in Indonesia. In this case, divorce is one of the reasons for the dissolution of a marriage as stated in Law Number 1 of 1974 concerning Marriage. Law Number 16 of 2021 concerning Amendments to Law Number 1 of 1974 concerning Marriage (UUP). Article 39 paragraph (1) of the UUP states that divorce can only be carried out before the court after the court has given an opportunity to reconcile.⁸ The judge acts as an intermediary for the parties to the dispute so that the rights and obligations of citizens are always guaranteed, and there must be reasons as specified in the law. The importance of these reasons aims to avoid the assumption that divorce is easy and to minimise the divorce rate¹⁴.

The Court as one of the administrators of Judicial Power has the main task of receiving, examining and adjudicating and settling every case submitted to it. In resolving each case, the judicial apparatus (judge) must adhere to the principles of justice

⁸ (Isnawati 2014)

⁹ (Junaedi 2018)

¹⁰ (Sahlan 2012)

¹¹ (Julijanto, Masrukhin, and Hayatuddin 2016)

¹² (Julijanto, Masrukhin, and Hayatuddin 2016; Nisa and Koentjoro 2022)

¹³ (Djawas et al. 2021)

¹⁴ (Jamil and Nur 2022)

which include swift, simple and low cost¹⁵. In the examination of divorce cases, the judge will be easier to seek peace if the husband and wife are present at the trial. The judge's position in the trial is very important, the judge is required to hear both parties. It can also mean that the judge may not receive information from one of the parties as a basis. Because in the trial of the judge's position as the party who will decide on the case, as well as the party who will reconcile both parties. The principle of the judge's obligation to reconcile the litigant parties, is in line with the demands and moral teachings of Islam. The judge should have been very selective in taking the *Verstek* decision. So, in the examination of the trial case, the trial must take place with the presence of both parties, if one of the parties is present then the examination must not be immediately decided by the verdict¹⁶.

METHOD

This study used a qualitative research approach, qualitative method is a method that focuses on in-depth observation¹⁷. Research using qualitative research aims to explore or build a proposition or explain the reality¹⁸. This type of research includes empirical juridical research, such as case studies, since the problems studied is found in a particular area and time¹⁹. This research was conducted at the Rembang Religious Court, Rembang Regency, Central Java Province. The sources of information specified in this study are the Chairperson of the Rembang Religious Court/Judge, Deputy Chairperson of the Rembang Religious Court/Judge, Judge of the Rembang Religious Court. The data were collected through observation, interviews and documentation studies. The data were processed and analyzed in four stages consisting of editing, classification, verification and analysis²⁰.

RESULT AND DISCUSSION

A *verstek* decision is handed down by a judge without the presence of the defendant or the respondent at the trial. In principle, the judge, through his or her facultative rights, is authorized to make or not make a decision without the presence of the defendant, as stipulated in Article 126 HIR (concerning *verstek*)²¹. The terms of *Verstek*'s decision are

¹⁵ (Purnamasari, Rahmat, and Adhyaksa 2017)

¹⁶ Ernawaty Hadji Ali and Dedi Sumanto, "Putusan *Verstek* Merupakan Putusan Yang Dijatuhkan Oleh Majelis Hakim Tanpa Hadirnya Tergugat," *Jurnal Al-Himayah* 5, no. 1 (2021): 50–64.

¹⁷ (Mariana and Ibrahim 2021; Mariana and Murthaza 2019)

¹⁸ (Nufiar et al. 2022)

¹⁹ (Nufiar, Mariana, and Muhammad Ali 2020)

²⁰ Mariana Mariana and Amsanul Amri, "Hawalalah Mutlaqah Dalam Perspektif Syafi'iyah Dan Hanafiyah," *SINTESA: Jurnal Kajian Islam Dan Sosial Keagamaan* 1, no. 2 (2021): 136–47.

²¹ (Abdullah 2020)

that the defendant will be formally summoned from the court handling the dispute, then the defendant does not appear without providing valid reasons, the defendant does not file an exception of competence²². If all of the mentioned elements are met, then a decision can be expressed in a *verstek* decision. The *verstek* imposition of court decisions is regulated in Article 125 HIR paragraph (1) or Article 149 RBg paragraph (1)²³.

A judge's evaluation is one of the most important aspects in the realization of the value of justice (*ex aequo et bono*) and legal certainty in a court decision. Besides, a judge's evaluation also benefits both parties concerned so that it must be carefully made. If a judge's evaluation is not thoroughly and carefully made, any decision based on it will be canceled by the High Court/Supreme Court²⁴. Islam teaches its adherents to find the best way if there is a conflict between husband and wife in their household, commonly known as "disputes and quarrels" which should be resolved through deliberation towards peace and not take it to court, because the results of deliberations that end in peace will have better results. Like a house with a broken door or leaking roof tiles, the door must be replaced with a new one or repaired. Likewise, the leaking roof tile must be replaced with a good tile, and not knock down or destroy the house. If what happens is to solve the problem by destroying the house then the result is that all the items in the house become damaged and useless again, the solution as above can be applied to cases in households that are being hit by conflict, including children and their future will be destroyed due to the selfishness of their parents. That is a picture of a wrong settlement and this is done by many husbands and wives in solving their household problems. The solution should be found and resolved what is the cause of the dispute and quarrel. Not by destroying the building of the household by submitting the case to the Religious Court which ends in divorce.

Divorce, even if it happens is as a door of *dharurat*, the last resort, because divorce although permissible but divorce is very hated by Allah SWT. Even the sky and arsh are very shaken because a husband and wife are divorced. It should be possible to minimize the lips of discord and quarrel without sacrificing the household building that has been through the same difficulty and pleasure for years, even decades. It is like a year's heat removed by a day's rain. *Taklik talak* is a divorce whose fall depends on certain agreed-upon matters or reasons. *Taklik talak* is not an agreement that must be made in every marriage. However, once *taklik talak* has been promised. It cannot be revoked. If in the future one or all of what has been pledged occurs, the wife can complain to the Religious

²² (Andreas and Ariawan 2023)

²³ (Rusydi 2020)

²⁴ A. Mukti Arto, *Praktek Perkara Perdata Pada Pengadilan Agama* (Jakarta: Pustaka Pelajar Offset, n.d.).

Court, and if the reason is proven, the judge will break the marriage (Aini 2018). Forms of violation of taklik talak that are used as reasons for filing for divorce include ²⁵:

1. Leaving the wife for 2 consecutive years,
2. Not giving mandatory maintenance for 3 months,
3. Hurting the wife's body / physical or,
4. Leaving or not caring for the wife for 6 months or more.

As for what is used as a consideration by the Panel of Judges, among others:

1. Legal considerations, when the judge handed down his decision, the judge considered the arguments and legal evidence submitted.
2. Consider maslahat, namely considering the condition of the parties' broken households
3. and whether the marriage is continued to bring more maslahat or mafsadat. If the mafasadat is more significant, the judges will grant the lawsuit.

In divorce cases, various types of law violations can occur. Here are some common examples:

1. Non-compliance with court orders: Violations occur when one party fails to comply with court orders issued during the divorce proceedings. This can include disregarding orders related to child custody, visitation schedules, spousal support payments, or the division of assets.
2. Concealment of assets: If one spouse deliberately hides or fails to disclose marital assets during the divorce process, it can be considered a violation. This is especially relevant during property division proceedings where both parties are required to provide full and accurate information about their financial holdings.
3. False or misleading information: Providing false or misleading information to the court or the other party is a violation of the law. This can include falsifying documents, misrepresenting income or financial status, or providing inaccurate information about assets or debts.
4. Violation of restraining orders or protective orders: In cases where domestic violence or abuse is involved, the court may issue restraining orders or protective orders to ensure the safety and well-being of the affected party. Violating these orders can result in legal consequences.
5. Parental alienation: Parental alienation occurs when one parent intentionally undermines the relationship between the child and the other parent. This can

²⁵ Abdul Hafizh, "Pelaksanaan Taklik Talak Dalam Hukum Perkawinan (Studi Pada Wilayah KUA Kec. Padang Barat Dan Pengadilan Agama Kelas 1A Padang Tahun 2010-2013)," *Ijtihad* 35, no. 2 (2019).

involve making false accusations, denying visitation rights, or engaging in behaviors that negatively impact the child's perception of the other parent.

6. Unauthorized removal of a child: If one parent removes a child from the jurisdiction or relocates without the consent of the other parent or the court, it can be a violation of custody and visitation rights.
7. Contempt of court: Engaging in behaviors that disrespect or obstruct the authority of the court, such as refusing to comply with court orders, not appearing in court as required, or disrupting court proceedings, can be considered contempt of court.

It's important to note that the specific types of law violations in divorce cases can vary depending on the jurisdiction and the applicable laws. If you believe a law violation has occurred during your divorce case, it is advisable to consult with an experienced family law attorney who can provide guidance based on the laws in your jurisdiction. In the case of Verstek's divorce, the law of law can occur if the applicable legal procedure is not to be appointed faithful or if the rights of one of the parties are violated. The following are some examples of violations of the law that multiply occur in cases of Verstek Draction:

1. Violations of Legal Procedures: This violation can occur if the party submitting the division does not follow the procedures determined by the country's law. For example, if the party who submits a divorce is not a correct member of publicity to another party or does not meet certain administrative requirements.
2. Violations of the rights of other parties: In the case of Verstek's dipping, there is a risk that those who are not present at the trial cannot maintain their rights with Sepenuchya. However, those who submitted the Body of Haru ensured that the rights of other parties were still respected. If the rights of other parties are violated, such as the right to obtain information, the rights of Tagus present evidence, or the right of the members of the opinion, this can be considered a violation of the law.
3. Ignorance about the involvement: Violations of millions can occur if one party does not have sufficient emergence about their trials and rights. If the party who is not present is not given enough information about the involvement or the consequences of the verdict of the Verstek, this can cause diligence and is considered a violation of the law.

It is important to remember that each country eliminates different divorce laws, and violations of the law in the Verstek divorce case can vary depending on the jurisdiction where the case is sent. If the funds face this kind of situation, it is advisable to sow assistance from a lawyer or legal expert who is experienced in the jurisdiction and get the right advice.

According to Law Number 1 Year 1974 in Article 39, divorce can only be carried out in front of a court session after the court concerned has tried and failed to reconcile the two parties. To divorce, there must be sufficient reason that the husband and wife will not be able to live together as husband and wife. The reasons that can be used as the basis for divorce according to this marriage law as stipulated in Government Regulation Number 9 of 1975 concerning the Implementation of Law Number 1 of 1974 include ²⁶:

1. One of the parties commits adultery or becomes a drunkard, addict, gambler and so on that is difficult to cure. This reason can be used to file for divorce, because if someone has committed adultery, it means that he has betrayed the sanctity and sacredness of a marriage. These acts are a violation of religious law and positive law, but it must be seen, a husband who has been drunk in a cafe but he only did this one time and because he was influenced by his friend is certainly not a reason for divorce.
2. One of them leaves the other for 2 (two) consecutive years without the other party's permission and without valid reasons or for other reasons beyond his/her control. This is related to the obligation to provide both physical and mental support, which if then one party leaves the other party for a long time without the permission of the spouse, it will result in the non-fulfillment of the obligations that must be given to the spouse, so that if the spouse is then unwilling, he/she can submit this reason to be the basis for filing a divorce suit in court, but of course the reason must be thoroughly researched.
3. One of the parties received a prison sentence of 5 (five) years or a heavier sentence after the marriage took place. Almost the same as the reason in the previous point, this point can also be used as a reason by one of the parties to file a divorce suit. Because if one of the parties is serving a prison sentence of 5 (five) years or more, it means that the person concerned cannot carry out his obligations as a husband / wife.

CONCLUSION

In a verstek divorce case, a violation of the law can occur if there is a violation of the procedures or rights guaranteed by law in the divorce process. Here are some examples of violations of the law that may occur in verstek divorce cases, namely violations of the

²⁶ Elfirda Ade Putri, "Perlindungan Hukum Terhadap Perceraian Akibat Perselisihan Terus Menerus," *Jurnal Hukum Sasana* 7, no. 1 (2021): 163–81, <https://doi.org/10.31599/sasana.v7i1.618>; Rezki Amaliah, Dachran S. Busthami, and Anggreany Arief, "Penerapan Putusan Verstek Dalam Perkara Perceraian Di Pengadilan Agama Kelas LI Majene," *Journal of Lex Generalis (JLS)* 2, no. 3 (2021): 1344–51; Dahwadin et al., "Hakikat Perceraian Berdasarkan Ketentuan Hukum Islam Di Indonesia," *Yudisia : Jurnal Pemikiran Hukum Dan Hukum Islam* 11, no. 7 (2020): 93.

rights of absent parties, non-compliance with procedural requirements, violation of the rights of absent parties in the decision, fraud or manipulation in the divorce process. Violations of the taklik talak that are used as grounds for filing for divorce include leaving his wife for 2 consecutive years, not providing mandatory alimony for 3 months, inflicting physical harm on his wife or neglecting or ignoring his wife for 6 months or more.

REFERENCES

- Abdullah, Taufik. *Analisis Putusan Verstek Perkara Cerai Talak Perspektif Keadilan Sosial (Studi Analisis Putusan Verstek Perkara Nomor 0520/Pdt.G/2014 PA.Kab.Kediri)*. Jawa Timur: Dimar Intermedia, 2020.
- Ali, Ernawaty Hadji, and Dedi Sumanto. "Putusan Verstek Merupakan Putusan Yang Dijatuhkan Oleh Majelis Hakim Tanpa Hadirnya Tergugat." *Jurnal Al-Himayah* 5, no. 1 (2021): 50–64.
- Amaliah, Rezki, Dachran S. Busthami, and Anggreany Arief. "Penerapan Putusan Verstek Dalam Perkara Perceraian Di Pengadilan Agama Kelas LI Majene." *Journal of Lex Generalis (JLS)* 2, no. 3 (2021): 1344–51.
- Andaryuni, Lilik. "Putusan Verstek Dalam Cerai Gugat Karena Pelanggaran Taklik Talak Di Pengadilan Agama Samarinda." *IstinbâthJurnal of Islamic Law* 16, no. 1 (2017): 224–40.
- Andreas, Darren, and Ariawan Ariawan. "Penerapan Teori Keadilan Dalam Putusan Verstek." *JISIP (Jurnal Ilmu Sosial Dan Pendidikan)* 7, no. 1 (2023): 633–39. <https://doi.org/10.58258/jisip.v7i1.4483>.
- Arto, A. Mukti. *Praktek Perkara Perdata Pada Pengadilan Agama*. Jakarta: Pustaka Pelajar Offset, n.d.
- Azizah, Linda. "Analisis Perceraian Dalam Kompilasi Hukum Islam." *Jurnal Hukum X*, no. 4 (2012): 415–22.
- Dahwadin, Enceng Iip Syaripudin, Eva Sofiwati, and Muhamad Dani Somantri. "Hakikat Perceraian Berdasarkan Ketentuan Hukum Islam Di Indonesia." *Yudisia : Jurnal Pemikiran Hukum Dan Hukum Islam* 11, no. 7 (2020): 93.
- Distiliana, and Herlinsi. "Hukum Perceraian Karena Kemurtadan Menurut Kompilasi Hukum Islam." *Jurnal Fakultas Hukum Universitas Palembang* 20, no. 2 (2022): 243–55.
- Djawas, Mursyid, Ridhwan, Soraya Devy, and Asmaul Husna. "The Government's Role in Decreasing Divorce Rates in Indonesia: The Case of Aceh and South Sulawesi." *Ahkam: Jurnal Ilmu Syariah* 21, no. 1 (2021): 163–88.
- Flood, Sarah M., and Katie R. Genadek. "Time for Each Other: Work and Family

- Constraints Among Couples." *Journal of Marriage and Family* 78, no. 1 (2016): 142–64. <https://doi.org/10.1111/jomf.12255>.
- Hafizh, Abdul. "Pelaksanaan Taklik Talak Dalam Hukum Perkawinan (Studi Pada Wilayah KUA Kec. Padang Barat Dan Pengadilan Agama Kelas 1A Padang Tahun 2010-2013)." *Ijtihad* 35, no. 2 (2019).
- Isnawati, Rais. "Tingginya Angka Cerai Gugat (Khulu') Di Indonesia; Analisis Kritis Terhadap Penyebab Dan Alternatif Solusi Mengatasinya." *Al-'Adalah* Vol. XII, no. 1 (2014): 1–14.
- Jamil, Abdul, and Muliadi Nur. "Perlindungan Hukum Dan Keadilan Para Pihak Melalui Ex Officio Hakim Dalam Putusan Verstek Perkara Perceraian." *Jurnal Hukum Ius Quia Iustum* 29, no. 2 (May 2022): 439–60. <https://doi.org/10.20885/iustum.vol29.iss2.art10>.
- Julijanto, Muhammad, Masrukhin Masrukhin, and Ahmad Kholis Hayatuddin. "Dampak Perceraian Dan Pemberdayaan Keluarga Studi Kasus Di Kabupaten Wonogiri." *BUANA GENDER: Jurnal Studi Gender Dan Anak* 1, no. 1 (2016): 55–77. <https://doi.org/10.22515/bg.v1i1.71>.
- Junaedi, Mahfudz. "Fenomena Perceraian Dan Perubahan Sosial: Studi Kasus Di Kabupaten Wonosobo." *Syariati: Jurnal Studi Al-Qur'an Dan Hukum* 4, no. 01 (2018): 83–104. <https://doi.org/10.32699/syariati.v4i01.1166>.
- Kasim, Nur Mohamad, and Trubus Semiaji. "Divorce Cases in Members of Indonesian Police Force: A Positive Law Perspective." *Jurnal Ilmiah Al-Syir'ah* 20, no. 1 (2022): 91. <https://doi.org/10.30984/jis.v20i1.1793>.
- Mariana, and Ibrahim. "Peran DPR Dalam Pengangkatan Duta Besar Setelah Amandemen UUD 1945." *Jurnal Tahqiqqa* 15, no. 1 (2021): 1–14.
- Mariana, Mariana, and Amsanul Amri. "Hawalah Mutlaqah Dalam Perspektif Syafi'iyah Dan Hanafiyah." *SINTESA: Jurnal Kajian Islam Dan Sosial Keagamaan* 1, no. 2 (2021): 136–47.
- Mariana, and Muhammad Murthaza. "Etika Bisnis Dalam Perspektif Hukum Islam (Studi Kasus Pada Swalayan Kota Sigli)." *Tahqiqqa* 13, no. 1 (2019): 62–72.
- Nisa, Haiyun, and Koentjoro Koentjoro. "Some Issues about Women Who File for Divorce in Aceh." *Gender Equality: International Journal of Child and Gender Studies* 8, no. 1 (2022): 74. <https://doi.org/10.22373/equality.v8i1.12237>.
- Nufiar, Mariana, and Muhammad Ali. "Settlement of Problematic Loans in the Unit Pengelola Kegiatan (UPK) of Pidie District Did Sharia." *Journal of Social Science* 1, no. 4 (2020): 147–51. <https://doi.org/10.46799/jsss.v1i4.55>.
- Nufiar, Rahmad, Safriadi, and Mariana. "Determination Of The Cost Maintenance Of Pawned Goods In Islamic Law The Perspective." *Baltic Journal of Law & Politics* 15, no. 3 (2022): 1561–70. <https://doi.org/10.2478/bjlp-2022-002107>.

- Panji, M A, Permohonan Izin, Ikrar Talak, Moch Abdul Panji, Liliek Istiqomah, Ikarini Dani Widiyanti, Jurusan Ilmu Hukum, Fakultas Hukum, and Universitas Jember Unej. "Permohonan Izin Ikrar Talak Yang Ditolak Karena Tidak Memenuhi Kualifikasi Surat Permohonan (Studi Putusan Mahkamah Agung Nomor : 184 K / AG / 2009) The Rejection Of Pledge Divorce Tender Because Of The Unfulfilled 184 K / AG / 2009)." *Atikel Hasil Penelitian Mahasiswa 1*, no. 1 (2013): 1-5.
- Purnamasari, Fitri, Diding Rahmat, and Gios Adhyaksa. "Pelaksanaan Mediasi Pada Penyelesaian Perceraian Di Pengadilan Agama Kuningan." *UNIFIKASI : Jurnal Ilmu Hukum 4*, no. 2 (2017): 98. <https://doi.org/10.25134/unifikasi.v4i2.729>.
- Putri, Elfirda Ade. "Perlindungan Hukum Terhadap Perceraian Akibat Perselisihan Terus Menerus." *Jurnal Hukum Sasana 7*, no. 1 (2021): 163-81. <https://doi.org/10.31599/sasana.v7i1.618>.
- Rusydi, Bustanul Arifien. "Problem Kehadiran Dan Upaya Hukum Tergugat Dalam Putusan Verstek Perkara Perceraian Pada Pengadilan Agama Bandung." *Muslim Heritage 5*, no. 2 (2020): 393. <https://doi.org/10.21154/muslimheritage.v5i2.2362>.
- Sahlan, Muhammad. "Perceraian, Sosiologi." *Substantia: Jurnal Ilmu-Ilmu Ushuluddin 14*, no. 1 (2012): 88-97.
- Sujana, I Nyoman. "Akibat-Akibat Hukum Perceraian Dalam Perkawinan Campuran." *Jurnal Notariil 1*, no. 2 (2017): 58-67. <https://doi.org/10.22225/jn.2.1.154.58-67>.