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## The Role of Advocates in Handling Divorce Cases When the Plaintiff Is Not Present at The Decision Hearing

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**Abstract:** In the context of family law, the presence of a competent advocate is essential to represent and protect the interests of the plaintiff. The advocate serves as the legal representative in court and ensures that the entire legal process runs smoothly and fairly even in the absence of the plaintiff. The advocate's duties consist of attending the judgment hearing, recording the contents of the judgment, communicating the result to the plaintiff and providing legal advice regarding the next steps to be taken including the filing of an appeal. Not only does this involve aspects of legal representation, but also the management of communication between the plaintiff and the court and the preparation of relevant documents. The results show that the role of advocates is essential in the legal process, providing certainty and protection of rights for plaintiffs and ensuring a fair and transparent legal process.

**Keywords:** The Role of Advocates, Divorce Cases, Absent Plaintiffs.

### 1. INTRODUCTION

Marriage is a fundamental institution that not only maintains human survival, but also upholds honor, dignity, and the pursuit of happiness. It is a lifelong commitment, not a fleeting endeavor, which necessitates thorough preparation to ensure its implementation aligns with the true purpose of marriage. The process of marriage requires various preparations, both practical and emotional, to create a strong foundation for a lasting and fulfilling union. Every marriage aspires to physical and emotional happiness, but there are numerous internal and external factors that can hinder or prevent this happiness, ultimately leading to divorce. These factors may include financial strain, poor communication, lack of intimacy, infidelity, interference from family or friends, and unresolved conflicts, among others. Overcoming these challenges requires a commitment to mutual understanding, compromise, and a willingness to seek professional help when necessary to maintain a healthy and fulfilling marriage. In Indonesia, the divorce process is not just a relationship breaker, but also a complex settlement of rights and obligations between the two parties involved. Nowadays, while divorce is becoming increasingly common in Indonesian society, with a steady rise in the number of divorce cases each year, it is still not as widespread as it once was. This is because divorce in Indonesia is regulated by Law Number 1 of 1974 concerning marriage, which stipulates that married couples who want to divorce must have clear and justifiable reasons in accordance with article 39 paragraph 2 of the Marriage Law. The divorce process, therefore, encompasses not only the dissolution of the marital bond, but also the equitable distribution of assets, alimony, and other legal considerations between the spouses.

Divorce cases are increasing in most cities in Indonesia, and the causes of divorce vary widely (Nurhayati & Siregar, 2019). The main cause of dissatisfaction in marriage can stem from economic problems, interpersonal conflicts, or incompatibility that arise after marriage (Nurhayati & Siregar, 2019). The significant rise in divorce rates in Indonesia is also influenced by the widespread use of technology, which can contribute to marital problems. For example, in the case of Situbondo,

technology had contributed to the high number of divorces, including the prohibition of using cellphones and playing Facebook, and among the cases, 80% of women have sued for divorce. (Rokan et al., 2020) Similarly, in Makassar, the data from the Makassar Religious Court showed that the number of divorces from January to October 2018 reached 1,728. (Latifah & Ritonga, 2022)

While the divorce process in Indonesia is regulated by law, the underlying factors contributing to the rise in divorce rates are complex and multifaceted (Nurhayati & Siregar, 2019). Addressing these factors requires a comprehensive approach that considers the legal, social, and cultural aspects of marriage and divorce in Indonesian society. In this divorce case, an advocate can help to resolve the case. An advocate who carries out their profession as a high law enforcer and trusted legal service provider, as defined under Law number 18 of 2003 (Abyta et al., 2022) (Kasim & Semiaji, 2022). Advocates are people who work as legal service providers inside or outside the law, and they are also referred to as lawyers, legal consultants, or legal advisors (Aziz, 2019). Advocates are responsible for providing legal guidance, negotiating on behalf of their clients, and representing them in legal proceedings. They play a crucial role in ensuring that the legal rights and interests of their clients are protected throughout the divorce process. Advocates play a crucial role as legal advisors in divorce cases. They provide clients with comprehensive information on legal procedures and assist them in formulating the best strategy to achieve the desired and agreed settlement. (Emery, 1995) (Kressel et al., 1978) (Louw et al., 2004) Advocates will typically encourage their clients to mediate before taking the case to court, as this can help to ease the tension and conflict that often arises between couples seeking a divorce. Through effective communication and negotiation, advocates work to facilitate a more amicable resolution, guiding their clients through the complex legal process and protecting their rights and interests throughout the proceedings. Advocates can help resolve a case or dispute through negotiation or in a conciliatory manner. However, it is strictly prohibited for advocates to guarantee to their clients that the case or matter they are handling will be won or is certain to win (Aziz, 2019) (Nuna et al., 2020) Advocates cannot make such assurances, no matter how skilled they may be, as the outcome of a case ultimately cannot be guaranteed. It is strictly prohibited for advocates to guarantee to their clients that the case or matter they are handling will be won or is certain to win, even if it is just to entertain the client. This is because no matter how good an advocate is, they still cannot determine or guarantee the outcome of a case (Purnomo & Dewi, 2023). Thus, this research aims to explore more deeply the role of advocates in resolving divorce cases and the challenges they face in this process. It is hoped that the results of this research can provide better insight and knowledge regarding the importance of the role of advocates in the divorce process, as they play a crucial part in navigating the legal complexities and protecting the rights and interests of their clients throughout the proceedings.

Based on the above background, the author is interested in analyzing the role of advocates in handling divorce cases and the effects that the plaintiff's absence or non-participation can have on the decision-making process during divorce proceedings. This research aims to explore more deeply the role of advocates in resolving divorce cases and the challenges they face in this process. It is hoped that the results of this research can provide better insight and knowledge regarding the importance of the role of advocates in the divorce process, as they play a crucial part in navigating the legal complexities and protecting the rights and interests of their clients throughout the proceedings.

## 2. LITERATURE REVIEW

In resolving a divorce case a lawyer can use several legal theories related to the case. Advocates have a major role in resolving divorce cases even when the plaintiff is not present at the trial. When the plaintiff is absent, the advocate will play a role as it should, namely in accordance with Law number 18 of 2003. Usually, the advocate will carry out advocacy activities, namely defending and fighting for the rights of his client's rights based on the current legal rules (Zai et al, 2022). The advocate will also help the client to determine the cause of the divorce, and the client's cause of divorce must be in accordance with legal regulations to be accepted. The client and the advocate will also work together

to gather evidence. This is very important even if the client is not present. Advocates can settle divorce cases with some of the following steps or strategies, namely:

- a. Legal Services: Provides legal advice and explains what rights the client has and suggests an amicable settlement before filing a lawsuit in court.
- b. Negotiation and Mediation: seeking/attempting to bring peace to both parties, including consultations and subpoenas.
- c. Court representation: If an amicable settlement fails, the advocate will take the client to court, file the necessary documents and defend the client's interests.

There are two methods used by lawyers in resolving divorce cases in Indonesia, namely:

- a. Mediation: Mediation is an initial alternative or first step taken before going to court or trial. It focuses on peaceful resolution, allowing both parties to reach an agreement.
- b. Court: Court settlement is the final step or the last resort if mediation is unsuccessful. In court the result is that one of the parties will win.

Since the birth of Law No. 18/2003 on advocates, legal aid can only be provided by advocates, either individually or who are members of professional organizations until the judicial review. After the Constitutional Court annulled Article 31 of Law No. 18 of 2003, advocates are not the only legal aid providers (public defenders). Based on the Constitutional Court's decision, anyone can provide legal aid if they have expertise in the field of law but are still given several requirements and various regulations. There are various legal aid providers in Indonesia, and they are classified as follows:

- a. Advocates who are members of an advocate organization and are also members of the Legal Aid Institute (LBH).
- b. Advocates who are members of an advocate organization and are not members of LBH.
- c. Advocates who act as legal counsel of a company.
- d. Advocates who are not members of any association.
- e. Practicing lawyer or pokrol.
- f. Undergraduate law graduates who work in legal bureaus / government agencies.
- g. Lecturers and students of the Faculty of Law.
- h. Legal consultant.

At present, legal aid is only regulated in Article 22 paragraph (1) of Advocates Law Number 18 of 2003 concerning advocates which reads: "Advocates are obliged to provide legal aid only to poor justice seekers", in Article 1 paragraph (9) states "Legal aid is a legal service provided by an advocate only to clients who cannot afford it".

### 3. RESEARCH DESIGN AND METHOD

The research method employed in this study is a scientific technique carried out systematically using certain procedures to answer hypotheses or research questions and produce new knowledge that can be tested. Through this writing, the author uses normative research methods to be able to understand and further analyze the role of advocates in handling divorce cases and the effect of the plaintiff's absence in making decisions. This approach focuses on analyzing legal texts, case studies, and relevant literature to gain a comprehensive understanding of the research topic.

The findings of this study indicate that advocates play a crucial role in divorce cases, particularly in navigating the legal complexities, protecting the rights and interests of their clients, and facilitating a more amicable resolution through negotiation and mediation. Advocates are responsible for providing

their clients with comprehensive legal guidance, assisting in formulating the best strategy, and representing them in legal proceedings.

## 4. RESULT AND DISCUSSION

### 4.1. *The Role of Advocates in Handling Divorce Cases*

Divorce is a very possible thing in a marriage and can occur due to many factors. Divorce is a legal process that ends the marital bond between husband and wife which usually involves several matters such as the division of joint property, child custody and other related matters. In resolving divorce cases can be assisted by an advocate, and an advocate will carry out his profession as a high law enforcer based on Law number 18 of 2003. Law enforcement is a step to adjust between values, rules and real behavior patterns that aim to create peace. Advocates are lawyers who have the task of assisting litigants as suspects or defendants in criminal cases, while in civil cases the term advocate or lawyer is used as legal counsel for the plaintiff or defendant. Advocates are a profession that has been highlighted by the public because many people think that this profession has a lot of twisting of facts, even though it is only done by a few individuals. There are still many advocates who work with an idealistic vision and work according to their conscience. As an advocate is also required to have a foundation of knowledge in the field of law, namely through the education path that must be taken.

According to Law number 18 of 2003 concerning Advocates, the definition of an Advocate is a person who has the qualifications to provide services in the field of law and is responsible for resolving various legal problems faced by his/her clients, both in litigation and non-litigation. In the Indonesian Advocate Code of Ethics (KEAI) 2002 precisely in Chapter 1 article 1 letter a defines an advocate as an individual advocate who practices professionally providing legal services in court or outside the court. Every advocate has the duty to carry out activities, namely an activity or effort carried out by a person or group of people to facilitate and fight for the rights or obligations of a client, person, or group based on applicable law. Advocacy activities are activities or efforts made by an advocate or legal advisor to carry out the principles of truth, the principle of legal certainty, equality before the law, to fight for the rights and obligations of the assisted party (his client) in order to realize the equality of rights and obligations of each party. Therefore, the role of advocates must stick to the principle of serving clients with full responsibility regardless of anything, because professionalism is the most important standard for advocates so there should be no discrimination that harms all parties. There are several factors that lead to divorce:

- a. **Divorce Due to Economic Factors**  
Economy is the most important and influential thing in a marriage. A stable economy is needed in marriage in order to have a sense of security in living everyday life because it is necessary to fulfill daily needs. When married in an unstable economic situation, it can cause conflict in the future. Economic factors can start from the husband who cannot meet household needs and the absence of a permanent job so that income for the household is unclear.
- b. **Divorce Due to Poor Communication Factors**  
Communication is very important in a marriage, because with good communication, couples can understand each other and understand each other's desires. Without good communication, couples will find it difficult to understand each other's needs, expectations and feelings. The distance between spouses can also cause poor communication; this happens to couples where one of them works abroad. Poor communication between couples starts with the inability to convey one's own feelings to one's partner. This will lead to more complex conflicts.
- c. **Divorce Due to a Third Person or Infidelity**  
When a husband or wife has a special relationship with someone else in the form of text messages to adultery, namely having sex, it is called infidelity. And infidelity is definitely damaging to the marriage they have built. The presence of a third person in a marriage can undermine the trust

of the couple, create emotional pain, can break commitments and promises and marital commitments.

Advocates can play a role in litigation and non-litigation. The following is an explanation of the role of advocates in litigation and non-litigation:

a. Litigation Advocate

Litigation is the process of resolving disputes or cases through the courts. In general, in the litigation process, advocates have the authority as legal counsel or legal advisors whose role is to provide legal assistance to clients, but advocates usually take care of more legal documents related to the litigation process. In the litigation process, advocates act as legal representatives who protect and safeguard the rights of their clients, as protectors of legal interests and liaisons between clients and the complex justice system. Without the help of an advocate, The litigation process will be more difficult and for people who do not understand and do not understand the law, so it is highly recommended to use an advocate in resolving a litigation case in order to facilitate the settlement of the case.

b. The Non-Litigation Role of Advocates

Non-litigation is the process of resolving disputes or cases outside the court. The role of advocates in assisting clients is not only during the court process, but before that process the role of advocates is already needed outside the court, namely during non-litigation handling. The main objective is to resolve the case through peaceful means with the agreement of the parties concerned without coercion and without causing losses between the two parties. In this case, an advocate must have an honest attitude, high morality and integrity in order to create objective law enforcement.

In carrying out their duties, advocates must also carry out their obligations. If their obligations are not carried out or not carried out, the advocate will be subject to sanctions in accordance with the provisions of Law Number 18 of 2003 concerning Advocates and the Indonesian code of ethics. The existence of Advocates as law enforcers is required to be professional in carrying out their duties and functions based on Articles 1, 4, 5, 6 and 26 of Law Number 18 of 2003. In general, lawyers have the following functions:

1. As guardian of the constitution and human rights.
2. Fighting for human rights.
3. Implementing the advocate code of ethics.
4. Upholding the oath in order to uphold the law, justice and truth.
5. Upholding and prioritizing idealism (values of justice, truth, and morality).
6. Protect and maintain the independence, freedom, degree and dignity of advocates.
7. Maintain and improve the quality of advocate services to the community.
8. Handle cases in accordance with the advocate code of ethics.
9. Prevent misuse of expertise and knowledge that is detrimental to society by supervising the implementation of advocate professional ethics through the Advocate Honor Council.
10. Defending clients in an honest and responsible manner.

In handling divorce cases, advocates usually suggest mediation first and conduct counseling gradually with the aim that their clients do not get divorced but rather improve their relationship. However, if the divorce case is due to domestic violence and child neglect, then this becomes a crucial and more serious case and requires more serious handling. In handling cases in religious courts, especially divorce cases, there are several roles performed by advocates so that the role of the advocate is well realized, the following are those performed by advocates:

- a. Providing Legal Services Advocates play a role  
In divorce cases and provide good service to clients. Advocates provide alternatives or options to reconcile so that the problems faced by their clients can be resolved without having to go to court.
- b. Providing Legal Advice  
Providing advice to clients is the responsibility of the advocate so that his clients have legal awareness and knowledge in the problems being faced. With the legal advice given and knowledge, the client may revoke his lawsuit in court and understand that the court is the last alternative taken because mediation is still carried out first.
- c. Defending Client Interests  
Advocates have a role as defenders of the community and clients and advocates are needed when the community or clients are facing problems in the field of law. Defending the interests of the client in question is an absolute defense and only has certain authority in conducting defense, only to the extent of the problem submitted to him. Advocates also try to always give advice to maintain their household.

#### 4.2. *The Role of Advocates in Handling Divorce Cases When the Plaintiff is Not Present at the Decision Hearing*

The process of case settlement or divorce in Indonesia can be through the court and begins with filing a lawsuit first. A lawsuit is filed by a party who feels aggrieved by the other party and when a lawsuit has been filed, the party involved must fulfill its obligations. During this process the presence and participation of both parties is very important and determines whether or not the legal process will be carried out. It can be attended directly by the party concerned or through a legal representative (advocate) in order to encourage the parties to play an active role in the legal process to be carried out. The divorce process begins with the filing of a lawsuit by the party who wants to end their marriage. Article 39 of Law No.1 of 1974 concerning Marriage states that divorce can only be done through the court.

According to Article 124 HIR (*Herziene Indonesisch Reglement*) a precession lawsuit must be filed in accordance with the applicable legal procedures and includes the filing of a lawsuit letter and summoning the opposing party. If the plaintiff does not attend the hearing that has been determined, then the lawsuit can be declared void and the plaintiff will bear the costs of the case but the plaintiff is still given the opportunity to file a lawsuit again after fulfilling his obligations. However, if the defendant is absent, then the judge may impose a verdict of *verstek*. This *verstek* decision is imposed if the defendant is not present or does not represent his attorney to appear even though he has been properly summoned by the judge.

The judge is obliged to explain about case assistance in accordance with PerMa No.1 of 2008 to the parties to the dispute, (Article 7 PerMa No. 1 of 2008). If there is someone who needs the services of an advocate, then the advocate must help him. One important aspect of the divorce process is legal assistance by a legal representative or advocate. The role of a lawyer or advocate in providing legal assistance to clients is regulated in Law No. 18 of 2003 concerning Advocates. Article 1 of the Law states that an advocate is a person who has the authority to provide legal assistance, both in the context of litigation and non-litigation.

There is no rule stating that the plaintiff must be physically present at the verdict hearing, let alone have been represented by an attorney (advocate) during the trial. The court can still issue a decision even if the plaintiff is not present. However, the presence of the plaintiff is still recommended to ensure that all parties hear the verdict directly read out by the judge and can follow up on the results of the verdict as soon as possible. If the plaintiff is unable to attend the decision hearing, then an

advocate can act to represent the plaintiff's interests. The following is the role of an advocate in this situation:

a. Representing the Plaintiff

The advocate is present at the hearing to listen to the judge's decision and take notes of the important points during the trial, including the contents of the verdict and all decisions made by the court.

b. Communicating Results

After the verdict hearing is over, the advocate is responsible for the result of the verdict and immediately informs the plaintiff of the verdict, including the next steps to be taken by the plaintiff, such as filing an appeal if the plaintiff is not satisfied with the verdict.

c. Providing advanced advice

The advocate can advise the plaintiff on the implications of the judgment, the rights and obligations received after the judgment is rendered. This will help the plaintiff decide on the next course of action.

d. Related Documents

If there is a need to file an appeal or other legal steps after the verdict, the advocate will help prepare and file the necessary documents. If a person is unable or does not have the money to hire an advocate, then under article 22 of the Advocates Law, they are entitled to assistance only. This is in accordance with the advocate code of ethics which states that advocates are obliged to help people who need legal assistance, especially in cases that have a major social impact.

Pro bono from advocates aims to provide access to justice for all people, especially those who are economically disadvantaged. This implementation has challenges, including the lack of advocates who consistently make time to handle pro bono cases and administrative obstacles in identifying clients who truly need assistance. Advocates not only carry out their legal obligations, but also for social justice so that people who are less well-off in divorce can still have a companion when in court, making it easier for them to go through the divorce process.

#### 4.3. Advocate Professional Ethics

Professionalism without ethics makes it free-wing (*vluigel urij*) in the sense that it is uncontrolled without direction. Conversely, ethics without professionalism becomes a paralyzed wing (*vleugel lam*) in the sense of not progressing. According to the Greek philosopher Aristotle, ethics is used to denote moral philosophy that explains moral facts about moral values and norms, commands, policy actions and conscience. The ethics of the Indonesian Advocate profession consists of five major parts, namely: Regarding the advocate's personality; Relationship with clients; Relationship with peers; How to act in handling cases and other provisions.

The code of ethics of the advocate profession in relation to the client is to prioritize the client's interests over personal interests. In addition, an advocate must maintain client confidentiality.

## 5. CONCLUSION

Marriage is one of the ways to maintain human survival, honor and human dignity towards happiness. Divorce is a legal process carried out by husband and wife who will end their marriage. There are many factors that cause divorce, it can be due to internal or external factors. In divorce cases, an advocate is usually needed to resolve it. The role of an advocate in handling divorce cases, especially when the plaintiff is not present at the decision hearing, is very important because with an advocate the trial will run more smoothly and justice in the legal process can be received. Advocates function as legal representatives or substitutes to attend the decision hearing. Advocates have duties namely:

- a. Accompanying or representing the plaintiff in the judgment hearing
- b. record and understand the content of each decision,
- c. and communicate the results of the trial to the plaintiff in an accurate and timely manner.
- d. Advocates also play a role in protecting the rights of their clients,
- e. management of communication between the plaintiff and the court and the processing of relevant documents required for the next steps.

With the presence of an advocate, the plaintiff can still feel maximally accompanied and represented even though the plaintiff is not physically present in court.

## REFERENCES

- Abyta, S. M., Saiban, K., & Sunarjo, S. (2022). Implementation of a mobile court in the settlement of divorce cases at the Tuban Regency Religious Court. *Jurnal Penelitian* (Vol. 19, Issue 1, p. 1). Universitas Merdeka Malang. <https://doi.org/10.26905/jp.v19i1.8026>
- Aziz, A. S. (2019). The Role of Advocate Profession in The Enforcement of Justice System in Indonesia. <https://doi.org/10.2991/iscogi-17.2019.22>
- Emery, R. E. (1995). Divorce Mediation: Negotiating Agreements and Renegotiating Relationships. *Family Relations* (Vol. 44, Issue 4, p. 377). Wiley. <https://doi.org/10.2307/584993>
- Frank E A Sander, Sue M Duncombe. (2023). Letter from Sydney: Like their U.S. counterparts, Australian lawyers strive to define the advocate's role in ADR. <https://onlinelibrary.wiley.com/doi/10.1002/alt.3810101104>
- Kasim, N. M., & Semiaji, T. (2022). Divorce Cases in Members of Indonesian Police Force: A Positive Law Perspective. *Jurnal Ilmiah Al-Syir ah* (Vol. 20, Issue 1, p. 91). <https://doi.org/10.30984/jis.v20i1.1793>
- Kressel, K., Lopez-Morillas, M., Weinglass, J., & Deutsch, M. (1978). Professional Intervention in Divorce. *Journal of Divorce* (Vol. 2, Issue 2, p. 119). Taylor & Francis. [https://doi.org/10.1300/j279v02n02\\_01](https://doi.org/10.1300/j279v02n02_01)
- Latifah, L., & Ritonga, I. (2022). Difference Of Divorce Determination In Indonesia: A Study Systematic Literature Review. *Jurnal Biometrika dan Kependudukan* (Vol. 11, Issue 2, p. 223). Airlangga University. <https://doi.org/10.20473/jbk.v11i02.2022.223-235>
- Louw, D. A., Scherrer, R., & Esterhuise, K. (2004). Parents' perception and experience of the family advocate system. *International Journal of the Sociology of Law* (Vol. 32, Issue 2, p. 167). Elsevier BV. <https://doi.org/10.1016/j.ijsl.2004.01.002>
- Nuna, M., Kodai, D. A., & Moonti, R. M. (2020). Code of Ethics and the Role of Advocates in Providing Legal Aid to the Poor. *Indonesian Journal of Advocacy and Legal Services* (Vol. 1, Issue 2, p. 259). State University of Semarang. <https://doi.org/10.15294/ijals.v1i2.35986>
- Nurhayati, N., & Siregar, H. F. (2019). Aspek Yuridis Status Hukum Anak Dalam Sengketa Perceraian Dan Pembatalan Perkawinan. *RECHTSREGEL Jurnal Ilmu Hukum* (Vol. 2, Issue 1). <https://doi.org/10.32493/rjih.v2i1.2959>
- Pemerintah Republik Indonesia. (2023). Undang-Undang Nomor 18 Tahun 2023 tentang Advokat. Lembaran Negara Republik Indonesia Tahun 2023 Nomor X. Retrieved from [https://www.mkri.id/public/content/infoumum/undang/pdf/Anotasi\\_108\\_Anotasi%20Jefri%20UU%2018%20Tahun%202003%20Advokat.pdf](https://www.mkri.id/public/content/infoumum/undang/pdf/Anotasi_108_Anotasi%20Jefri%20UU%2018%20Tahun%202003%20Advokat.pdf)
- Pemerintah Republik Indonesia. (1974). Undang-Undang Nomor 1 Tahun 1974 tentang Perkawinan. Lembaran Negara Republik Indonesia Tahun 1974 Nomor 1. Retrieved from <https://muslimfamilylawindex.com/wp-content/uploads/2022/12/Marriage-Law-No.-1-1974.pdf>
- Purnomo, V. D., & Dewi, A. (2023). Advocate Role Against Clients in Handling Follow-Up Cases Corruption Crime. *Indonesian Journal of Economic & Management Sciences* (Vol. 1, Issue 3, p. 349). <https://doi.org/10.55927/ijems.v1i3.4593>
- Rokan, M. K., Yazid, I., & Makky, A. (2020). Reconstruction of the Concept of Nushuz of the Wife in the Digital Era. *SAMARAH Jurnal Hukum Keluarga dan Hukum Islam* (Vol. 4, Issue 2, p. 568). <https://doi.org/10.22373/sjhk.v4i2.7259>
- Zai, A., Buulolo, F. D. J., Taufiqurrahman, M., & Marbun, J. (2022). Perlindungan Terhadap Klien Atas Jasa Advokat Ditinjau Dari Undang-Undang No 18 Tahun 2003 Tentang Advokat. *Jurnal Retentum*, 4(2), 278-288.