



A Comparative Study of Class Action Procedures in France and Lithuania as a Solution to the Legal Vacuum in Indonesia's Administrative Courts

Studi Komparatif Prosedur Class Action Prancis dan Lithuania Sebagai Solusi Kekosongan Hukum PTUN Indonesia

Jeremiah Jung Liah¹, Shinta Hadiyantina², Sudarsono³

¹Corresponding author: jeremiah@student.ub.ac.id

¹²³Faculty of Law, Brawijaya University, Malang
East Java, Indonesia – 65145

Abstract: Research on the absence of a *class* action mechanism in Indonesia's Administrative Courts (PTUN) is crucial given the massive impact of government policies on groups of citizens. This study aims to analyze the legislative rationale behind current regulations, the legal implications of the regulatory vacuum, and to formulate an ideal class action framework for the PTUN through a comparative study with France and Lithuania. The research method employed is normative legal analysis using legislative, conceptual, comparative, and case-based approaches. The findings reveal that the absence of explicit rules leads to legal uncertainty and disparity in judicial decisions, as current procedures rely on civil procedural law that is incompatible with the public law characteristics of the PTUN. Based on the French and Lithuanian models, this study proposes redefining the legal subject as "members of the public" and integrating a standalone class action procedure into the PTUN Law. In conclusion, this transformation is crucial for realizing the principles of speedy and cost-effective adjudication, to ensure collective rights are protected from administrative arbitrariness in accordance with the ideals of the Indonesian welfare state.

Keywords: Class Action; Administrative Court; Comparative Study; Welfare State; Legal Reform.

DOI : 10.47006/ijlres.v%vi%i.29509

INTRODUCTION

The vision of Indonesia's welfare state (*Welfare State*), as enshrined in the Preamble to the 1945 Constitution of the Republic of Indonesia, aims to advance the general welfare and social justice (Elviandri, 2019, p. 253). As a manifestation of the principle of the Pancasila-based rule of law, the state is obligated to protect the fundamental rights of its citizens through governance grounded in law (Djauhari, 2018, p. 31). Within the framework of administrative

law, the existence of the Administrative Court (PTUN) serves as a crucial instrument to safeguard the public's rights against arbitrary actions or decisions by the government (Iskandar & Reni, 2025, p. 505). However, the effectiveness of this protection faces challenges when an administrative policy causes massive adverse effects on a group of citizens simultaneously within the same jurisdiction. This situation demands an efficient litigation mechanism to accommodate the interests of groups sharing common legal facts.

Data shows a significant increase in cases at the Administrative Court over the past six years, reflecting the public's heightened legal awareness of their constitutional rights.

Figure 1

Number of Decisions at the Indonesian Administrative Court (2019–2024)



Source: Secondary Legal Materials, Directory of Decisions of the Supreme Court of the Republic of Indonesia, processed, 2025.

Although the *class action* mechanism has been recognized in civil procedure law through Supreme Court Regulation No. 1 of 2002, from a formal legal perspective, the subject of class plaintiffs and the applicable procedural law have not been explicitly regulated in either the Administrative Court Law or the Government Administration Law. A literature review of judicial practice reveals a gap in the form of disparity in rulings; some judges accept class-action lawsuits based on the principle of *ius curia novit* and teleological interpretation, while others reject them on the grounds that the plaintiffs lack legal standing. *The novelty* of this research lies in the formulation of an ideal procedural framework for *class actions* in Indonesian Administrative Courts through a comparative study with France and Lithuania, which have already established such provisions in a positivistic manner within their administrative judicial systems.

The urgency of this research stems from the legal uncertainty caused by differing judicial interpretations in adjudicating *class action* cases at the Administrative Court. Without standardized regulations, the principles of swift, simple, and cost-effective adjudication

become difficult to achieve, as judges must examine numerous claims separately despite identical legal facts and subjects of dispute (P. P. Indonesia, 2009). Furthermore, from a legal development perspective, the recognition of class action plaintiffs is crucial for providing broader access to justice for communities affected by public policies, particularly following the expansion of the Administrative Court's jurisdiction to adjudicate unlawful acts by the government (*Onrechtmatige Overheidsdaad*).

Based on the above discussion, the legal issues raised in this study are: First, what is the ratio legis of the regulations governing class action plaintiffs and administrative procedural law in the Indonesian Administrative Court (PTUN)? Second, what are the legal implications of the absence of regulations regarding *class action* plaintiffs and their procedural law within the Indonesian administrative judiciary system? Third, what is the ideal formulation of *class action* procedural law regulations in the Indonesian Administrative Court (PTUN) through a comparative study with *the French Code de Justice Administrative* and *the Lietuvos Respublikos administracinių bylų teisenos įstatymas of Lithuania*?

This study has several objectives. First, to analyze the ratio legis of regulations concerning plaintiffs and procedural law within the Indonesian Administrative Court (PTUN). Second, to identify the consequences of legal gaps and analyze the dynamics of judicial decisions in handling class action lawsuits. Third, to formulate a *grand design* for an ideal *class action* procedural law framework to be implemented in the Indonesian Administrative Court by adopting key principles from the administrative justice systems in France and Lithuania.

This study employs normative legal research (*Normative Legal Research*) (Rizkia & Fardiansyah, 2023, p. 120), which involves examining law as written rules, norms, principles, or legal doctrines that support (Soekanto & Mamudji, 2010, p. 14). According to Peter Mahmud Marzuki, normative research refers to literature sources to question the truth or clarity of a norm (Peter Mahmud Marzuki, 2017, p. 133). This is relevant to the focus of this study, which examines the implications of a legal vacuum regarding the recognition of *class action* plaintiffs in the procedural law of the State Administrative Court (PTUN) in Indonesia.

To analyze this issue, this study employs several approaches, beginning with *the statutory approach*, which comprehensively and systematically reviews regulations related to the research problem (Muhaimin, 2020, p. 56). A *conceptual approach* is also applied, grounded in legal doctrines, principles, and theories to formulate new solutions to address legal gaps. Additionally, a *comparative study approach* is used to compare *class action* regulations in the

Administrative Court of Indonesia with *the French Code de Justice Administrative* and *the Lithuanian Law on Administrative Proceedings* (Wiwik Sri Widiarty, 2024, p. 120). *The historical approach* is used to analyze the ratio legis of the formation and development of PTUN regulations in Indonesia. To explore ontological and theological aspects in depth in addressing legal gaps, the researcher applies a philosophical analysis approach. Finally, *the case study approach* was conducted by examining the ratio decidendi and obiter dicta in various PTUN decisions related to class-action lawsuits.

Legal research consists of three types of legal sources: primary, secondary, and tertiary legal materials (Arista, 2019). These sources, collected through a literature review, were then analyzed using qualitative legal analysis techniques with deductive reasoning, presented in a descriptive, systematic, and structured manner to avoid misinterpretation (Aprita & Adhitya, 2020, p. 166). Additionally, the method of legal interpretation and discovery (*Rechtsvindning*) (Hakim, 2016, p. 228) was employed to understand the legal principles judges apply when adjudicating *class action* cases.

RESULTS AND DISCUSSION

Ratio Legis: Regulation of Plaintiffs and Administrative Court Procedure Law in Indonesia

Ratio legis is essentially understood as the philosophical reason or purpose behind the enactment of a law (*The Reason Or Occasion Of A Law*) (Black, 1991, p. 1427). In the Indonesian context, the establishment of the Administrative Court (PTUN) is a *conditio sine qua non* for fulfilling the mandate of the Pancasila-based rule of law. Philosophically, its existence aims to ensure harmony between the interests of individual citizens and government actions, while also serving as an instrument to limit the power of the authorities to prevent the abuse of authority (*Abuse of Functions*) or *detournement de pouvoir* (Mawardi, 2016, p. 1). The enforcement of human rights and legal certainty are the main pillars justifying why this judicial institution must exist and be independent from the executive branch (Hadjon, 1987, p. 107).

History records that the concept of administrative justice in Indonesia emerged as early as Law No. 19 of 1948, but it was not fully realized until the enactment of Law No. 5 of 1986 during the New Order era (Siahaan, 2009, p. 39). In its early stages, the legal policy of the State Administrative Court (PTUN) tended to reflect a high degree of “state caution” due to the strong dominance of the executive branch at the time (Kaharudin, 2011, p. 291). This is evident from the limited scope of executive authority and the highly specific definition of Administrative Decisions (KTUN), aimed at ensuring that the functioning of the government is not easily hindered by public lawsuits.

Regarding legal subjects, the legislative rationale for limiting plaintiffs to “individuals or civil legal entities” is based on the desire to clarify the PTUN’s jurisdiction to external disputes only (Mangkoedilaga, 1988, p. 16). This restriction aims to avoid internal disputes among government agencies in order to maintain the *unitary executive* (Kurnia, 2024, p. 66). Furthermore, in practice, the use of individual plaintiffs facilitates judges in assessing *legal standing* and proving actual damages, as proving damages of a collective or general nature is considered far more complex.

A significant development occurred with the enactment of Law No. 30 of 2014 on Government Administration (Government Administration Law). The presence of this Government Administration Law offers new hope for bureaucratic reform by serving as substantive law for the Administrative Court, which previously had only procedural law (Dharmawan, 2013). Its primary objective is to establish clear codification for the actions of government officials, thereby protecting citizens from maladministration. In the GA, the term “plaintiff” is integrated into “citizens,” although technically the definition still refers to biological human individuals (a person) or civil legal entities.

Although philosophically the Administrative Court (PTUN) and the Administrative Law (UU AP) aim to protect the interests of the broader public, from a textual-positivist perspective, the mechanism for *class-action* lawsuits has not been explicitly regulated in either of these laws. Currently, the avenue for class actions in the Administrative Court is only partially opened through Perma No. 1 of 2023, but even that is limited to environmental cases and still refers to the civil procedural rules in Perma No. 1 of 2002 (M. A. R. Indonesia, 2023). This creates legal obstacles because the nature of civil procedure law is often incompatible with the public law principles upheld by the Administrative Court.

Overall, when analyzed through the MPFATAC theoretical framework, the PTUN functions as a *judicial control* mechanism ensuring the government acts within legal boundaries (*Intra Vires*) (Muchsan, 1981b, p. 13). However, there is an urgent need to refine the procedural law regarding class-action lawsuits to align with the ideals of Indonesia’s welfare state, which prioritizes justice for society as a collective, not merely for individuals (Muchsan, 1981a, p. 4). Thus, the reformulation of procedural law directly integrated into the Administrative Court Law is key to realizing a simple, swift, and cost-effective judicial system for all segments of society.

Legal Implications of the Lack of Regulation on Plaintiff Subjects and Class Action Procedural Law

Theoretically, there is a fundamental difference between the terms legal effect, consequence, and implication. While effects and consequences refer to the direct and explicit impacts that occur immediately following an event, implications are indirect, speculative, and have far-reaching effects in the long term. In the context of this study, the absence of regulations regarding class action plaintiffs in the State Administrative Court (PTUN) system is not merely a technical issue but has profound implications that can affect public welfare and the overall effectiveness of state policies.

The legal vacuum regarding *class actions* in the PTUN leads to *disparities* or differing interpretations among judges. Without written norms that *explicitly* recognize class action plaintiffs, judges in practice face a dilemma between adhering to rigid legal formalism or making a breakthrough in the name of substantive justice (Cristina, 2019, p. 47). Consequently, a wide variety of differing rulings emerge for cases with similar legal facts, which ultimately may undermine the principle of legal certainty.

In addressing complex administrative disputes, judges are required to formulate legal reasoning that encompasses *the Ratio Decidendi* the primary basis of argument determining the judgment's disposition and *the Obiter Dicta* supporting legal views (Wallace & Wild, 2013, p. 216). Although the two are often distinguished by definition, in practice they form an inseparable, cohesive whole. When there is a gap in *class action* rules, judges must be able to combine these two elements to discover the law (*Rechtsvinding*) so that cases are not dismissed merely due to the absence of procedural regulations.

Furthermore, a just ruling must fulfill legal, philosophical, and sociological dimensions (Cristina, 2019, p. 58). Sociologically speaking, judges must not merely be the "mouth of the law" (*la bouche qui prononce les paroles de la loi*), but must also consider the welfare of the broader public. If communities collectively affected by government policies are barred from filing class-action lawsuits, the Administrative Court risks becoming a tool for legitimizing bureaucracy and failing to fulfill its role as a watchdog over government actions.

For example, Jakarta Administrative Court Decision No. 129/G/2011 represents a significant breakthrough in which the judge accepted a *class-action* lawsuit by invoking the principle of judicial efficiency and the judge's duty to uncover the living values of justice within society (Kalaj et al., 2023, p. 99). The panel of judges in that case employed a teleological and systematic interpretation to overcome legal-formal obstacles, thereby

ensuring that the interests of the group of citizens harmed by a specific building permit remained protected.

A similar breakthrough was found in the Pekanbaru Administrative Court Decision No. 05/G/2013, in which an indigenous community was recognized as having legal standing to file a class-action lawsuit regarding customary land rights (Hukum Online, 2013). The judge ruled that although the Administrative Court Law (UU PTUN) only mentions “individuals or civil legal entities,” from a sociological perspective, indigenous communities have a genuine interest that must not be ignored. This demonstrates that the interpretation of harmonization between local regulations and general legal principles is crucial for filling existing procedural legal gaps.

In conclusion, the stagnation of procedural law resulting from the lack of regulation regarding *class actions* in the Administrative Court constitutes a regression in contemporary administrative law. Allowing this gap to persist is tantamount to letting procedural law become a shackle on substantive justice. Therefore, a proactive legal transformation is needed so that the principle of *ubi jus ibi remedium*—where there is a right, there is a remedy can truly be realized for all citizens without being hindered by bureaucratic rigidity.

The Ideal Formulation of Class Action Procedural Law in the Indonesian Administrative Courts

The formulation of an ideal legal framework for class action proceedings in Indonesia must be grounded in legal ideals that can be realised in practice (Aristotelian), rather than merely abstract concepts (Taekema & van der Burg, 2009, p. 2). Efforts to formulate these new norms must be grounded in concrete societal issues as well as comparative studies with countries possessing well-established administrative court systems, such as France and Lithuania. This step is crucial to ensure that the transformation of procedural law in Indonesia does not merely copy foreign systems wholesale, but is adapted to the values of Pancasila and the goals of the welfare state (Suny, 1978, p. 84).

France offers a highly progressive model through *the Code de Justice Administrative* (CJA), which explicitly regulates “class actions” (*L'action De Groupe*) within the administrative judiciary (Erwan Poisson dkk, 2025)). In the French system, such lawsuits may be filed to halt administrative violations while simultaneously seeking compensation for losses suffered by members of the public (Lingibé, 2025). The strength of this model lies in the direct integration

of *class action* procedures into their codified administrative procedural law, thereby providing a high degree of legal certainty for those seeking justice (Gouvernement, 2025).

Meanwhile, Lithuania offers inspiration through a redefinition of legal subjects that is highly accommodating of collective interests. In its administrative procedural law, Lithuania explicitly states that “a person” may refer to a single individual or “a group of people.” This provision breaks down the rigid limitations that have long been an obstacle in Indonesia, where plaintiffs are often required to prove harm on an individual and private basis. The Lithuanian model demonstrates that recognizing groups as independent legal subjects is key to simplifying access to justice for communities affected by public policies.

Drawing lessons from these two countries, the ideal formulation for Indonesia must begin with a repositioning of the meaning of the plaintiff’s legal standing in the Administrative Court Law. The term “an individual or a civil legal entity” needs to be reformulated as “members of the public,” encompassing both individuals and groups of people sharing common legal facts. This aims to end the dogmatic debate regarding group legal standing, which has often resulted in rulings of “not accepted” (N.O.). By expanding the scope of legal subjects, the Administrative Court can be more proactive in protecting the communal rights of citizens.

Procedurally, Indonesia needs to adopt a preliminary certification test mechanism to assess the eligibility of a *class representative* at the outset of proceedings. This framework must include a notification system as well as the right for citizens to *opt out* of the lawsuit if they feel it does not represent their interests. With such a structured framework, the trial process will not be bogged down by the convoluted process of verifying the identities of group members, thereby truly realizing the principles of speedy justice and cost-effectiveness.

Furthermore, it is crucial to integrate these class action provisions directly into the main body of the Administrative Court Law as substantive law, rather than merely through Supreme Court Regulations (Perma), which are of a limited nature. This aligns with experts’ views that procedural law must be directly enshrined in its parent statute so that the “ ” has strong enforceable authority. This integration will also grant PTUN judges the authority to adjudicate collective damages more effectively than current mechanisms allow.

In conclusion, this ideal formulation is a manifestation of the PTUN’s judicial control function in curbing the abuse of power by the authorities for the common good. By adopting the best elements of the French and Lithuanian systems, synergized with Indonesia’s local wisdom, the PTUN will transform into an institution that not only protects individuals but also safeguards the collective well-being of society. This is the grand design of future

procedural law capable of providing fair, certain, and beneficial legal protection for all the people of Indonesia.

CONCLUSION

Based on the ratio legis, the regulation of the Administrative Court (PTUN) in Indonesia is rooted in the protection of citizens' human rights within the framework of the Pancasila-based rule of law and social welfare, although currently the standing of plaintiffs is still strictly limited to individuals and civil legal entities in order to maintain the unity of government command. The lack of explicit regulation regarding class action mechanisms gives rise to legal implications such as legal uncertainty, disparity in judicial rulings, and structural barriers to accessing justice (*Access to Justice*) for groups of citizens collectively affected by government policies. The novelty of this research offers an ideal formulation through the redefinition of the plaintiff's subject as "members of the public," encompassing groups, as well as the integration of independent and specific class action procedures within the Administrative Court Law by adopting the efficiency of the French "*action de groupe*" model and the legal subject clarity of the Lithuanian model to replace reliance on civil procedural law that is incompatible with the nature of public law. The urgency of this research lies in the pressing need to proactively transform procedural law to realize the principles of swift, simple, and cost-effective adjudication, so that the restoration of the public's collective rights is no longer shackled by the procedural rigidity of bureaucracy.

REFERENCE

- 1) Aprita, S., & Adhitya, R. (2020). *Filsafat Hukum*. Rajawali Press. https://fliphtml5.com/rmove/rqra/Filsafat_Hukum_%28Dr._Serlika_Aprita%2C_S.H._%2C_M.H._Rio_Adhitya_etc.%29/227/
- 2) Arista, M. (2019, March 11). *Kapan Pertimbangan Putusan MK Dikatakan Mengikat dan Tidak Mengikat?* | *Klinik Hukumonline*. <https://www.hukumonline.com/klinik/a/kapan-pertimbangan-putusan-mk-dikatakan-mengikat-dan-tidak-mengikat-lt5c860ff16a550/>
- 3) Black, H. C. (1991). *Black's law dictionary: Definitions of the terms and phrases of American and English jurisprudence, ancient and modern*. West Publishing Co. <https://library.eyrcls.com/opac/detail-opac?id=1396>
- 4) Cristina, C. N. (2019). *Pertimbangan Hakim Dalam Menentukan Berat Ringannya Pidana Pada Tindak Pidana Penganiayaan Berencana Yang Menyebabkan Kematian (Analisis Putusan Nomor 146/PID.B/2015/PN. SKH Dan Putusan Nomor 558/PID.B/2012/PN.JKT.UT)* [Sarjana, Universitas Brawijaya]. <https://repository.ub.ac.id/id/eprint/169404/>
- 5) Dharmawan, S. (2013, June 26). *Pemerintah Targetkan Pengesahan UU Administrasi Pemerintahan Tahun Ini* [Htttps://kbr.id/]. KBR Media. <https://kbr.id/articles/indeks/pemerintah-targetkan-pengesahan-uu-administrasi-pemerintahan-tahun-ini>
- 6) Djauhari, D. (2018). Study the Theory of Welfare State in West and Islam Ic Perspective. *Jurnal Pembaharuan Hukum*, 5(3), 411–425. <https://doi.org/10.26532/jph.v5i3.3829>
- 7) Elviandri, E. (2019). Quo Vadis Negara Kesejahteraan: Meneguhkan Ideologi Welfare State Negara Hukum Kesejahteraan Indonesia. *Jurnal Mimbar Hukum*, 31(2), 252–266. <https://doi.org/10.22146/jmh.32986>
- 8) Erwan Poisson dkk. (2025). *Réforme des actions de groupe: Ce que change la loi du 30 avril 2025*. A&O Shearman. <https://www.aoshearman.com/fr-fr/insights/class-action-reform-key-changes-introduced-by-the-law-of-april-30-2025>
- 9) Gouvernement. (2025). *Ministère de l'Economie, des Finances et de la Souveraineté industrielle, énergétique et numérique Ministère des Petites et Moyennes Entreprises, du Commerce, de l'Artisanat, du Tourisme et du Pouvoir Ministère de l'Action et des Comptes publics, 2026, L'action de groupe expliquée en six questions*. <https://www.economie.gouv.fr/>
- 10) Hadjon, P. M. (1987). *Perlindungan hukum bagi rakyat di Indonesia: Sebuah studi tentang prinsip-prinsipnya, penanganannya oleh pengadilan dalam lingkungan peradilan umum dan pembentukan peradilan administrasi negara*. Bina Ilmu. <https://digilib.ub.ac.id/opac/detail-opac?id=34465>
- 11) Hakim, M. R. (2016). Implementasi Rechtsvinding Yang Berkarakteristik Hukum Progresif. *Jurnal Hukum Dan Peradilan*, 5(2), Article 2. <https://doi.org/10.25216/jhp.5.2.2016.227-248>
- 12) Hukum Online. (2013). *Putusan Pengadilan Tata Usaha Negara Pekanbaru Nomor 05/G/2013/PTUN-Pbr*. <https://www.hukumonline.com/pusatdata/detail/lt67345a95ee030/putusan-pengadilan-tata-usaha-negara-pekanbaru-nomor-05-g-2013-ptun-pbr/history/>
- 13) Indonesia, M. A. R. (2023). *Peraturan Mahkamah Agung Nomor 1 Tahun 2023 tentang Pedoman Mengadili Perkara Lingkungan Hidup*. <http://peraturan.bpk.go.id/Details/265021/perma-no-1-tahun-2023>

- 14) Indonesia, P. P. (2009). *Undang-undang (UU) Nomor 48 Tahun 2009 tentang Kekuasaan Kehakiman*. <https://peraturan.bpk.go.id/Details/38793/uu-no-48-tahun-2009>
- 15) Iskandar, F., & Reni, R. (2025). Peran Upaya Administratif dalam Meningkatkan Efisiensi dan Kepastian Hukum Sengketa Tata Usaha Negara. *SEIKAT: Jurnal Ilmu Sosial, Politik Dan Hukum*, 4(5), 504–511. <https://doi.org/10.55681/seikat.v4i5.1656>
- 16) Kaharudin, K. (2011). *Kompetensi Absolut Peradilan Tata Usaha Negara Pasca Berlakunya Undang-Undang Nomor 14 Tahun 2008 tentang Keterbukaan Informasi Publik* [Doctor, Universitas Brawijaya]. <https://repository.ub.ac.id/id/eprint/160837/>
- 17) Kalaij, B. S. R., Syaharani, S. S., Thalita, F., & Hapsari, S. (2023). Penerapan Gugatan Perwakilan Kelompok dalam Pengujian Keputusan Tata Usaha Negara di Peradilan Tata Usaha Negara. *Padjadjaran Law Review*, 11(1), 91–101. <https://doi.org/10.56895/plr.v11i1.1273>
- 18) Kurnia, T. S. (2024). President and Presidentialism: Executive Power Theory. *Refleksi Hukum: Jurnal Ilmu Hukum*, 9(1), 65–84. <https://doi.org/10.24246/jrh.2024.v9.i1.p65-84>
- 19) Lingibé, P. P. (2025, July 18). *Le décret du 16 juillet 2025 sur les actions de groupe: Entre rationalisation et risques d'exclusion*. Par Patrick Lingibé, Avocat. Village de la Justice. <https://www.village-justice.com/articles/decret-juillet-2025-sur-les-actions-groupe-entre-rationalisation-risques,54036.html>
- 20) Mangkoedilaga, B. (1988). *Lembaga Peradilan Tata Usaha Negara: Suatu Prospek di Masa Datang*. Angkasa. (Bandung). [//opac.lib.fh.usk.ac.id%2Findex.php%3Fp%3Dshow_detail%26id%3D683](http://opac.lib.fh.usk.ac.id%2Findex.php%3Fp%3Dshow_detail%26id%3D683)
- 21) Mawardi, I. (2016). *Paradigma Baru PTUN: Respon Peradilan Administrasi terhadap Demokratisasi*. Thafa Media. (Yogyakarta). [//opac.lib.fh.usk.ac.id%2Findex.php%3Fp%3Dshow_detail%26id%3D2464%26keywords%3D](http://opac.lib.fh.usk.ac.id%2Findex.php%3Fp%3Dshow_detail%26id%3D2464%26keywords%3D)
- 22) Muchsan, M. (1981a). *Beberapa catatan tentang hukum administrasi negara dan peradilan administrasi negara di Indonesia*. Liberty. https://books.google.co.id/books/about/Beberapa_catatan_tentang_hukum_administrasi.html?id=qL0WHAAACAAJ&redir_esc=y
- 23) Muchsan, M. (1981b). *Peradilan Administrasi Negara*. Liberty. <https://inlislite.ipdn.ac.id/opac/detail-opac?id=13921>
- 24) Muhaimin, M. (2020). *Metode Penelitian Hukum*. UPT. Mataram University Press. <https://eprints.unram.ac.id/20305/1/Metode%20Penelitian%20Hukum.pdf>
- 25) Peter Mahmud Marzuki. (2017). *Penelitian Hukum* (Edisi Revisi). Kencana Prenada Media Group. https://books.google.co.id/books/about/Penelitian_Hukum.html?id=CKZADwAAQB&redir_esc=y
- 26) Rizkia, N. D., & Fardiansyah, H. (2023). *Metode Penelitian Hukum (Normatif dan Empiris)*. CV Widina Media Utama. <https://repository.penerbitwidina.com/publications/564622/>
- 27) Siahaan, L. O. (2009). *Teori Hukum dan Wajah PTUN Setelah Amandemen 2004 (UU No. 5/1986 jo. UU No. 9/2004)*. Perum Percetakan Negara Republik Indonesia. <https://pdrh.law.ui.ac.id/koleksi/detail/403/teori-hukum-dan-wajah-ptun-setelah-amandemen-2004-uu-no-51986-jo-uu-no-92004>

- 28) Soekanto, S., & Mamudji, S. (2010). *Penelitian Hukum Normatif (Suatu Tinjauan Singkat)*. PT. Rajawali Pers.
- 29) Suny, I. (1978). *Mekanisme demokrasi Pancasila*. Aksara Baru.
- 30) Taekema, S., & van der Burg, W. (2009). *Ideals in Law* (SSRN Scholarly Paper No. 1672720). Social Science Research Network. <https://papers.ssrn.com/abstract=1672720>
- 31) Wallace, J., & Wild, S. E. (2013). *Webster's New World Law Dictionary*. HarperCollins.
- 32) Wiwik Sri Widiarty. (2024). *Buku ajar metode penelitian hukum*. Publika Global Media. <http://repository.uki.ac.id/14688/1/BukuAjarMetodePenelitianHukum.pdf>



Licensed under a Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International License
<https://creativecommons.org/licenses/by-nc-sa/4.0/>