

The Urgency of Gender Equality in Indonesian Customary Inheritance Law: Review and Comparison with Other Countries

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ARTICLE INFO	ABSTRACT
<p>Keywords: Inheritance Law; Traditional Inheritance Law; Gender Equality</p> <p>How to cite: Aulia Farah Nizrina., Et., Al. (2025). The Urgency of Gender Equality in Indonesian Customary Inheritance Law: Review and Comparison with Other Countries. <i>Veteran Law Review</i>. 8(1). 106-117.</p> <p>Received:2025-04-22 Revised:2025-08-14 Accepted:2025-08-16</p>	<p>The kinship system used in Indonesia, especially in customary inheritance law, is considered to have the potential to result in gender inequality because the distribution of inheritance given is considered unfair, especially implemented in the modern era like now. Therefore, the purpose of this study is to analyze the application of inheritance law in Indonesia and examine the views of customary inheritance law on gender equality, as well as a comparison of its application in other countries. The researcher used a normative legal method by conducting a literature review. The results of the study show that Indonesia applies patrilineal, matrilineal, and bilateral systems in the customary inheritance law kinship system. In practice, the patrilineal and matrilineal systems are considered less appropriate in terms of inheritance distribution because they use a system of drawing the father's or mother's lineage or can be said to be based on gender. If we look at the systems used by other countries, it seems that they are also inseparable from systems that end up ignoring gender equality.</p>

1. Introduction

Each region in Indonesia has a group of people who have inhabited the area since centuries ago and each has its own characteristics. This community group is a structured unit, behaves as a unit, settles in certain areas, has rulers, implements customary law, and has wealth in the form of tangible and intangible objects. They also manage and control the natural resources within their reach (Siti Hapsah Isfardiyana, 2018). Leon Duguit argues that the law can be discussed when the behavior of members of the community at a certain time is respected by the community as a guarantee of the common interest, and if there is a violation of this behavior, there will be a general reaction from the community to the violator (Dominikus Rato, 2015). The law itself has a function as a regulator or guideline. Of course, in community life, a rule is

needed to order the social life that they run in various aspects such as having a family, making a promise, or even transferring inheritance.

Inheritance law is an aspect of civil law that focuses on the arrangement of property in a family context. This field regulates the process of transferring the inheritance of deceased persons and the legal consequences that arise for the heirs who are left behind. This includes relationships between family members as well as interactions with third parties (Dwi Ratna Kartikasari, 2021). Indonesian society as a heterogeneous society with cultural diversity has the impact of creating implications for different people's life dynamics, especially in the distribution of inheritance. According to legal experts, the issue of inheritance and inheritance law arises when there are three important elements: First, a person has died; Second, there are property that is left behind; and Third, there are heirs.

Indonesia as an archipelagic country creates various forms and systems in the distribution of heritage in its community. In an effort to draft a national law that is able to meet the needs of the Indonesian people, both now and in the future, as well as to create a just and prosperous society based on Pancasila and the 1945 Constitution, it is important to understand the legal concepts and principles rooted in customs. Customary law plays a crucial role as an important source in the development of national law, which aims to unify the legal system through the formation of laws and regulations. National law reflects the culture of a nation, because basically the law is a manifestation of the nation's intelligence that grows from the legal awareness of its people. Therefore, law should function as a mirror of a nation's culture (Mita Yuliana, 2023). One aspect of family law is customary inheritance law which has a significant role in reflecting the system and form of law that applies in a certain community or region, because it is closely related to various aspects of human life in it (Iqbal Hutagalung, 2024).

Customary inheritance law is a rule or legal norm that regulates how inheritance, both material and immaterial, is distributed or passed on to the heirs from one generation to the next, through certain procedures and ways in the transition process (Dewi Wulansari, 2014). R. Soepomo said that the process of transferring inheritance can actually start from the time the owner of the property is still alive and continues until his descendants become new independent families or commonly called "*mentas*", which finally gets its turn to pass on the inheritance by process to the next generation or descendants (Dewi Wulansari, 2014).

A common problem in inheritance distribution is inheritance division by gender, especially for girls. The distribution of inheritance in various regions in Indonesia varies, depending on the applicable system. This difference certainly affects the distribution of inheritance to heirs. For

example, in the Minangkabau and Semando customs, which adhere to the matrilineal system, girls have a greater priority of inheritance rights than boys. In contrast, in Javanese, Madurese and Bugis societies, which adhere to a bilateral system, boys and girls have equal rights in terms of inheritance. In the Lampung and Batak communities, which adhere to the patrilineal system, boys have greater inheritance rights than girls. These three systems cannot be separated from the current Indonesian legal system, which includes matrilineal, patrilineal, and bilateral systems (Amalia Desi, 2023). The formation of customary inheritance law in a community is greatly influenced by these three kinship law systems, which also affect the distribution of inherited property, therefore, when discussing inheritance issues, it is also necessary to discuss the kinship system and marriage law that apply in society. Although Indonesia recognizes these three systems, in reality power in general remains in the hands of men. This is due to the influence of patriarchal ideology that is still valid in Indonesian society (Amalia Desi, 2023).

The matrilineal and patrilineal kinship system can be said to be a system of inheritance distribution based on the gender of the heirs. With the enactment of this system, of course, it creates a sense of injustice for heirs who do not get a share of the inheritance. In addition, judging from gender equality, it looks very unfair and discrimination against heirs who are not given the slightest opportunity to contribute to inheritance issues, both material and non-material. In fact, female and male children or heirs should have the same role and position in the distribution of inheritance and the continuity of the lineage. However, the family system determines how family and social life is arranged in each family system (Suryanata, 2021).

2. Method

The researcher uses normative juridical methods in research or usually called doctrinal law research, which is a method that focuses on investigating the application of legal norms or positive rules that are applied and associated with the enforcement of gender justice in customary inheritance law in Indonesia. Therefore, the researcher uses data collection techniques in the form of library data such as journals, books and applicable laws and regulations that are related to the discussion to be researched. In addition, this study uses comparative techniques between civil inheritance law, Islamic inheritance law and a compilation of customary inheritance law related to the granting or distribution of inheritance in Indonesian society. This method as much as possible to give an idea to the reader through the methods used. This Method are optional, only for original research articles.

3. Main Heading of the Analysis or Results

3.1 Application of Inheritance Law in Indonesia

Inheritance law is a part of civil law as a whole and is the smallest aspect of family law. This law is closely related to human life, as everyone will inevitably face the event of death. The legal consequences that arise after a person's death include issues related to the transfer and transfer of the rights and obligations of the deceased person. The process of settling these rights and obligations is regulated in inheritance law. However, until now, both Indonesian legal experts and the Indonesian legal literature have not reached an agreement on the definition of inheritance law, so the terms used for inheritance law are still diverse (Sigit Sapto Groho, 2016).

Currently, there are three systems of inheritance law that apply in Indonesian society, namely civil inheritance law, Islamic inheritance law, and customary inheritance law. Civil inheritance law is regulated in Book II of the Civil Code (KUHPPerdata), namely Articles 830 to 1130. Civil inheritance law is the most commonly applied inheritance law in Indonesia and has several provisions that are in line with Western customary law. The inheritance can be made by the heirs listed in the will or by the blood family or household such as children, parents, siblings, grandparents, and other descendants. The principle applied in this type of inheritance law is an individual system, which means that each heir is entitled to receive a share of the inheritance according to his or her own rights. If you use a will, then only the party named in the will is entitled to become an heir (Diana E. Rondonuwu, 2019).

In general, customary law is an unwritten law and most of it comes from the customs of the community, while some of it comes from Islamic law. Thus, customary law can be considered as the original law of Indonesia that is not recorded in the form of legislation. More specifically, customary inheritance law is a part of customary law that regulates provisions and rules regarding the transfer of property, its principles, inheritance, heirs, heirs, and transfer procedures. The transfer of property in customary inheritance law can occur both as long as the heir is still alive and after death. Regarding who is entitled to receive inheritance according to customary law, this depends on the customary system adopted by the community. Indonesia adheres to two commonly adhered family systems, namely bilateral and unilateral systems. In a society with a bilateral (parental) system, both boys and girls have the right to receive inheritance. Meanwhile, in a society that adheres to a unilateral system, only one lineage is entitled to inheritance, it can be a male (patrilineal) or female (matrilineal) lineage (Maimun Nawawi, 2016).

The patrilineal kinship system basically follows the lineage of a father or male side. In this structure, married couples, especially a wife, are usually separated from their family environment, including their parents, ancestors, siblings, and all of their relatives. After marriage, the wife becomes part of her husband's family group. The same applies to the children of the marriage, except for married daughters, who will also join her husband's kinship circle (Sigit Sapto Groho, 2016).

In contrast, the matrilineal system follows the maternal lineage, taking the lineage of female ancestors, who ultimately believe that they all come from the same mother. In societies that apply this system, marriage is known as *sumendo* marriage, where the woman invites the man to join the wife's family. However, the husband still lives with his mother's family and is not part of the wife's kinship. The children in this marriage will be part of the mother's relatives or follow the mother's lineage. In this case, the father has no authority over his children, and if the husband or father dies, neither the wife nor the children can inherit his inheritance (Sigit Sapto Groho, 2016).

The Qur'an and hadith as the most important source of Islamic law clearly and firmly regulate Islamic inheritance law. However, there is still a possibility of variation in the way of division, the number of shares, and who is entitled to receive the inheritance, which can be influenced by local traditions and wisdom. Therefore, the application of Islamic inheritance law always adds various new discourses that continue to develop in the study of Islamic fiqh. Thus, it is very important to formulate a law that is normative. In Indonesia, Islamic inheritance law has been recognized as a part of the positive law applied by judges in religious courts to resolve inheritance-related disputes (Maimun Nawawi, 2016). Inheritance law in Islam plays an important role in people's lives with the aim of regulating and protecting the ownership of certain individuals or groups. This law serves as a preventive measure to prevent conflicts in the family regarding the distribution of inheritance. For this reason, the regulations regarding Islamic inheritance law are drafted very clearly and in detail, including who is entitled to receive inheritance and who is not, as well as how much should be received by each according to the instructions set by Allah. The parts cannot be changed, either added or subtracted in the slightest, except in certain cases where they are specially divided (Maimun Nawawi, 2016).

3.2 Customary Heirs' Legal Views on Gender Equality

The inheritance distribution system in Indonesia still often reflects gender inequality. Although there have been some changes in the law to improve gender justice, traditional practices still dominate. Legally, women should have the same rights as men in obtaining a share of the

inheritance. However, in reality, social and cultural pressures often lead to women getting a smaller share or even being ignored. This paradigm shift requires an active role from the government, community institutions, and society itself to ensure recognition and respect for women's rights in the distribution of inheritance (Aunilla & Inayah, 2023).

In societies that adhere to the patrilineal and matrilineal systems, where kinship ties are still very strong, the inheritance of customary positions or positions includes rights and obligations as members who are responsible for maintaining customary order, regulating customary events and ceremonies, and using customary tools and buildings. In addition, these rights and obligations also include the role of leaders in the group of descendants, heads of relatives (who are jointly managed), and managing customary property, including land owned by relatives. This role also includes the function of mediating in the settlement of customary kinship disputes. In terms of customary heritage management, the customary heirs must be responsible to their kinship deliberations (Sigit Sapto Groho, 2016).

The patrilineal and matrilineal systems when viewed from the perspective of justice, especially in terms of the position between men and women, especially in the current era of modernization and emancipation, are considered irrelevant and no longer appropriate. This is because in the system it is seen as if they favor each other's genders. The patrilineal system as a system that follows the lineage from the father's or male side based on its history, men are considered as the backbone of the family in their new family in the future, then considered as those who can be responsible and wise and have a greater burden than women, so they are considered worthy of greater inheritance rights than women. Likewise, the matrilineal system is a system that follows the lineage from the mother's side, while men will only act as supervisors of the property belonging to their sisters or their wives, but do not have the right to inherit property. Although in practice some tribes adhere to the matrilineal system (lineage through women), women have inheritance rights, in reality, these rights are often limited. For example, in some matrilineal communities, women may inherit family land or property, but important decisions regarding such property are still in the hands of men, such as uncles or brothers, who are considered the head of the family.

Of course, this system can be seen from several gender sides so that it needs to give rise to a perspective of gender injustice. However, if we look at the background or reason behind the difference in treatment or discrimination against the girl, then we can understand it. Logically, it is due to the view that after marriage, the daughter is considered no longer part of the relatives, since her ties to the family are severed through the so-called honest payment by her future husband. Thus, the girl is considered

not entitled to inheritance. However, in practice, and because of dissatisfaction with this system of inheritance law, a father may give or grant a piece of agricultural land or livestock to his daughter, whether married or not (Sigit Sapto Groho, 2016).

Gender equality is very important in this context, especially for women. Without equality, discriminatory practices in inheritance sharing can continue, harming women and exacerbating inequalities in society. The impact received by women is greater than that of men, including:

a. Women's Economic Marginalization

One of the main impacts of gender inequality in customary inheritance law is the economic marginalization of women. In many customary law systems in Indonesia, women often do not get the same inheritance rights as men, especially in relation to land and property. Without equal access to economic resources such as land, women often have difficulty obtaining income or capital to improve their families' living standards. As a result, women tend to rely on husbands or male family members to meet their economic needs. In addition, Inequality in inheritance rights limits women's ability to make important decisions in the family or society. Without control over assets or wealth, women often have no role in major decision-making, such as natural resource management, family investments, or family economic direction. This prevents women from achieving greater personal and social autonomy.

b. Dependence on men

In societies that apply discriminatory customary inheritance laws, women are often trapped in social and economic dependence on men. Since they do not have direct access to inheritance, women must rely on husbands, fathers, or brothers to acquire their rights to property or land. This situation increases her vulnerability, especially at critical moments such as divorce, the death of a husband, or the inability of male family members to provide support.

c. The Spread of Inequality in Society

Gender inequality in inheritance results in a pattern of injustice that is passed on from one generation to the next. If women are not given equal rights in inheritance, this will continue in the next generation, creating a cycle of inequality in the family and society. As a result, the gender gap in society can further worsen the situation, as well as hinder the realization of inclusive and sustainable social development.

d. A Widespread Impact on Women's Quality of Life

Without the right to inheritance, women often do not have access to property or land that could improve their quality of life, such as for agricultural or residential purposes. This inequality can cause women to be trapped in poverty or prolonged economic hardship, as they are unable to take advantage of the economic potential that could otherwise

be gained from inheritance. In addition, gender inequality has a negative impact on the economic growth of a country or region. Inequality in education contributes to low productivity of human resources, which in turn hinders economic growth. This impact directly affects economic growth through the quality of human resources and labor productivity, which ultimately leads to a decline in the health of the country's economy (Agnes Vera Yanti Sitorus, 2016).

e. Declining Land Ownership in Women's Families

Land is one of the main resources in many indigenous peoples in Indonesia. If women do not inherit land, this can lead to a reduction in the amount of land owned by women in their families. As a result, women's assets decline, impacting their ability to manage the family economy, maintain their livelihoods, and reduce their vulnerability to economic crises.

f. Hindering the Progress of Social and Economic Development

Gender inequality in inheritance can hinder the progress of social and economic development, as women, as an important part of society and the economy, cannot participate to the fullest. Without an equal right to resources, women's potential to contribute to economic development through asset management and improving their quality of life is severely limited. This in turn affects the productivity of the community as a whole.

Equal rights for men and women in receiving inheritance not only reflect the principle of justice, but also support sustainable social and economic development. Gender equality in inheritance distribution can give women greater access to economic resources, strengthen their position in society, and help break the cycle of poverty. Therefore, promoting gender equality in inheritance sharing is a step that is not only moral, but also crucial to achieving inclusive and sustainable social development (Sigit Sapto Groho, 2016).

The relationship between customary inheritance and gender equality is evident in the way communities organize and carry out inheritance distribution. The customary inheritance system that prioritizes gender equality reflects the principle that men and women have equal rights in receiving inheritance. When cultural norms support the equal roles and contributions of both sexes, the division of customary inheritance can serve to recognize the value and role of women in society. The process of inheritance sharing that involves the active participation of both men and women in decision-making opens up space for dialogue and mutual agreement, which ultimately strengthens gender equality within traditional frameworks. However, social changes and external influences can influence these dynamics, so it is important to understand the cultural and historical context of a society to see how the relationship between

indigenous inheritance and gender equality develops (Aunilla & Inayah, 2023).

3.3 Distribution of Inheritance in Other Countries

The distribution of inheritance in different countries also experiences inequality, especially related to gender. Although some countries have made great progress in gender equality, inheritance systems in many cultures still show inequality, especially in women's right to inherit family property or assets. Inequality in inheritance distribution persists in many countries despite efforts to achieve gender equality through legal and social changes. In many situations, differences in the treatment of women in terms of inheritance are strongly influenced by culture, religion, and traditional interpretations of women's roles in the family. Although laws in various countries now provide more equal rights, the application of such equality is often hindered by social norms and customs that have existed for a long time in society.

Although India's national laws, particularly the Hindu Succession Act 1956, have given women equal rights in terms of inheritance, their implementation still faces various obstacles. In many communities, especially those that uphold traditional social norms, women are often denied equal rights in inheritance of land or family property. In many cases, women are considered to have no rights to land, and inheritances are usually given to boys. In addition, strong patriarchal norms often prevent women from utilizing or managing the inheritance they receive. Foreign populations of Eastern descent, including Indians, follow a pattern of inheritance rooted in the customary laws of their region, a region where the majority of the population applies a patrilineal kinship system, a law of inheritance that is different from that found in Western traditions. While Western inheritance law provides equal rights for men and women, in the context of Indian customary law, there is no concept of a legal share of inheritance, as the people there refer to the prevailing local customary rules (Zuliyanti, Dwiyana Achmad Hartanto, 2023).

Eastern countries or Islamic countries in carrying out the distribution of their inheritance based on Islamic sharia. Saudi Arabia is a country that does not regulate its inheritance law through national laws, but refers to the Qur'an and As-Sunnah in resolving inheritance problems (Ibnu, 2017). In addition, Saudi Arabia adopts an inheritance law system based on the Hanbali School, one of the four schools in Sunni Islamic jurisprudence. This system emphasizes the principle of equal rights between men and women in terms of inheritance. However, according to the old law, there was a difference in the distribution of inheritance between the two, where men generally received twice as much inheritance as women. Although

some changes in the law have been made to give women greater rights, cultural practices and religious interpretations still hinder the implementation of gender equality in inheritance (Muhammad Husni Abdullah Pakarti, 2023). Similarly, in Pakistan, although there are laws that support equality in inheritance, as stated in Pakistan's Muslim Personal Law, the reality is that women are often hindered by social and cultural practices. In many rural areas or conservative communities, women may not be given full access to family inheritance, and in some cases, women's inheritance rights may be ignored. Even when women are given a share of the inheritance, they are often forced to give up those rights or are unable to manage the inherited property. Afghanistan is another example where women face inequities in inheritance. In more conservative and rural societies, women are often not allowed to inherit family property or land. Even if there are laws in favor of women's inheritance rights, social and cultural norms often prevent women from obtaining these rights, and they often have only a small or no right to a share.

The United States is known as a country that values equality, where every individual is given an equal opportunity to acquire, use, and maintain their private property rights. While there is no clear legal discrimination against women in terms of inheritance, economic and social inequality can affect the distribution of inheritance, especially in families that own many assets or property. In some cases, gender inequality in terms of property control, income, and roles in the family can affect how inheritance is shared in practice. In some states, inheritance laws tend to favor men more, and this can exacerbate economic inequality for women. For women in America, it is not easy to obtain equal rights and opportunities as men. Gender is often an obstacle to achieving equality and results in unfair treatment. Although women in America are entitled to be appointed as inheritors, executors, and trustees of wills, this status is not always on par with that of men. This is due to the fact that these positions are strongly related to the rights, responsibilities, expectations, and relationships between women and men, whose gender perspectives are more influenced by their social roles as wives and husbands, as well as girls and boys (Tatit Hariyanti, 2011).

4. Conclusion

The United States is known as a country that values equality, where every individual is given an equal opportunity to acquire, use, and maintain their private property rights. While there is no clear legal discrimination against women in terms of inheritance, economic and social inequality can affect the distribution of inheritance, especially in families that own many assets or property. In some cases, gender

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