



# Legal Protection (Rechtsbecherming) Against The Entry Of A Third Party In The Administrative High Court

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## Abstract

*The acceptance of third parties at the appellate level is a discourse that requires in-depth theoretical studies. Law Number 5 of 1986 about Administrative Courts and its amendments do not clearly regulate third parties at the appellate level. This condition has led to the emergence of propaganda from a progressive legal perspective to accommodate third parties at the appellate level for supporting the existentiality of legal protection for justice seekers. This research aims to analyze the acceptance of third parties at the appellate level from the perspective of legal protection, the technical concept of administration, and the trial of the acceptance of third parties at PTTUN. The research method is normative juridical with conceptual and statutory approaches. The results show that third parties are allowed to enter the examination at the appellate level in the context of legal protection, correction of legal error, exploring material truth, and upholding substantive justice. The author offers a technical concept of administration and trial of third-party entry at the PT TUN by submitting an application and its additional documents to the PTSP of PTUN. Furthermore, Judges of PT TUN responds to the third-party application through the interim decision. Furthermore, PT TUN or PTUN does the additional examination.*

**Keywords:** *Third Party; Legal Protection; Administrative High Court; Interim Decision; Additional Examination*

## Introduction

The legal consequence of a constitutional state (*rechtsstaat*) is the existence of the Administrative Judiciary (*Peradilan Tata Usaha Negara*; *Peratun*). As is also known, one of the important components of a constitutional state (*rechtstaat*) according to F.J. Stahl is the existence of an administrative court (Tjandra, 2023, see also: Harahap, 2015). *Peratun* plays a role in protecting the human rights of citizens from government authorities in carrying out their governmental duties. In addition, *Peratun* functions as a protector, an instrument to maintain order, a legal balancer, and as judicial control over government agencies/officials who act authoritarian in making administrative decisions or actions. Fundamentally, it can be said that the essence of *Peratun* is to keep government authority within its corridor of authority (*intra vires*) with the aim of protecting the legal interests of citizens (Simanjuntak, 2018).

During proceedings at the *Peratun*, third-party petitions are often filed in relation to ongoing cases. The court accommodates third-party petitions as a manifestation of legal protection (*rechtsbecherming*) for parties with an interest in disputes at the *Peratun*. Legal protection (*rechtsbecherming*) is an essential part of achieving legal certainty. Legal certainty requires protection against arbitrary actions, which means fulfilling what is a person's right (Risdiarto, 2017). Considering that the purpose of law is legal certainty and, furthermore, to manifest legal justice for everyone, the law is essentially created to produce equilibrium and harmony among human interests (Harahap, 2016).

The third party's request in the dispute at *Peratun* was addressed by the Panel of Judges in an interim decision which was also included in the minutes of the hearing. Reading the provisions of Article 83 paragraphs 1 and 2 of Law Number 5 of 1986 on Administrative Court, it can be understood that the Panel of Judges' decision on the request for a third party to join the case is set out in an interim decision. However, the provisions of the Decree of the Chief Justice of the Supreme Court Number 359/KMA/SK/XII/2022 on Templates and Guidelines for Writing Decisions/Rulings of the Court of First Instance and the Court of Appeal in the Four Courts under the Supreme Court state that the template for the Panel of Judges' stance on requests for intervention is set out in a ruling.

Furthermore, the Decree of the Director General of the Military Court and Administrative Court Number 200/DJMT/SK. OTI.2/XI/2024 on Guidelines for the Implementation of Electronic Case Administration and Trials in the Administrative Court System (Decree of the Director General of Military Courts and Administrative Courts No. 200 of 2024) uses the term interim decision (*Penetapan Sela*). In this paper, the author uses the term interim decision because the above decree places the term interim decision in the additional examination section and becomes the authority of the appellate court judges, which is the focus of the author in this study. The decision may be to grant or reject the request. The barometer for granting a third

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party's request to join a pending case is the existence of a direct or indirect interest in the administrative decision/action that is the subject of the dispute. Furthermore, A. Tirta Irawan categorizes interests as arising on the basis of laws, administrative decisions, agreements, and control in good faith (Permana, et al., 2022).

The discourse will be interesting if the interested third party does not participate as a party in the examination of the case at the first level. The third party is a party that has an interest either because it is directly or indirectly affected, or because it arises from legislation, administrative decisions, agreements, and control in good faith as mentioned earlier.

The critical discourse that needs to be analyzed is the legal issue related to third parties filing a petition to become a party in the examination of a case at the appellate level. Therefore, this paper will analyze the entry of third parties in the appeal level examination from the perspective of legal protection (rechtsbecherming). In this context, it must be seen that the presence of Administrative High Court (Pengadilan Tinggi Tata Usaha Negara; PT TUN) is a form of accommodating access to justice for interested third parties.

Based on the background description above, the main issue in this paper is whether a request to join as a third party in an Administrative Disputes (Tata Usaha Negara; TUN) case can be submitted at the appeal level and how to conceptualize technical guidelines for administration and trials regarding the entry of third parties in PT TUN proceedings.

### **Methods**

The research method used in this paper is a normative juridical method with a conceptual and regulatory approach. The conceptual approach includes analysis of theories, concepts, principles, and legal norms, while the regulatory approach involves examining regulations related to the legal issues being studied. The sources and types of legal materials consist of primary, secondary, and tertiary legal materials.

The technique used to collect legal materials in this study was library research. The analysis of legal materials used in this study was qualitative in nature with prescriptive characteristics (Suratman and Dillah, 2018). This study presents legal materials in logical, organized, and effective sentences, thereby facilitating understanding of the existing legal materials related to the entry of third parties in the examination of administrative dispute cases (Ishaq, 2017).

### **Results and Discussion**

#### **Application to Join as a Third Party in an Administrative Dispute at the Appeal Level**

The basic provisions regarding the involvement of third parties in administrative court proceedings are contained in Article 83 of Law No. 5 of 1986 on Administrative Courts, as amended by Law No. 9 of 2004 and most recently by Law No. 51 of 2009 on the Second

Amendment to Law No. 5 of 1986 (Peratun Law). Article 83 paragraph 1 of the Peratun Law states as follows:

1. *"During the proceedings, any person who has an interest in the dispute of another party being examined by the Court, either on their own initiative by filing a petition or on the initiative of the Judge, may enter into the administrative dispute and act as:*
  - a. *a party defending their rights; or*
  - b. *a participant joining one of the disputing parties."*

The phrase "during the proceedings" as stipulated in Article 83 paragraph 1 of the Peratun Law above raises a legal issue, namely what the position of the Court of Appeals will be if a third-party petition is filed after the case has been decided at the first level. This is what will be discussed in this paper. The provisions of Article 83 of the Peratun Law do not clearly regulate whether it is possible for a third party to join the case during the examination at the appellate level.

In addition, Article 83 paragraph 1 of the Peratun Law refers to the word "Court". Referring to the provisions of Article 1 paragraph 1 of the Peratun Law, the court is the Administrative Court (*Pengadilan Tata Usaha Negara*; PTUN) and PT TUN within the Peratun. On the other hand, Article 83 is contained in Chapter Two Examination at the First Level as per the systematic arrangement of the Peratun Law. Therefore, issues related to the entry of third parties become a separate legal problem in practice.

Furthermore, the provisions of Article 124 of the Peratun Law emphasize that PTUN decisions that are not final decisions can only be submitted for appeal together with final decisions. The explanation of Article 124 of the Peratun Law states that in accordance with the principles of simple, swift, and inexpensive justice, court decisions that are not final decisions cannot be appealed separately. This provision is in line with the provisions of Article 83 paragraph (2) of the Peratun Law, which stipulates that appeals against interim decisions must be filed together with the final decision.

This differs from Book 2 of the 2008 Edition of the Technical Guidelines for Administration and Technical Procedures (Book 2, 2008 Edition), which states that third party petitions may be filed from the time the case is filed until the agenda for the rejoinder. Meanwhile, Indroharto interprets the phrase "during the *proceedings*" in Article 83 paragraph 1 of the Peratun Law differently from the technical guidelines in Book 2 Edition 2008. The former Deputy Chief Justice of the Administrative Court stated that the phrase "during the *proceedings*" as formulated in Article 83 paragraph 1 of the Peratun Law should ideally be interpreted as during the preparatory examination. The entry of third parties is limited to the preparatory examination in order to maintain order in the proceedings at the Administrative Court (Indroharto, 2005).

Furthermore, Indroharto argues that there would be difficulties if interested third parties could file third-party petitions during open court hearings because if there are new parties to the dispute, further preparatory examinations would be required as stipulated in Article 63 of the Peratun Law. However, the preliminary examination has already been completed, followed by the Plaintiff and Defendant (*Ibid*).

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In contrast to Indroharto's opinion above, Enrico Simanjuntak states that the deadline for third parties to enter into a dispute at the Administrative Court can be accepted at the latest before the conclusion is received. (Simanjuntak, 2018) Third parties are not permitted to request to join as a party at the appeal level because intervention requests can only be submitted before the first level of examination. However, the person concerned can still be heard as a witness at the appeal level examination (*Ibid*).

Regardless of the technical guidelines in Book 2, 2008 Edition, and the above doctrinal approach, the Author is of the opinion that the phrase “during the proceedings” as stipulated in Article 83 paragraph 1 of the Peratun Law is also applicable during the examination at the appellate level. This is reinforced by the provisions of Article 1 paragraph 1 of the Peratun Law, which defines the court as the PT TUN and the PTUN. Therefore, the provisions of Article 83 paragraph 1 of the Peratun Law must be interpreted systematically with the provisions of Article 1 paragraph 1 of the Peratun Law.

The granting of a request to join as a third party in the appeal level examination must be based on legal considerations (*ratio decidendi*) that are limited, strict, and casuistic. The legal reasoning (*ratio legis*) for granting the request is to provide legal protection (*rechtsbecherming*) for interested parties in the TUN dispute examination.

The legal considerations (*ratio decidendi*) that can be used as the basis for a third party's request to join the appeal, which are limited, strict, and casuistic, are if there is an error in the application of the law in the first instance examination and the substance of the third party's request to join is considered to be able to determine the considerations of the decision in order to uphold justice. Therefore, it should be noted that not all cases can be subject to the above conditions, thus requiring the Administrative Court Panel of Judges to exercise due diligence in examining the request for third party intervention.

For example, in a TUN dispute examination at the first level, the Panel of Judges examining the case, from the preliminary examination to the verdict agenda, never summoned third parties with an interest in the object of the dispute. The court should have summoned/notified the relevant parties in a lawful and proper manner. The author argues that the indicators of a valid and proper summons can be seen based on:

- a. Valid means that the summons/notification is delivered by a court officer and addressed to the intended party in the form of a registered letter, with proof of receipt, and sent to the domicile of the third party. If the summons/notification cannot be delivered directly to the domicile of the third party, the Panel of Judges requests the village head/sub-district head to post the announcement at the village head/sub-district head's office and in the mass media. In addition, to protect the interests of the third party, the announcement may be made through the court's website and the court's internal notice board (2019 Guidelines for the Implementation of Administrative Procedures for the Directorate General of Military Courts and Administrative Courts). If the summons or notification does not yield results, the Panel of Judges requests a letter from the village

head or sub-district head stating that the third party no longer resides in the area according to their last known address; and

- b. Appropriate means that the summons/notification must be made with a minimum period of six days as stipulated in Article 64 paragraph (2) of the Peratun Law.

If these indicators are not met, then the Administrative Court Judges have erred in applying the law. The implication is that there is no legal protection for third parties whose interests will be harmed by the dispute being examined by the court.

Another example is a land title certificate as the subject of an administrative dispute that has become the subject of a mortgage. During the examination of the dispute at the first level, it was not known that the certificate had in fact become the subject of a mortgage. The lack of equal access to third parties' involvement in the subject of the dispute resulted in unequal access for third parties to cases that intersected with their interests. Therefore, third parties lose the momentum to enter as parties in ongoing cases in order to realize material truth. The closure of access to third parties due to the above conditions will cause losses to third parties if their rights to defend their interests are not accommodated and will result in the failure to achieve justice for *justiciables*.

The above example falls within the substance of a third party's request to join the case, which, if not granted, will result in the consideration of the decision in the context of upholding justice being incomplete. This has implications for the goal of obtaining material truth, which will not be achieved. According to Mardian Wibowo, material truth is the truth obtained through the search, examination, and consideration of legal facts revealed in court and reinforced by the judge's conviction (Wibowo, 2016).

In this paper, the author explores legal protection in the form of illuminating the mechanism for third parties to intervene in the PT TUN in order to uncover material truth and uphold substantive justice, so that the PT TUN can grant the intervention request in an interim ruling. This idea is in line with a progressive approach in cases where there is a conflict between substantive legal principles and formal legal principles, whereby judges should prioritize substantive justice over formal justice. This approach is in line with the function of procedural law, which prioritizes substantive legal principles and repositions formal law in order to support material legal principles. This is in accordance with Supreme Court Circular Letter Number 1 of 2017 on the Enforcement of the Results of the 2017 Supreme Court Plenary Meeting as Guidelines for the Implementation of Court Duties.

The element of interest plays an important role in considering the involvement of third parties in ongoing administrative disputes. The legal interest of the third party in the subject matter of the dispute serves as guidance for the judge in deciding whether the third party can participate in the examination of the case. If the panel of judges at the appellate level finds that the third party has a relevant interest, the petition will be granted. Conversely, if there is no interest in the subject matter of the dispute, the panel of judges may decide to reject the petition. Article 83 paragraph (3) of the Peratun Law states that a decision rejecting the participation of a third party may be submitted together with an appeal against the final decision. Furthermore, Decree of the Directorate General of Military Courts and Administrative

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Courts No. 200 of 2024 states that the rejection decision may also be submitted in a cassation appeal together with the final decision.

Furthermore, the examination at the appeal level also provides room for third parties to submit evidence, namely efforts made by the disputing parties to convince the judge of the truth of an event or incident submitted using evidence as regulated in the law (Sari, 2019). The Administrative Court provides space for third parties to submit evidence because, in essence, the court of appeal is the most legitimate *judex factie* court. *Judex factie* is the authority of the first instance and appellate judges in examining or adjudicating cases based on legal facts. *Judex factie* is carried out by the first instance and appellate courts, which have the authority to determine legal facts and evidence (Hukumonline, 23/09/2024). The examination of cases at the appellate level allows the parties to submit additional documentary evidence, witnesses, and experts that were not submitted at the first level in order to present comprehensive evidence in accordance with the placement of third parties if they are accepted as parties at the appellate level.

In a context where a third party's legal interests are aligned with those of the Defendant, that third party may be referred to as Defendant II Intervention. If the interests of the third party are parallel to those of the Plaintiff, they become Plaintiff II Intervention. Meanwhile, the entry of a third party to defend their own interests is referred to as Plaintiff Intervention. See Book 2 of the 2008 Edition of the Technical Guidelines for Administrative and Technical Administrative Court Proceedings.

The legal reasoning (*ratio legis*) for the entry of third parties at the appeal level can also be linked to the provisions of Article 118 of the Peratun Law. This article provides an opportunity for third parties who were not previously involved or included in the examination of disputes in accordance with Article 83 of the Peratun Law, but who are concerned that their interests will be harmed as a result of the implementation of a final and binding decision (*inkracht van gewijsde*). In such a situation, third parties have the right to file an objection (*derden verzet*) against the implementation of the decision to the court that handled the dispute at the first level.

The legal norm of Article 118 above has been repealed based on Law Number 9 of 2004 on amendments to Law Number 5 of 1986 because, in essence, Peratun does not recognize counterclaims by third parties (*derden verzet*). What needs to be seen from this provision is the spirit of providing legal protection (*rechtsbecherming*) to third parties. This can be the basis for the Administrative Court to adopt legal principles in granting third party petitions. The spirit of this article provides access to justice for related parties as long as they feel that their interests will be harmed.

In relation to the opinion of A. Tirta Irawan as mentioned earlier, particularly interests arising from the law, when linked to several provisions described earlier, the author agrees with A. Tirta Irawan's opinion that the element of interest does not solely arise from personal losses suffered but also applies in the context of law enforcement and implementation itself. Furthermore, Satjipto Rahardjo states that an interest is the purpose of a right, not only because

it is protected by law, but also because of its legitimacy (Satjipto Rahardjo, 2014). The author argues that accommodating the interests of third parties in proceedings at the PT TUN also affirms the rights attached to them.

Accommodating requests for intervention at the appellate level is also in line with the theory of legal protection put forward by Satjipto Rahardjo. According to him, legal protection is an effort to organize various interests in society so that there are no conflicts between interests and all rights granted by law can be maximized (Nola, 2016). Legal protection is an effort to protect the interests of every person in terms of their inherent human rights (Firdaus, 2024). Thus, the entry of third parties at the appellate level is an effort to organize the various interests of the parties so that third parties can maximize all rights legitimized by law and aim to protect their inherent human rights.

Furthermore, Satjipto Rahardjo states that the purpose of law is to realize justice, welfare, and happiness for every human being (Wiguna, 2021). One of the steps to achieve this is through a progressive legal paradigm that accommodates the legal interests of third parties at the appeal level. This is specifically in line with the purpose of law to realize justice.

There is no consensus on the meaning of what is considered fair. Amran Suadi states that a fair decision is created when it is based on an interpretation that takes into account all relevant facts and legal provisions and does not disregard legal principles such as the protection of the law mentioned above (Suadi, 2023). Thus, every justiciable person does not have the option to reject a decision that accommodates all aspects, especially legal protection as stated earlier. This is what is referred to as a just decision.

### **Conceptualization of Technical Guidelines for Administration and Proceedings on the Entry of Third Parties in Examinations at the PT TUN**

In the event that the litigants object to the first instance decision, they may file an electronic appeal through the e-Court application. The legal issue in this discussion is related to the technical administration and trial of the entry of third parties at the appeal level after the appeal has been filed by the litigants. On the other hand, third parties who are rejected as parties in the first instance examination may also file an appeal to request to be included as parties in the case being examined at the PT TUN as stated in the Letter of the Deputy Chief Justice of the Supreme Court of the Republic of Indonesia for Administrative Court Affairs Number 051/Td. TUN/III/1992 regarding the implementation guidelines formulated in the 1991 Training on Improving the Skills of Administrative Court Judges II. The latest developments, as outlined in the 2025 Fiscal Year Administrative Court Technical Coordination Meeting, confirm that appeals against the rejection of intervention parties must be submitted manually and entered into the court information system.

The technical administration of third-party intervention in appeal proceedings is to submit a request to the court of appeal by the applicant. The author lists the documents required for third party intervention, which include:

- 1) A letter of application as a prospective third party;
- 2) A special power of attorney (if authorized) accompanied by an attorney ID card and a record of the attorney's oath or an incidental power of attorney;

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- 3) A photocopy of the principal's and attorney's ID cards (if authorized);
- 4) A photocopy of the articles of association and articles of association of the legal entity and the legal entity's approval by the Minister of Law (specifically for legal entity applicants);
- 5) A photocopy of the subject matter of the dispute;

In addition, the application letter/special power of attorney also contains the electronic domicile of the third party and/or its representative in connection with the appeal process being conducted electronically.

Third party petitions at the appeal level are received by the One Stop Integrated Service (PTSP) officer of the submitting court. The submitting court must ensure that the party submitting the petition is not listed as a third party at the first level of examination. Next, the submitting court inputs the third-party petition and the complete documents into the e-Court application. A crucial issue is that the online appeal registration feature on e-Court does not provide a specific menu for court clerks to upload third-party petitions at the appeal level. According to the author, the solution to this problem is to upload them in bundle A in the other letters menu.

Within 30 (thirty) days after the Appellant files an appeal, the case files are sent to the PT TUN with jurisdiction over the case. Prior to sending the files to the PTUN, the submitting court first gives the parties the opportunity to examine (*inzage*) the appeal case files through e-Court for 3 (three) days from the date of notification of the appeal case examination.

Next, the Chief Justice of the PT TUN determines the composition of the Panel of Judges to handle the appeal case submitted. After being determined by the Chief Justice of the High Court, the Panel of Judges examines the appeal case files and the petition to join as a third party. In the technical context of the trial regarding the entry of a third party, if the Panel of Judges of the High Court deems it necessary to grant the petition to join as a third party, the High Court may conduct an additional examination. The position of the Panel of Judges of the High Court is outlined in an interim decision.

The reason for the additional examination conducted by PT TUN was because the Panel of Judges considered the first instance decision to be incomplete. The author believes that one of the reasons for the additional examination is to accommodate the legal protection of third parties who were not designated as parties at the first level to be subsequently considered and designated as parties at the appeal level. PT TUN can conduct its own additional examination of the TUN dispute under review or order the PTUN that decided the case at the first level to carry out an additional examination.

Here, there is room for PT TUN judges to conduct additional examinations themselves or delegate them to PTUN. PT TUN, as *judex factie*, must be able to respond to additional examinations carefully in order to fill the gaps in the legal considerations in the previous PTUN decision so as to produce a complete and comprehensive (*voeldoende gemotiverd*) set of legal considerations between PTUN and PT TUN.

The additional examination is carried out based on the provisions of Article 127 of the Peratun Law and internalizes the principles of simple, fast, and low-cost justice, which is the authority of the Administrative Court as a *judex factie* mandated in the Explanation of Article 124 of the Peratun Law.

If the Administrative Court orders the Administrative Court that decided the dispute at the first level to carry out an additional examination, the appellate panel of judges orders the submitting court to conduct an additional examination through an electronic interim decision. However, the e-Court application does not yet provide a means for judges at the appeal level to upload interim rulings. Therefore, according to the author, an update of the e-Court application is needed in the future. This is intended to provide a means of inputting rulings on the entry of third parties, similar to the menu available at the first level of examination, which provides an interim ruling menu.

The conceptualization of technical guidelines for administration and proceedings regarding the entry of third parties in examinations at the Peratun is not esoteric, so the author maintains the view that the projection of third-party entry at the Peratun in the future will be dynamic, depending on updates to the court information system, namely e-Court, which is currently used by the Supreme Court. This is in line with the vision of the Supreme Court as expressed by the former Chief Justice, Prof. Dr. H.M Syarifuddin, S.H., M.H in the 2020 Annual Report, namely that the Supreme Court will optimize the modern court system in order to accelerate the case resolution process and provide convenience for every justiciable person.

## **Conclusion**

Third party applications may be submitted during appeals if they have not been designated as parties during the initial proceedings. Furthermore, third party applications are accommodated in the PT TUN in order to uphold substantive justice, uncover material truths, or if the initial court misapplied the law. From a more radical perspective, the entry of third parties at the appellate level is a legal protection measure to organize the various interests of the parties so as to maximize all the rights guaranteed by law. Technically, a request for third party intervention in an appellate hearing is made by submitting a request to the court's administrative office, accompanied by the required documents. The appeal court panel will respond to the request in an interim decision. If the PT TUN panel considers that the court of first instance lacked legal consideration in making its decision, it may order, through an electronic interim decision, that the referring court conduct an additional examination. The court of appeal is the most legitimate *judex factie* court. Therefore, in accepting intervention requests at the appellate level if the first level did not include the judge as a party, the PT TUN judge can use a legal protection and substantive justice approach. The PT TUN judge casuistically grants the request to become a third party with strict and limited legal reasoning (*ratio legis*) based on legal protection. In addition, the Supreme Court needs to update the e-Court application to cover the technicalities of submitting third-party intervention requests and

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accommodate the menu for uploading interim decisions on third-party intervention by the PT TUN judge at the appellate level.

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### **Regulations and Policies**

- Republik Indonesia. Undang-Undang Nomor 5 Tahun 1986 tentang Peradilan Tata Usaha Negara.
- Republik Indonesia. Undang-Undang Nomor 9 Tahun 2004 tentang Perubahan atas Undang-Undang Nomor 5 Tahun 1986 tentang Peradilan Tata Usaha Negara.
- Republik Indonesia. Undang-Undang Nomor 51 Tahun 2009 tentang Perubahan Kedua atas Undang-Undang Nomor 5 Tahun 1986 tentang Peradilan Tata Usaha Negara.
- Republik Indonesia. Undang-Undang Nomor 30 Tahun 2014 tentang Administrasi Pemerintahan.
- Mahkamah Agung. Buku 2 Pedoman Teknis Administrasi dan Teknis Peradilan Tata Usaha Negara Edisi 2008.
- Mahkamah Agung. Surat Edaran Mahkamah Agung Nomor 1 Tahun 2017 tentang Pemberlakuan Rumusan Hasil Rapat Pleno Kamar Mahkamah Agung Tahun 2017 sebagai Pedoman Pelaksanaan Tugas bagi Pengadilan.
- Mahkamah Agung. Surat Keputusan Ketua Mahkamah Agung Nomor 359/KMA/SK/XII/2022 tentang *Template* dan Pedoman Penulisan Putusan/Penetapan Pengadilan Tingkat Pertama dan Tingkat Banding pada Empat Lingkungan Peradilan di Bawah Mahkamah Agung.

## Legal Protection (Rechtsbecherming) Against The Entry Of A Third Party In The Administrative High Court

Mahkamah Agung. Surat Keputusan Ketua Mahkamah Agung Nomor 363/KMA/SK/XII/2022 tentang Petunjuk Teknis Administrasi dan Persidangan Perkara Perdata, Perdata Agama, dan Tata Usaha Negara di Pengadilan secara Elektronik.

Surat Ketua Muda Mahkamah Agung RI Urusan Lingkungan Peradilan Tata Usaha Negara Nomor 051/Td.TUN/III/1992 perihal Juklak yang dirumuskan dalam Pelatihan Peningkatan Keterampilan Hakim Peradilan TUN II Tahun 1991.

Direktorat Jenderal Badan Peradilan Militer dan Peradilan Tata Usaha Negara. Buku Pedoman Pelaksanaan Administrasi Kepaniteraan Peradilan Tata Usaha Negara Tahun 2019.

Direktorat Jenderal Badan Peradilan Militer dan Peradilan Tata Usaha Negara. Surat Keputusan Direktorat Jenderal Badan Peradilan Militer dan Peradilan Tata Usaha Negara Nomor 200/DJMT/SK.OTI.2/XI/2024 tentang Petunjuk Pelaksanaan Administrasi Perkara dan Persidangan secara Elektronik di Lingkungan Peradilan Tata Usaha Negara.

Rumusan Rapat Koordinasi Teknis Lingkungan Peradilan Tata Usaha Negara Tahun Anggaran 2025 Direktorat Jenderal Badan Peradilan Militer dan Peradilan Tata Usaha Negara.