



IMPLEMENTATION OF SUPREME COURT REGULATION NUMBER 2 OF 2015 JUNCTO SUPREME COURT REGULATION NUMBER 4 OF 2019 CONCERNING PROCEDURES FOR SETTLEMENT OF SIMPLE LAWSUITS REGARDING THE TIME LIMIT FOR SETTLEMENT OF SIMPLE LAWSUITS IN THE PALANGKA RAYA DISTRICT COURT

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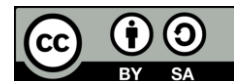
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ABSTRACT

The purpose of this research is to analyze the implementation of the deadline for resolving simple lawsuits based on Supreme Court Regulation (Perma) No. 2 of 2015 juncto Perma No. 4 of 2019 concerning the Procedure for Resolving Simple Lawsuits at the Palangka Raya District Court and to identify the factors causing the deadline to be exceeded. This research adopts an empirical legal method with a descriptive qualitative approach thru interviews and case data analysis using the Case Tracking Information System (SIPP). The research results show that the majority of simple lawsuits are not resolved within the 25 working days timeframe, with some cases even lasting up to 618 days. The delays are caused by the absence of the parties, the low level of legal understanding in society, the lack of good faith from the defendant, administrative obstacles, and the absence of sanctions for exceeding the deadline. This condition indicates a gap between norms and practices, so the goal of a simple lawsuit as a mechanism for quick, simple, and low-cost dispute resolution has not yet been fully realized.

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1. INTRODUCTION

The dynamics of civil procedural law in Indonesia emphasize the adjustment to the public's demand for a judicial system that is accessible, efficient, and economical as stipulated in Article 2 paragraph (4) of Law Number 48 of 2009 concerning Judicial Power. In reality, the process of resolving cases in court often takes a long time, extending over months, which results in increased costs that the parties must bear (Zaini et al., 2023). To address this issue, the Supreme Court (MA) introduced a simple lawsuit scheme as a breakthrough in realizing the principles of simple, quick, and low-cost justice, referring to the Small Claim Court model that has been implemented in countries such as the United States and Australia. (Purnawati, 2020).

The provisions regarding the simple lawsuit mechanism are determined by the Supreme Court of the Republic of Indonesia thru a regulation that governs the procedures for resolving simple lawsuits, which was subsequently refined thru regulatory changes in 2019. The regulation is intended to expedite the handling of civil

cases while still adhering to the principles of simple, fast, and low-cost justice. The emergence of this provision is backed by various complaints from seekers of justice regarding the often prolonged court proceedings. The regulation is expected to support the establishment of a responsive judicial system in a modern democratic state and provide optimal legal services for the community seeking justice. (Riskawati, 2018). The existence of such regulations is a response to the issues of procedural complexity and the duration of resolving conventional civil cases, which often becomes disproportionate when compared to the material value of the lawsuit or the substantive interests of the parties involved. (Putra, 2023). Dispute resolution in court (litigation process) is considered ineffective and costly because it can hinder or delay business processes. The court process is time-consuming and exhausting due to the highly formal and technical examination system, high court costs, and the possibility of multiple rounds of hearings. (Wibowo & Wijaya, 2021).

According to Article 5 paragraph (3) of Supreme Court Regulation No. 2 of 2015 concerning the Procedure for Simple Lawsuit Settlement, the entire process of settling a simple lawsuit must be completed within a maximum period of 25 days from the first hearing. The authority to examine and render a decision lies with a single judge appointed by the Chief Justice. The handling process begins with the registration of the case, followed by the verification of administrative requirements, the appointment of judges and substitute clerks, then preliminary examination, scheduling of hearings along with the summons of the parties, hearings accompanied by reconciliation efforts, the evidence stage, and finally the reading of the verdict.

The presence of the small claims court mechanism is based on the view that under certain conditions, conventional civil procedural law has not yet fully achieved the resolution of civil cases in accordance with the principles of swift, simple, and low-cost justice. Thus, the concept of small claims is expected to provide a more effective, efficient, and accessible judicial process for the community, especially for those seeking justice from the lower-middle economic group. This regulation is designed to enhance the effectiveness of the Small Claim Court thru a judicial mechanism oriented toward simplicity, speed, and low cost. The existence of simple lawsuits as part of civil procedural law in Indonesia is a manifestation of procedural reform driven by the need to reduce the accumulation of cases while simultaneously expanding and accelerating public access to justice. (Sinaga, et.al., 2025).

Although the simple lawsuit mechanism is designed to provide ease in resolving civil disputes, its application in practice is not without various problems. The parties involved in simple lawsuit cases often face a number of issues during the trial stage that affect the smoothness of the case examination process. Although Supreme Court Regulation No. 2 of 2015 on the Procedure for Simple Lawsuit Settlement has been enacted, in practice at the Palangka Raya District Court, there are still cases whose resolutions exceed the provisions of Article 5 paragraph (3), which states that "the resolution of a simple lawsuit should take no longer than 25 (twenty-five) days from the first hearing." As an institution within the general judiciary, the court has essentially implemented the simple lawsuit mechanism in handling a number of cases. This situation indicates a disharmony between the regulations outlined in the law and their implementation in practice. Based on the available data, it was found that many simple lawsuit cases in the Palangka Raya District Court took more than 25 days, which is the deadline set by law. Most cases are resolved within 30 to 45 working days, but some cases take more than 50 working days from the first hearing to the reading of the verdict. This indicates that in 2024 and 2025, almost all simple lawsuit cases were not resolved within the time frame set by the law.

The results of the empirical study confirm that there is a significant difference between the regulatory norms and the reality of simple lawsuit implementation at the court level. As evidenced by data obtained from the Case Tracking Information System (SIPP) of the Palangka Raya District Court, it can be seen that the majority of simple lawsuit cases registered in 2024 and 2025 were resolved in a time frame exceeding the maximum limit of 25 working days. This condition reflects a disharmony between regulations and their implementation at the Palangka Raya District Court, particularly regarding compliance with the deadline for resolving simple lawsuit cases. The exceeding of the deadline for resolution has become a significant issue, considering the essence of the small claims court mechanism, which is to establish a judicial process that is quick, simple, and efficient for the community seeking justice. If the resolution of small claims cases takes a period of time not much different from regular civil lawsuits, then the main objective of establishing such specific regulations cannot be optimally achieved.

As a contribution to the development of civil procedural law in Indonesia, this research aims to strengthen the application of the principles of simple, fast, and low-cost justice as stipulated in Article 2 paragraph (4) of Law No. 48 of 2009 on Judicial Power. The focus of this study examines various determinants that cause the resolution of simple lawsuits to exceed the 25 working days deadline from the first hearing. As outlined in the background, the Author can formulate the problem as follows: How is the Implementation of the Supreme Court Regulation (Perma) Number 2 of 2015 in conjunction with Perma Number 4 of 2019 regarding the Regulation of Simple Lawsuit Settlement Time Limits at the Palangka Raya District Court, and what Factors are Hindering the Application of Simple Lawsuit Settlement Time Limits at the Palangka Raya District Court? Based on this, the

Author is motivated to conduct research with the title "Implementation Of Supreme Court Regulation Number 2 Of 2015 Juncto Supreme Court Regulation Number 4 Of 2019 Concerning Procedures For Settlement Of Simple Lawsuits Regarding The Time Limit For Settlement Of Simple Lawsuits In The Palangka Raya District Court."

2. RESEARCH METHODS

The approach used in this research is empirical juridical, which is a method that places law as a factual phenomenon reflected in actual behavior and examines how legal norms are implemented in social life (Muhaimin, 2020). Its implementation is carried out thru an analysis of the practice of applying legal provisions in the resolution of simple lawsuits at the Palangka Raya District Court.

The research data is classified into two groups. The first category consists of primary data obtained directly from the field thru observations at the Class IA Palangka Raya District Court located at Jalan Diponegoro No. 21, Langkai Village, Pahandut District, Palangka Raya City, Central Kalimantan 73111, as well as thru in-depth interviews with judges at the Palangka Raya District Court. The selection of judges as key informants is based on the consideration that judges are subjects who have direct authority in the implementation and supervision of simple lawsuits at the Palangka Raya District Court. Secondly, secondary data was collected thru literature review to establish a theoretical foundation sourced from regulations and archives related to the study object. The data was obtained from case documentation in the SIPP of the Palangka Raya District Court, legal literature, and various relevant regulations.

3. RESULT AND ANALYSIS

Implementation of the Supreme Court Regulation Number 2 of 2015 in conjunction with the Supreme Court Regulation Number 4 of 2019 on the Regulation of Time Limits for Simple Lawsuit Resolutions at the Palangka Raya District Court

Perma No. 4 of 2019, as a regulation amending Perma No. 2 of 2015 concerning the Procedures for Simple Lawsuit Settlement, was enacted to accelerate the resolution of civil disputes in accordance with the principles of simple, fast, and low-cost justice. Small claims court as a procedure for resolving civil disputes with certain conditions and restrictions aimed at simplifying the resolution process so that it can be completed more quickly. (Listyawati, 2021). The background for the issuance of this regulation is closely related to the issues of case accumulation and prolonged case resolution duration, which are among the structural problems faced by the judiciary. The enactment of the regulation is also positioned as a strategic instrument to reduce the backlog of cases within the Supreme Court thru the revision and improvement of the simple lawsuit mechanism previously regulated by Perma No. 2 of 2015 (Mumek, et.al., 2024).

The revision of the simple lawsuit mechanism was carried out thru Perma No. 4 of 2019, which amended the provisions in Perma No. 2 of 2015 concerning the Procedure for Resolving Simple Lawsuits. In the amendment, Article 3 paragraph (1) stipulates that "Simple lawsuits can only be filed for default and/or unlawful acts (PMH) cases with a material value of up to Rp500,000,000.00," reflecting a 250% increase from the previous limit (Bombing et al., 2021). Before this amendment, Article 1 point (1) of Perma No. 2 of 2015 limited the maximum material value of lawsuits to Rp200,000,000.00 with a simple examination and proof procedure. The increase in the value limit is intended to expand the number of civil cases that can be resolved thru the simple lawsuit scheme (Ramadhan, 2023).

Furthermore, Article 3 paragraph (2) regulates the categories of cases that do not fall under the simple lawsuit category, which states:

"Exclusions from the simple lawsuit category are:

- a. Cases whose disputes are resolved thru a special court as regulated by legislation; or
- b. Land rights disputes." (Syafitiani, 2023).

The determination of the material claim value below Rp500,000,000.00 does not automatically classify a case as a simple lawsuit. The determination of the qualification of a lawsuit is still carried out thru an assessment of several aspects, including the domicile of the parties, the substance and formulation of the lawsuit, the evidence submitted, and the fulfillment of other requirements as stipulated in the provisions regarding simple lawsuits. In addition to the aspect of the lawsuit's value, there are several other formal requirements. In principle, a simple lawsuit only involves one plaintiff and one defendant, unless there is a common legal interest that allows for more than one party. Both parties must be within the same jurisdiction as a residency requirement. The process cannot proceed if the defendant's address is unknown. In the event that the plaintiff is located outside the jurisdiction of the defendant, the plaintiff must appoint an incidental attorney or representative residing within the defendant's jurisdiction based on a letter of assignment from their institution. Furthermore, the personal presence of the parties in court is an obligation that must be fulfilled, with the availability of electronic court administration system facilities. (Hidayat, 2023).

Furthermore, the stages of resolving a simple lawsuit. has fundamental differences compared to the mechanism of ordinary civil lawsuits or conventional lawsuits. The stages of resolving a simple lawsuit are carried out thru several stages based on Article 5 paragraph (2) of Supreme Court Regulation No. 2 of 2015 on the Procedure for Resolving Simple Lawsuits, which states:

"The stages of resolving a simple lawsuit include:

- a. Registration;
- b. Examination of the completeness of the simple lawsuit;
- c. Appointment of the judge and designation of the substitute clerk;
- d. Preliminary examination;
- e. Setting the hearing date and summoning the parties;
- f. Hearing examination and reconciliation;
- g. Evidence presentation; and
- h. Verdict." (Harpami, et.al., 2024).

Based on Article 5 paragraph (3) of Supreme Court Regulation No. 2 of 2015 concerning the Procedure for Simple Lawsuit Settlement, which states, "Simple lawsuits are resolved no later than 25 days from the first hearing to the verdict."

Since the enactment of this Supreme Court Regulation, the Palangka Raya District Court has implemented the simple lawsuit mechanism as one of the forms of judicial services for the community seeking justice in the resolution of civil disputes. Based on empirical findings in the field, in the past two years, namely 2024 - 2025, a total of 40 simple lawsuit cases has been filed with the Palangka Raya District Court. Furthermore, data regarding the number of simple lawsuit cases handled during that period is presented in tabular form to provide a more structured and systematic overview.

Table 1. List of Simple Lawsuit Cases for 2024 - 2025

No.	Year	Number of Cases	Classification	
			Breach of contract	Unlawful Act
1.	2024	30 Cases	26	4
2.	2025	10 Cases	10	-

Based on the results of empirical research obtained thru case data studies and interviews with one of the judges of the Palangka Raya District Court who handles simple lawsuits, the judge stated that in principle, the Palangka Raya District Court has implemented the simple lawsuit mechanism in accordance with the provisions, particularly regarding the appointment of a single judge, scheduling of hearings, and stages of case examination.

The difference between *das sollen* as per the Supreme Court Regulation and *das sein* as seen in judicial practice indicates that a number of simple lawsuits are still resolved beyond the specified working days. Although the formal procedures have followed the applicable regulations and are generally considered more efficient and faster compared to ordinary civil lawsuits, in reality, not all cases can be resolved within the required timeframe.

As for various cases resolved thru the simple lawsuit mechanism, but whose handling process exceeded the 25 working days period since the first hearing, among others:

Table 2. Cases resolved thru the simple lawsuit mechanism

No.	Case No.	Classification	Long Process
1.	30/ Pdt.G.S/2024/ PN Plk	Breach of contract	43 days
2.	29/ Pdt.G.S/2024/ PN Plk	Unlawful Act	47 days
3.	25/ Pdt.G.S/2024/ PN Plk	Breach of contract	485 days
4.	10/ Pdt.G.S/2024/ PN Plk	Breach of contract	618 days
5.	7/ Pdt.G.S/2025/ PN Plk	Breach of contract	37 days
6.	5/ Pdt.G.S/2025/ PN Plk	Breach of contract	39 days
7.	2/ Pdt.G.S/2025/ PN Plk	Breach of contract	47 days
8.	1/ Pdt.G.S/2025/ PN Plk	Breach of contract	364 days

Based on the data, it can be understood that the Palangka Raya District Court has not yet fully demonstrated an optimal level of effectiveness in implementing the simple lawsuit mechanism as regulated by the regulations. The administration of justice should fundamentally adhere to the principles of simple, swift, and low-cost justice. It can be concluded that the implementation of these regulations at the Palangka Raya District Court has been carried out in accordance with the applicable procedures, but empirically, it has not yet been fully effective in ensuring the fulfillment of the deadline for resolving simple lawsuits as stipulated in those regulations.

Exceeding the deadline for resolving simple lawsuits is not only administrative in nature but also creates legal and factual implications that directly harm the plaintiff. Based on empirical data from the Palangka Raya District Court, there are simple lawsuit cases whose resolution processes far exceed the 25 working days deadline as stipulated in Article 5 paragraph (3) of Supreme Court Regulation No. 2 of 2015. For example, case No. 25/Pdt.G.S/2024/PN Plk was resolved in approximately 485 working days, while case No. 10/Pdt.G.S/2024/PN

Plk even took up to 618 working days from the first hearing to the issuance of the verdict. The lengthy resolution process has factually shifted the character of the simple lawsuit to resemble the mechanism of a regular civil lawsuit, thereby failing to optimally achieve the main objective of establishing the simple lawsuit as an instrument for quick, simple, and low-cost dispute resolution.

According to the Author's analysis, the delay in resolving simple lawsuits, which has reached more than 400 working days, causes significant losses for the plaintiffs, both legally and economically. From the aspect of legal certainty, the plaintiff is in a prolonged state of uncertainty regarding the fulfillment of their rights, because the decision that should have been obtained in a short time is instead delayed for a very long period. This situation has the potential to violate the principle of legal certainty, which is one of the main pillars in the judicial system. From an economic aspect, the plaintiff bears losses in the form of increased indirect costs, such as transportation costs, time costs, and the loss of potential economic benefits (opportunity loss) from the disputed object that should have been utilized if the decision had been obtained on time.

The occurrence of exceeding the deadline for case resolution indicates that the main objective of the simple lawsuit as an instrument for expediting the resolution of civil disputes has not yet been fully realized in judicial practice. This condition directly impacts the essence of the simple lawsuit mechanism, because if the resolution process takes almost as long or even exceeds the duration of a regular civil lawsuit examination, the strategic value of the simple lawsuit as a means of quick, simple, and efficient access to justice is at risk of losing its normative significance.

Factors That Become Obstacles in the Implementation of the Deadline for Simple Lawsuit Resolution at the Palangka Raya District Court

The enactment of this Supreme Court Regulation essentially brings new hope for the reform of the civil dispute resolution system. The regulation not only represents an innovation in judicial practice but also serves as a concrete embodiment of the application of the principles of simple, fast, and low-cost justice. (Mu'ala, 2025). This simple lawsuit aims to facilitate and expedite the legal process in resolving less complicated cases. The process of a simple lawsuit is usually shorter and the costs incurred are lower compared to a regular lawsuit. (Azhar, et.al., 2025). However, in its implementation, the regulation has not fully functioned as expected, as various obstacles still need to be addressed seriously. Therefore, concrete steps are needed to address the issues that arise in the implementation of the Small Claim Court, so that the mechanism can be carried out in line with its intended purpose, which is to provide easy access to legal services for the community seeking justice and to simplify and expedite the resolution of civil disputes that have been piling up at various levels of the judiciary. (Naefi & Latifiani, 2021).

Based on the research findings obtained thru in-depth interviews with judges handling simple lawsuit cases at the Palangka Raya District Court and an examination of case data recorded in the Case Tracking Information System (SIPP) of the Palangka Raya District Court, several main obstacles can be identified that cause the exceeding of the 25 working-day deadline for resolving simple lawsuits. According to the interview results with judges from the Palangka Raya District Court, the exceeding of the deadline for resolving simple lawsuit cases is more influenced by external factors beyond the court's control, especially those related to the parties involved and the factual conditions of the case. Several obstacles that frequently arise include the following:

- a. The absence of the parties at the first hearing necessitates the judges to postpone the trial for a rescheduled summons. Perma No. 2 of 2015 on the Procedure for Simple Lawsuit Settlement explains that if the plaintiff is absent at the first hearing, the lawsuit will be declared dismissed. If the defendant is absent at the first hearing, a proper summons will be issued. If the defendant is absent at the second hearing, the case will be decided. On the other hand, if the defendant attends the first hearing but does not attend the subsequent hearings without a valid reason, the case will be examined and decided in a contradictoir manner. (Falyafil & Baried, 2025). This condition causes the trial process to become longer because the stage that should have entered the reading of the lawsuit and the answer is delayed and can only be carried out in the next session after the re-summons is conducted properly and legally according to the law. The accumulation of time required for the re-summoning process, scheduling the next hearing, and coordinating with the bailiff to carry out the summons significantly extends the duration of case resolution beyond the ideal calculation of 25 working days. In addition to affecting the duration of case resolution, the re-summoning also results in the consequence of increased case costs, particularly the costs of summoning the parties involved.
- b. The low level of legal literacy and understanding of the parties regarding the procedures and mechanisms of the trial, especially for the defendant who is generally not accompanied by a legal counsel or advisor. Unlike the plaintiff, who is relatively more prepared because they have prepared the lawsuit, the defendant often finds themselves in a defensive position without adequate knowledge of the judicial system. The lack of understanding of the simple lawsuit procedure results in the trial process being less effective and efficient. The suboptimal implementation of the simple lawsuit

mechanism can be influenced by the low level of public understanding regarding the existence and function of the simple lawsuit as an instrument for resolving civil disputes. (Rosyid & Fikri, 2024). In practice, the parties, especially the defendant, experience fundamental confusion regarding the technical aspects of the trial, which are actually basic elements of civil procedural law. Based on the results of the interview with the Judge of the Palangka Raya District Court, the concrete issues frequently encountered include:

- 1) Lack of understanding regarding the mechanism for submitting an answer to the lawsuit. The defendant does not know that the answer must be submitted in writing, in a systematic format, and registered thru the court's registration desk. Many defendants mistakenly believe that the answer is sufficient if delivered orally in court without needing to be put in written form first.
 - 2) Ignorance regarding the procedure for submission and registration of documentary evidence. The parties, especially the defendant, do not understand that the documentary evidence to be submitted in court must first be registered with the substitute registrar, stamped appropriately, and made in duplicates according to the number of parties involved in the case plus one for the court's archive. As a result, it is not uncommon for the defendant to attend the trial with original documents without photocopies, or vice versa, bringing photocopies without the original documents for comparison.
 - 3) Confusion regarding which documents need to be photocopied and how many copies are required. The defendant often does not realize that each piece of documentary evidence must be prepared in sufficient copies, namely to be submitted to the opposing party, to the panel of judges, and for case archives.
 - 4) The inability to formulate an answer in the correct legal language. Many defendants come to court without any written response prepared at all, or only bring informal notes that do not meet the formal requirements of a response in civil procedural law.
- c. The defendant's attitude tends to be uncooperative, such as being evasive, reluctant to acknowledge obligations and responsibilities, and deliberately delaying the resolution of the case. In some cases, such actions are manifested by the defendant's absence in court, which could potentially harm the plaintiff.

Based on the description, the obstacles in the implementation of the deadline for resolving simple lawsuits at the Palangka Raya District Court are predominantly external factors, particularly low legal literacy and the uncooperativeness of the parties involved. This indicates that the effectiveness of simple lawsuits does not only depend on existing regulations but also on the readiness and legal awareness of the community as subjects seeking justice.

4. CONCLUSION

Based on the research findings, the implementation of Supreme Court Regulation No. 2 of 2015 juncto Supreme Court Regulation No. 4 of 2019 regarding the procedure for resolving simple lawsuits at the Palangka Raya District Court has fundamentally been in accordance with normative provisions, especially in the aspects of trial stages and the appointment of a single judge. However, in practice, the 25-working-day deadline for resolving cases since the first hearing has not been fully implemented consistently. This condition is influenced by various obstacles, including the absence of the parties, a lack of understanding of the simple lawsuit procedure, uncooperative attitudes, and administrative and technical barriers. The impact is that the goal of establishing the simple lawsuit mechanism as a means of quick, simple, and low-cost dispute resolution has not yet been optimally achieved.

In relation to this matter, improvements are needed both at the policy level and in implementation. The Supreme Court of the Republic of Indonesia needs to review the effectiveness of the 25 working-day deadline regulation by designing a clearer supervision system and legal consequences in case of violations, so that the provision is not merely administrative but also has binding force. On the other hand, the Palangka Raya District Court needs to strengthen case management and enhance the socialization of simple lawsuit procedures to the public in order to encourage a more cooperative understanding and participation, so that the principles of simple, fast, and low-cost justice can be realized more effectively.

5. REFERENCES

- [1] Azhar, Jaris Naufal, et.al., 2025, "Penyelesaian Perkara Perdata Di Pengadilan Melalui Proses Gugatan Sederhana Dalam Penyelesaian Sengketa Bisnis Menurut Peraturan Mahkamah Agung No. 4 Tahun 2019 Tentang Tata Cara Penyelesaian Gugatan Sederhana", *Rechtswetenschap: Jurnal Mahasiswa Hukum*, Vol. 2, No 2.
- [2] Bombing, Yudhi Satria, et. al., 2021, *Small Claim Court Dalam Penyelesaian Perkara Perdata*, Pusaka Almaida, Gowa.
- [3] Falyafil, Zakaria & Rizky Ramadhan Baried, 2025, "Implementasi dan Konstruksi Ideal Pengaturan atas Limitasi Waktu dalam Gugatan Sederhana", *Prosiding Seminar Hukum Aktual Fakultas Hukum Universitas Islam Indonesia*, Vol. 3, No. 6.
- [4] Firman Sumantri Era Ramadhan, 2023, *Mengenal Gugatan Sederhana Di Indonesia*, Inara Publisher, Malang.
- [5] Hidayat, Dudung, 2023, "Small Claim Court (SCC): Implementasi Dan Hambatannya Dalam Penyelesaian Sengketa Perdata", *Jurnal Pembangunan Hukum Indonesia*, Vol. 5, No. 3.
- [6] Harpami, Muhammad Ridho, et.al., 2024, "Penyelesaian Gugatan Sederhana Menurut Peraturan Mahkamah Agung No. 4 Tahun 2019 Tentang Perubahan Peraturan Mahkamah Agung No. 2 Tahun 2015 Tentang Tata Cara Penyelesaian Gugatan Sederhana Di Pengadilan Negeri Pelalawan", *Jurnal Ilmiah Wahana Pendidikan*, Vol. 10, No. 14.
- [7] Listyawati, Peni Rinda, 2021, "Small Claim Court: Principle Concretization In Lawsuit Settlement", *JPH: Jurnal Pembaharuan Hukum*, Vol. 8, No. 3.
- [8] Mu'ala, Abdulloh Afifil, 2025, "Tinjauan Hukum terhadap Mekanisme Gugatan Sederhana di Pengadilan Agama: Perspektif Asas Sederhana, Cepat, dan Biaya Ringan", *TARUNALAW: Journal of Law and Syariah*, Vol. 3, No. 2.
- [9] Muhaimin, 2020, *Metode Penelitian Hukum*, Mataram University Press, Mataram
- [10] Mumek, Pinkan Syerina, et.al., 2024, "Implementasi Gugatan Sederhana (Small Claim Court) Di Pengadilan Negeri Manado", *Jurnal Fakultas Hukum (Lex Crime)*, Vol. 12, No. 5.
- [11] Naefi, Mohammad dan Dian Latifiani, 2021, "Akibat Hukum Putusan Gugatan Sederhana Tidak Dijalankan bagi Para Pihak", *Pandecta*, Vol. 16, No. 2.
- [12] Peraturan Mahkamah Agung (PERMA) No. 2 Tahun 2015 tentang Tata Cara Penyelesaian Gugatan Sederhana diundangkan dalam Berita Negara Republik Indonesia Tahun 2015 No. 1172.
- [13] Peraturan Mahkamah Agung (PERMA) No. 4 Tahun 2019 tentang Perubahan atas Peraturan Mahkamah Agung No. 2 Tahun 2015 tentang Tata Cara Penyelesaian Gugatan Sederhana tercatat dalam Berita Negara (BN) Tahun 2019 No. 942.
- [14] Purnawati, Erna, 2020, "Penerapan Gugatan Sederhana (Small Claim Court) Dalam Penyelesaian Perkara Wanprestasi Di Pengadilan Negeri Selong", *JURIDICA*, Vol. 2, No. 1.
- [15] Putra, Agus Iskandar Pradana, 2023, "Penyelesaian Gugatan Sederhana (Small Claim Court) Guna Mewujudkan Asas Peradilan Sederhana, Cepat dan Berbiaya Ringan Di Era Globalisasi" *Jurnal Tana Mana*, Vol. 4, No. 1.
- [16] Riskawati, Shanti, 2018, "Peraturan Mahkamah Agung No. 2 Tahun 2015 Tentang Tata Cara Penyelesaian Gugatan Sederhana Sebagai Instrumen Perwujudan Asas Peradilan Sederhana, Cepat Dan Biaya Ringan", *Veritas et Justitia*, Vol. 4, No. 1.
- [17] Rosyid, Aisyah Nanda & Abdullah Fikri, 2024, "Analisis Urgensi Perubahan Peraturan Gugatan Sederhana Perma No. 4 Tahun 2019", *HUKMY: Jurnal Hukum*, Vol. 4 No. 2.
- [18] Sinaga, Yosua, et.al., 2025, "Efektivitas Gugatan Sederhana Dalam Penyelesaian Sengketa Wanprestasi", *Jurnal Hukum Justice*, Vol 3, No. 1.
- [19] Syaftiani, 2023, "Penyelesaian Gugatan Perkara Sederhana di Pengadilan Negeri Tebo", *Zaaken: Journal of Civil and Bussiness Law*, Vol. 4, No. 2.
- [20] Wibowo, Seno Adhi dan Massulthan Rafi Wijaya, 2021, "Implementation of the Small Claims Court in Dispute Case Settlement in Indonesia", *Lex Scientia Law Review*, Vol. 5, No. 1.
- [21] Zaini, Zulfi Diane, et. al., 2023, "Analisis Yuridis Kekuatan Hukum Tetap (Inkracht Van Gewijsjde) Terhadap Putusan Gugatan Sederhana Wanprestasi Di Pengadilan Negeri Tanjung Karang Kelas Ia (Studi Putusan No.: 4/Pdt.Gs/2022/Pn Tjk)", *Jurnal Rectum*, Vol. 5, No. 1.