

SIGn Jurnal Hukum

E-ISSN: 2685 – 8606 || P-ISSN: 2685 – 8614
https://jurnal.penerbitsign.com/index.php/sjh/article/view/v8n2-3

Vol. 8 No. 2: October 2026 - March 2027 Published Online: November 12, 2026

Article Title

Small Claims and Access to Justice: Comparative Civil Procedure and Judgment Enforcement in Indonesia, Singapore, and the Philippines

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How to cite:

Makka, A. M. S., & Muliadi, A. (2026). Small Claims and Access to Justice: Comparative Civil Procedure and Judgment Enforcement in Indonesia, Singapore, and the Philippines. *SIGn Jurnal Hukum, 8*(2), 596-618. https://doi.org/10.37276/sjh.v8i2.802

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ABSTRACT

Low-value civil disputes require affordable procedures and judgment-enforcement mechanisms to secure parties' legal rights. This article examines adjudicative jurisdiction, claim eligibility, judicial proceedings, mechanisms for challenging judgments, electronic court administration, and judgment enforcement in Indonesia, Singapore, and the Philippines. Employing normative legal research, it applies statutory, comparative, and conceptual approaches through grammatical and systematic interpretation and a functional comparison of legal provisions. The findings show that Indonesia determines eligibility for small claims proceedings based on the claim's monetary value and evidentiary simplicity. Singapore assigns specified categories of claims to specialized tribunals, whereas the Philippines primarily limits small claims proceedings to claims for the payment or reimbursement of money. Differences in procedural restrictions, legal representation, and mechanisms for challenging judgments require an examination of procedural safeguards. Electronic court services involve legally effective notification and opportunities for the parties to participate in proceedings. In judgment enforcement, the three jurisdictions apply special provisions alongside general civil procedural rules under different institutional arrangements. Access to justice encompasses certainty in claim eligibility, protection of procedural rights, and enforcement of obligations established by judgments. Improvements to Indonesia's regulatory framework should strengthen consistency in preliminary examinations, procedural certainty, and the administration of enforcement procedures and costs.

Keywords: *Access to Justice; Civil Procedure; Comparative Law; Judgment Enforcement; Small Claims.*

INTRODUCTION

Resolving low-value civil disputes raises concerns about the disproportionate relationship between a claim's value and litigation costs. Preparing a claim, presenting evidence, attending hearings, and obtaining legal assistance may entail expenses that exceed or are disproportionate to the value of the disputed rights. Access to justice encompasses the recognition of legal rights and individuals' ability to use legal mechanisms to obtain protection (Rhode, 2004). Within the Indonesian judicial system, Article 2 section (4) of Law Number 48 of 2009 establishes the principle of simple, expeditious, and low-cost judicial proceedings as a foundation for small claims procedures (Harviyani, 2021). Civil justice also protects legal rights through judicial proceedings and reasoned judgments (Genn, 2009). A judgment granting a claim and ordering the performance of an obligation must be enforced in accordance with applicable procedural law. Accordingly, access to justice encompasses the opportunity to bring a claim, obtain a fair hearing, and enforce rights established by the operative provisions of a judgment.

Indonesia regulates small claims proceedings through Supreme Court Regulation Number 2 of 2015, as amended by Supreme Court Regulation Number 4 of 2019. The amendment increased the monetary claim threshold, modified domicile requirements, and introduced provisions concerning electronic case administration, opposition to judgments rendered in the defendant's absence, provisional attachment, and enforcement procedures. Electronic case administration and court proceedings are

also governed by Supreme Court Regulation Number 1 of 2019, as amended by Supreme Court Regulation Number 7 of 2022. Judgment enforcement is governed by the special provisions applicable to small claims proceedings and the general civil procedural rules contained in the Revised Indonesian Regulation (*Het Herziene Indonesisch Reglement*, HIR) and the Regulation for the Outer Regions (*Rechtsreglement voor de Buitengewesten*, RBg). Technical provisions governing proceedings in the General Courts are also contained in Book II, Guidelines for the Technical Implementation of Court Administration and Judicial Proceedings, brought into effect by Decree of the Chief Justice of the Supreme Court Number 159/KMA/SK.HK2/VIII/2026. These instruments define the powers and legal measures applicable to filing, examining, and enforcing claims. Their interaction affects the certainty of small claims procedures within the Indonesian judicial system.

Eligibility for small claims proceedings in Indonesia depends on the claim's legal basis, monetary value, number of parties, domicile requirements, and evidentiary simplicity. Article 3 of Supreme Court Regulation Number 4 of 2019, permits claims based on breach of contract and/or unlawful acts within the prescribed jurisdictional limits. Combining these grounds requires clarity concerning the source of the obligation, the disputed facts, and the relationship between the grounds of the claim (*posita*) and the relief sought (*petitum*) (Hadi & Suhartono, 2023). Research on artificial intelligence in small claims proceedings examines case classification and preliminary examinations as ways to support procedural consistency (Satrio et al., 2026). Domicile requirements also determine territorial jurisdiction and the appointment of legal counsel or representatives under the 2019 amendment (Tjoneng et al., 2020). Preliminary examinations must therefore consider all eligibility requirements established by the Regulation. Assessing evidentiary simplicity determines whether a claim qualifies for the special procedure, whereas determining the truth of disputed allegations belongs to the evidentiary stage.

Singapore and the Philippines regulate low-value civil disputes through different institutional arrangements and jurisdictional requirements. The Small Claims Tribunals Act 1984 confers jurisdiction on Singapore's Small Claims Tribunals to determine specified categories of claims. The Philippines establishes small claims proceedings before the First Level Courts under the Rules on Expedited Procedures in the First Level Courts of 2022. The differences concern dispute types, monetary thresholds, party eligibility, and available forms of relief. A comparison of Indonesia and the Philippines under the rules preceding the 2022 reforms identified the relationship between procedural simplification and access to justice (Feliprada & Jawan, 2019). Institutional differences among Indonesia, Singapore, and Malaysia have also been examined with reference to the jurisdiction of their respective forums (Tendra & Gultom, 2023). The regulatory frameworks of Indonesia, Singapore, and the

Philippines provide a basis for comparing jurisdiction over claims, safeguards during adjudication, and judgment enforcement procedures based on their respective legal functions.

Small claims proceedings protect parties' rights through procedures that restrict certain procedural steps and legal representation. Differences in the organization of judicial authority between ordinary courts and tribunals affect the responsibilities of decision-makers in conducting proceedings (Damaška, 1986). A judge's authority to explain procedural requirements and manage hearings must be exercised with due regard to the scope of the claim and the parties' opportunity to respond. The limits of judicial intervention are linked to the prohibition against granting relief beyond what is sought and to the protection of the right to be heard (Nugroho, 2025). Electronic court administration raises additional issues concerning service of summons, notification, calculation of time limits, and electronic documents. The validity of electronic notification through e-Court determines the parties' opportunity to exercise procedural rights within prescribed time limits (Tambunan & Yunanto, 2024). Online dispute resolution also requires procedures that ensure user participation and fair treatment (Tan, 2019).

Judgment enforcement is a stage of civil dispute resolution concerned with satisfying obligations established by the operative provisions of a judgment. Civil procedural law distinguishes voluntary compliance, compulsory enforcement, the legal effect of judgments, and the authority of enforcement officers (Setyowati, 2023). Research on small claims arising from banking credit disputes has identified issues concerning the allocation of enforcement costs and the timing of their payment (Pati et al., 2024). In Singapore, orders issued by the Small Claims Tribunals are enforced through civil court procedures. The Philippines regulates applications for writs of execution through special procedural rules supplemented by general civil procedure. These differences determine which officers may issue enforcement orders, the available enforcement measures, and the requirements governing their implementation. Clarity on authority, the amount payable under a judgment, enforcement costs, and the availability of assets subject to enforcement affects whether the successful party can satisfy the judgment.

Previous studies have examined small claims proceedings through jurisdictional rules, business disputes, civil procedure, technology, and judgment enforcement. Research on business dispute resolution has addressed expedited procedures and difficulties in enforcing judgments under the regulatory framework examined in that study (Retnaningsih & Velentina, 2019). An integrated online dispute resolution system has also been proposed as a reform of Indonesian procedures (Mubdi & Trikusrahayu, 2024). The relationship among legal substance, institutions, and community needs has likewise informed research on small claims reform (Rachmarani et al., 2024).

These studies provide a basis for examining jurisdiction, procedural safeguards, and enforcement. A further legal issue concerns the relationship among claim acceptance, procedural measures during adjudication, and the enforcement of obligations established by judgments across three jurisdictions. This research contributes by comparing legal consequences and the allocation of authority across these stages in Indonesia, Singapore, and the Philippines. The comparison identifies aspects of Indonesian law that require clearer application and further improvement.

Accordingly, this research aims to analyze adjudicative jurisdiction and eligibility requirements for small claims, compare proceedings through judgment and the use of electronic court administration, and examine judgment enforcement in Indonesia, Singapore, and the Philippines. The comparison addresses the functional equivalence of adjudicative forums, procedural requirements, the institutional position of decision-makers, procedural safeguards, and the relationship between special provisions and general civil procedural rules. Theoretically, the research explains the relationship among access to adjudicative forums, fair hearings, and the satisfaction of obligations established by judgments. Practically, its findings provide a basis for recommendations concerning the consistent application of eligibility requirements, the conduct of proceedings, and the administration and implementation of judgment enforcement within the Indonesian judicial system.

METHOD

This normative legal research employs statutory, comparative legal, and conceptual approaches (Qamar & Rezah, 2020). The statutory approach examines adjudicative jurisdiction, eligibility requirements, procedural measures, the legal effect of judgments, and enforcement based on the legal status and interaction of relevant provisions. The comparative legal approach examines the functions of low-value civil dispute resolution in Indonesia, Singapore, and the Philippines while accounting for differences in institutional arrangements and legal systems. The conceptual approach explains the relationship among the organization of judicial authority, the functions of civil justice, and access to justice, drawing on relevant legal scholarship.

The comparison comprises three groups of issues. The first concerns jurisdiction, claim categories, monetary thresholds, party eligibility, domicile requirements, and costs. The second covers filing, service of summons, notification, representation, settlement, evidence, judgments, mechanisms for challenging judgments, and electronic court administration. The third addresses voluntary compliance, enforcement applications, the authority of enforcement officers, enforcement measures, property subject to enforcement, and costs. Each provision is analyzed according to its regulatory subject matter, conditions of application, competent authority, and legal consequences. Procedural time limits are compared using equivalent starting and ending points. The

comparison of enforcement distinguishes the legal effect of judgments, the issuance of orders, enforcement measures, and satisfaction of obligations.

Primary legal materials include Indonesian legislation and judicial regulations, Singapore's Small Claims Tribunals Act 1984 and Rules of Court 2021, and the Philippines' Rules on Expedited Procedures in the First Level Courts of 2022 and Rules of Court. This study examines implementing provisions and judicial practice guidelines according to their legal status and the authority they confer within each legal system. Secondary legal materials include theoretical books and scholarly journal articles on small claims, civil procedure, digitalization, and judgment enforcement. Sources were obtained from official legal documents and academic publications (Sampara & Husen, 2016). Findings from previous studies are used according to the subject matter, location, and research period of the respective publications.

The legal materials are analyzed through grammatical and systematic interpretation to determine the meaning of legal provisions, the relationship between special and general rules, and the legal consequences of regulated measures (Irwansyah, 2020). The interpreted provisions are compared according to their dispute-resolution functions at each procedural stage. Secondary literature is analyzed by examining similarities and differences in scholarly positions and their relevance to the legal issues under consideration. Conclusions concerning positive law are based on primary legal materials, while secondary literature provides conceptual explanations and insights into implementation. The comparative findings inform recommendations concerning jurisdiction, the protection of rights during proceedings, and judgment enforcement in Indonesian small claims cases.

RESULTS AND DISCUSSION

A. Jurisdiction and Eligibility Requirements for Small Claims Proceedings

Low-value civil disputes may be resolved through special procedures before courts of general jurisdiction or institutions vested with specific adjudicative authority. Article 2 of Supreme Court Regulation Number 2 of 2015 provides that courts within Indonesia's General Courts examine and determine small claims. Singapore regulates its Small Claims Tribunals under the Small Claims Tribunals Act 1984, whereas the Philippines establishes small claims proceedings before the First Level Courts under the Rules on Expedited Procedures in the First Level Courts of 2022. These frameworks differ in institutional structure and the allocation of adjudicative authority. Institutional arrangements shape the position of decision-makers and how adjudicative functions are exercised (Damaška, 1986). Differences among forums for resolving low-value claims have been examined in comparative research (Tendra & Gultom, 2023). Court jurisdiction must also

be distinguished from the authority of consumer dispute resolution bodies established under separate legal provisions (Kurniawan, 2017). Accordingly, the comparison concerns equivalent dispute-resolution functions, while jurisdiction remains governed by the law applicable to each forum.

Article 3 section (1) of Supreme Court Regulation Number 4 of 2019, permits claims based on breach of contract and/or unlawful acts with a monetary value not exceeding IDR 500,000,000. Article 3 section (2) excludes land-rights disputes and matters falling within the jurisdiction of specialized courts. These requirements relate to the preliminary examination prescribed by Article 11 of Supreme Court Regulation Number 2 of 2015, which authorizes the judge to assess evidentiary simplicity. Combining claims based on breach of contract and unlawful acts requires clarity on the source of the obligation, the disputed facts, and the relationship between the grounds and the relief sought (Hadi & Suhartono, 2023). Consistency in determining eligibility is addressed in research concerning artificial intelligence at the filing and preliminary examination stages (Satrio et al., 2026). The judge must examine the legal relationship, the number and legal positions of the parties, and the facts requiring proof. The volume of documents or the monetary value of a claim does not, by itself, establish evidentiary simplicity. The preliminary examination determines whether a case meets the requirements for the special procedure.

Singapore confers jurisdiction on the Small Claims Tribunals over specified claims under Section 5 and the Schedule to the Small Claims Tribunals Act 1984. These categories include claims arising from contracts for the sale of goods, the provision of services, certain property damage, and residential tenancy agreements with contractual terms of up to two years. The Schedule also covers specified claims under consumer protection and property management legislation. Amendments effective from October 1, 2025, include certain claims involving charges, contributions, and interest associated with strata property management. Section 5(2) excludes claims for property damage caused by accidents involving the use of motor vehicles. These expressly defined categories form the basis for determining tribunal jurisdiction based on the dispute's nature. Claims outside those categories fall within the jurisdiction of other competent forums under applicable law. Research on business disputes has also emphasized the importance of matching the nature of a dispute with the procedure used to resolve it (Retnaningsih & Velentina, 2019). Compared with Indonesia, Singapore distinguishes jurisdiction through specified categories of claims rather than through grounds of civil liability combined with an assessment of evidentiary simplicity.

The Philippines regulates small claims as a procedure for resolving claims for the payment or reimbursement of money under Section 1.A(2), Rule I of the

Rules on Expedited Procedures in the First Level Courts of 2022. These claims include monetary obligations arising from loans, leases, service contracts, and sales of movable property. The rules also cover enforcement of community-level amicable settlements (barangay settlements) and barangay arbitration awards, provided the monetary claims meet the prescribed requirements. Claims seeking the delivery of property as a separate form of relief differ from claims for payment or reimbursement. Rule I also distinguishes small claims from summary procedure, which has separate eligibility requirements and monetary thresholds. A comparison of Indonesia and the Philippines preceding the 2022 reforms examined the objectives of procedural simplification and broader access to dispute resolution (Feliprada & Jawan, 2019). Under the 2022 rules, jurisdiction over Philippine small claims proceedings is primarily determined by the type of monetary relief sought.

Monetary claim thresholds are jurisdictional requirements, but their calculation methods differ across the three countries. Indonesia sets the maximum monetary claim value at IDR 500,000,000 under Supreme Court Regulation Number 4 of 2019. Section 2 of Singapore's Small Claims Tribunals Act 1984 establishes a general threshold of SGD 20,000, while Section 5(4) permits an increase to SGD 30,000 with the parties' written consent. Under Section 2(2), certain claims involving contract rescission and installment payments are assessed according to the contract value, while other contractual claims are assessed according to the amount sought. Sections 8 and 9 regulate the prohibition against splitting claims and the relinquishment of part of a claim to establish tribunal jurisdiction. The Philippines sets a threshold of PHP 1,000,000 under Section 1.A(2), Rule I, with the principal amount calculated under the applicable provisions on interest and costs. Monetary thresholds have been an important element in the development of Indonesian small claims procedures (Marjo & Rofikoh, 2020; Wibowo & Wijaya, 2021). The comparison shows that monetary jurisdiction depends on the prescribed threshold, calculation method, and legal consequences of relinquishing part of a claim.

Requirements concerning the parties and territorial jurisdiction determine the competent court for small claims proceedings. Article 4 section (1) of Supreme Court Regulation Number 4 of 2019 generally limits each side to one claimant and one defendant, except where multiple parties share a common legal interest. Article 4 section (2) excludes claims against defendants whose places of residence are unknown. Article 4 section (3a) permits a claimant residing outside the territorial jurisdiction of the defendant's residence or domicile to appoint legal counsel, an ad hoc representative, or a locally appointed representative in accordance with the prescribed requirements. Article 4 section (4) continues to

require the parties to appear personally at hearings. Singapore requires claims to be served on respondents in Singapore and prescribes a two-year filing period from the date on which the cause of action arose under Section 5 of the Small Claims Tribunals Act 1984. The Philippines establishes specific venue requirements for financing institutions under Section 5, Rule IV of the 2022 Rules. Indonesia's 2019 amendments concerning domicile expanded access to the procedure for claimants residing in different territorial jurisdictions (Tjoneng et al., 2020). These differences determine territorial jurisdiction, attendance requirements, and the use of representatives within each legal system.

Litigation costs and administrative assistance affect individuals' ability to use small claims procedures. Article 8 section (3) of Supreme Court Regulation Number 2 of 2015 permits eligible claimants to apply for proceedings without payment of court fees. This provision is related to Article 4 section (2) of Law Number 48 of 2009, which requires courts to assist persons seeking justice and overcome obstacles to the administration of justice. Singapore differentiates filing fees by the monetary value of claims and the claimant's category, including individuals and business entities. The Philippines regulates court fees, assistance for indigent litigants, and additional requirements for repeated filings under Section 8, Rule IV of the 2022 Rules. Economic resources and legal knowledge affect individuals' ability to access legal protection (Rhode, 2004). The relationship among community needs, legal institutions, and legal substance also influences the delivery of judicial services (Rachmarani et al., 2024). Clear information concerning fees and administrative requirements is an important element of access to small claims forums.

The jurisdictional comparison demonstrates the distinction between certainty arising from expressly defined claim categories and certainty in applying eligibility requirements. Singapore determines tribunal jurisdiction through claim categories specified by legislation. The Philippines primarily limits small claims proceedings to demands for payment or reimbursement of money. Indonesia permits claims based on breach of contract and/or unlawful acts, subject to a preliminary assessment of evidentiary simplicity. Indonesian law covers various civil legal relationships that satisfy the prescribed requirements, but determining eligibility requires judicial consideration of the disputed facts and legal relationships. Consistent eligibility assessments, including the use of technology in preliminary examinations, require clearly established legal criteria (Satrio et al., 2026). Judicial reasoning must explain the relationship among the claim's grounds, the relief sought, common legal interests, domicile, and evidentiary requirements. Preliminary examinations must also distinguish remediable administrative deficiencies from unmet jurisdictional requirements.

Consistency in these assessments determines whether a case proceeds under the special procedure before the substantive examination begins.

B. Small Claims Adjudication and Procedural Safeguards

Filing a small claim involves submitting the case and verifying administrative completeness before an authorized decision-maker determines eligibility. Articles 6 and 7 of Supreme Court Regulation Number 2 of 2015 govern filing through the court registry, claim forms, documentary evidence, and verification of administrative requirements. Article 11 authorizes a single judge to conduct a preliminary examination based on the requirements for small claims proceedings. Singapore regulates the submission of claims to the Registrar, the official responsible for specified tribunal administrative and procedural functions, under Sections 15 and 16 of the Small Claims Tribunals Act 1984. Claims are administered through the Community Justice and Tribunals System (CJTS). The Philippines requires a Statement of Claim, verification, certifications, documents establishing the claim, and supporting evidence under Section 4, Rule IV of the Rules on Expedited Procedures in the First Level Courts of 2022. These differences determine who is responsible for verifying the completeness of documents and conducting preliminary assessments. Complete initial information enables the court or tribunal to determine the applicable procedure and informs the defendant or respondent of the claim.

Valid service of summons and legally effective notification are prerequisites for exercising the right to present a defense in small claims proceedings. Article 13 of Supreme Court Regulation Number 4 of 2019 governs the consequences of a claimant's or defendant's failure to appear, including the repeated service of summons on the defendant. Article 14 of Supreme Court Regulation Number 2 of 2015 requires the judge to explain the applicable procedure impartially. Singapore governs the service of claims and hearing notices under Section 19 of the Small Claims Tribunals Act 1984 and restricts representation by advocates under Section 23. The Philippines regulates service of summons and the filing of a Response under Sections 10 to 13, Rule IV of the 2022 Rules, including a ten-calendar-day period for submitting the Response. Sections 17 and 18, Rule IV govern personal appearance, representation requirements, and restrictions on representation by legal counsel. The parties must have an opportunity to explain their legal positions and respond to disputed facts. Judges and tribunal officials must provide procedural explanations within their prescribed authority while ensuring balanced treatment.

Amicable settlement constitutes a mechanism for resolving small claims under the authority and procedures established in each jurisdiction. Article 15

of Supreme Court Regulation Number 2 of 2015 requires the judge to attempt settlement at the first hearing while observing the prescribed time limit for adjudication. General civil mediation procedures do not apply to this settlement process. Section 17 of the Small Claims Tribunals Act 1984 authorizes the Registrar to conduct consultations and record settlements reached by agreement under tribunal procedures. In the Philippines, Section 22, Rule IV of the Rules on Expedited Procedures in the First Level Courts of 2022 governs settlement attempts during hearings, while Section 27 excludes the application of general mediation and judicial dispute resolution procedures. These differences determine which officials facilitate settlement and how agreements are recorded. The time limit for Indonesian small claims proceedings may restrict opportunities for negotiation before adjudication continues (Marjo & Rofikoh, 2020). Settlement procedures must therefore ensure that the parties consent to the terms of their agreement and the obligations undertaken.

Restrictions on procedural measures affect the examination of claims involving reciprocal legal obligations. Article 17 of Supreme Court Regulation Number 2 of 2015 prohibits claims for provisional relief, preliminary objections, counterclaims, third-party intervention, the claimant's reply, the defendant's rejoinder, and final submissions in small claims proceedings. Singapore provides for informal proceedings under Section 22 of the Small Claims Tribunals Act 1984, allowing the tribunal to identify relevant issues and request evidence. The Philippines permits certain counterclaims under Section 15, Rule IV of the 2022 Rules, subject to requirements concerning the legal relationship, monetary threshold, and filing. Indonesia's prohibition against counterclaims prevents reciprocal claims from being examined within the same small claims proceedings. Such claims may be brought through the competent procedure according to their nature and applicable requirements. Philippine law allows related claims to be resolved together when the requirements governing counterclaims are satisfied. This difference affects the number of proceedings required and how related facts are examined. Judicial intervention remains subject to the facts and relief presented by the parties and the prohibition against granting relief beyond that sought (Nugroho, 2025).

The examination of evidence in small claims proceedings must ensure that relevant facts are assessed within the prescribed procedural framework. Article 18 of Peraturan Mahkamah Agung Nomor 4 Tahun 2019, distinguishes fully admitted allegations from disputed allegations. Disputed allegations are examined under the applicable rules of evidence. Article 17A of the Regulation also authorizes the judge to order provisional attachment during proceedings, subject to the relevant legal requirements. In Singapore, Section 28 of the Small Claims Tribunals Act 1984 authorizes tribunals to receive and evaluate evidence without being fully bound by

the evidentiary rules applicable to ordinary court proceedings. The parties must nevertheless have an opportunity to respond to information considered by the tribunal. The Philippines requires documentary evidence and written statements when filing claims and Responses under Sections 4 and 13, Rule IV of the 2022 Rules. Indonesia's prohibition against claims for provisional relief serves a different function from the judge's authority to order provisional attachment. The sufficiency of evidence determines the basis for judicial reasoning and protects the parties' rights (Genn, 2009).

Procedural time limits apply to different stages of small claims proceedings in the three countries. Article 5 section (3) of Supreme Court Regulation Number 2 of 2015 requires cases to be resolved within 25 working days from the first hearing. Articles 19 and 20 govern the pronouncement and contents of judgments. Singapore distinguishes consultations conducted through the Registrar from tribunal hearings that may result in orders under Section 35 of the Small Claims Tribunals Act 1984. The Philippines requires hearings to be scheduled within 30 calendar days of filing the Statement of Claim under Section 10, Rule IV of the 2022 Rules. The period extends to 60 calendar days when a defendant resides or conducts business outside the judicial region in which the court is located. Section 22, Rule IV provides for examination within a single hearing day, while Section 24 requires judgment within 24 hours after the hearing concludes. These provisions regulate case resolution, hearing schedules, and judgment issuance as distinct procedural measures. Accordingly, procedural timeliness must be assessed according to the relevant stage, the starting point for calculating the period, and the unit of time prescribed by each jurisdiction.

Mechanisms for challenging judgments determine the parties' opportunities to seek correction and when judgments acquire final and binding legal effect. Articles 21 and 22 of Supreme Court Regulation Number 2 of 2015 provide for objections within seven working days after a judgment is pronounced or notified in accordance with the applicable provisions. Article 29 governs notification and the final and binding effect of decisions on objections, while Article 30 excludes appeal, cassation appeal, and extraordinary review of those decisions. Article 13 section (3a) of Supreme Court Regulation Number 4 of 2019 provides for opposition to a judgment rendered in the defendant's absence (verzet). Singapore permits limited appeals concerning questions of law or jurisdiction under Section 38 of the Small Claims Tribunals Act 1984, subject to the required permission. Section 41 governs applications to set aside certain tribunal orders. The Philippines provides that small claims judgments are final, executory, and unappealable under Section 24, Rule IV of the 2022 Rules. These different mechanisms affect when parties may apply for enforcement.

Electronic court administration enables procedural measures to be undertaken under the authority and requirements established by law. Article 6A of Supreme Court Regulation Number 4 of 2019 permits electronic administration of small claims. Its implementation is related to Supreme Court Regulation Number 1 of 2019, as amended by Supreme Court Regulation Number 7 of 2022. These instruments govern electronic case administration, notification through electronic domiciles, and electronic court proceedings subject to applicable requirements. Singapore uses CJTS to file and manage claims. Sections 18 and 25 of the Small Claims Tribunals Act 1984 regulate the use of electronic means in consultations and tribunal proceedings. CJTS also provides eNegotiation and eMediation facilities. The Philippines permits notification through electronic communication and hearings by videoconference under Sections 11 and 23, Rule IV of the 2022 Rules. The legal validity of electronic notification affects the calculation of time limits for exercising procedural rights, including objections in Indonesia (Tambunan & Yunanto, 2024). Accordingly, the transmission of documents, receipt of notification, and resulting legal consequences must be distinguished under the applicable rules.

The use of electronic judicial services is affected by users' capabilities, infrastructure availability, and the protection of rights during proceedings. Online dispute resolution requires adequate opportunities for the parties to understand claims, submit Responses, and participate in dispute resolution (Tan, 2019). Research involving lawyers from small firms in Nueva Vizcaya identified relationships between digital skills, infrastructure availability, and the use of electronic court procedures (Ablang & Inocentes, 2026). Proposals for integrated online dispute resolution in Indonesia emphasize the need for consistent procedures and accessible service facilities (Mubdi & Trikusrahayu, 2024). Research on dispute resolution across electronic commerce platforms also discusses differences in regulation, data protection, and enforcement of settlement outcomes (Tantimin et al., 2026). Using artificial intelligence in small claims proceedings requires clear responsibility for decision-making and safeguards against excessive reliance on automated outputs (Satrio et al., 2026). Electronic judicial services must ensure that service of summons, notification, hearings, and decisions comply with applicable procedural law.

The procedural comparison demonstrates that safeguards remain applicable in simplified small claims proceedings. Indonesia employs a single judge and restricts certain procedural measures. Singapore grants tribunals active authority to identify legal issues and request relevant evidence. The Philippines requires documents to be submitted when claims are filed and permits counterclaims subject to prescribed requirements. These institutional differences affect the

responsibilities of decision-makers in managing proceedings (Damaška, 1986). The ability to exercise procedural rights also depends on the parties' understanding of the procedure and access to necessary information (Rhode, 2004). All three jurisdictions regulate notification, opportunities to respond, evidence evaluation, and mechanisms for challenging judgments under different requirements. In Indonesia, consistent implementation requires clarity in service of summons, explanations of procedural requirements, time limits, and evidentiary reasoning. The validity of procedural measures affects the legal status of judgments and their subsequent enforcement.

C. Judgment Enforcement and Satisfaction of Rights in Small Claims Proceedings

Civil judgment enforcement depends on the nature of the operative provisions, the judgment's legal effect, and the authority of enforcement officers. Condemnatory operative provisions (condemnatoir) impose obligations to pay, deliver property, or perform specified acts. Declaratory operative provisions (declaratoir) and constitutive operative provisions (constitutief) produce different legal consequences. Article 54 section (2) of Law Number 48 of 2009 assigns the implementation of civil judgments to court registrars and bailiffs under the direction of the chief judge of the court. Article 55 section (1) governs supervision of the enforcement of judgments that have acquired final and binding legal effect. Book II, Guidelines for the Technical Implementation of Court Administration and Judicial Proceedings, brought into effect by Decree of the Chief Justice of the Supreme Court Number 159/KMA/SK.HK2/VIII/2026, contains technical provisions on court administration and judgment enforcement within the General Courts. Civil procedural law distinguishes voluntary compliance from compulsory enforcement and recognizes exceptions to the requirement that certain judgments become final before enforcement (Setyowati, 2023). Enforcement applications must therefore be based on the nature of the operative provisions and the applicable requirements for enforcing judgments.

Article 31 of Supreme Court Regulation Number 4 of 2019, governs voluntary compliance and enforcement applications in small claims proceedings. Article 31 section (2a) requires the chief judge of the court to issue an order for a formal judicial warning (aanmaning) no later than seven working days after receiving an application for enforcement. Article 31 section (2b) prescribes a seven-working-day period after the order for determining the date on which the warning will be conducted. Article 31 section (2c) provides exceptions to scheduling requirements based on specified geographical conditions. These time limits govern the issuance of the order and the scheduling of the warning as separate procedural measures. Article 31 section (3) requires the application of general civil procedural law when

the obligation is not performed voluntarily. Article 32 of Supreme Court Regulation Number 2 of 2015 also preserves the application of general civil procedural rules to matters not specifically regulated. Subsequent compulsory measures depend on the nature of the obligation, the property subject to enforcement, and the applicable civil procedural rules.

Formal judicial warnings and compulsory enforcement measures in Indonesia are governed by the HIR and RBg as general civil procedural rules. Article 196 of the HIR and Article 207 of the RBg provide for a formal warning requiring the judgment debtor to comply within a period of no more than eight days. This compliance period differs from the deadlines for issuing and scheduling an aanmaning under Supreme Court Regulation Number 4 of 2019. Once the requirements for compulsory enforcement are satisfied, Article 197 of the HIR and Article 208 of the RBg govern the seizure of assets in enforcement proceedings, while Article 200 of the HIR regulates the sale of seized property by auction. Obligations to perform specified acts are addressed by Article 225 of the HIR and Article 259 of the RBg. Provisional attachment under Article 17A of Supreme Court Regulation Number 4 of 2019, is also relevant to judgment enforcement once the attachment has been declared valid and effective under applicable law. Enforcement measures must account for ownership, third-party rights, asset values, and the possibility of selling property subject to enforcement. Book II, Guidelines for the Technical Implementation of Court Administration and Judicial Proceedings of 2026, also contains provisions concerning stays of execution and circumstances in which judgments cannot be enforced.

Singapore distinguishes the Small Claims Tribunals' authority to grant relief from the civil courts' authority to enforce tribunal orders. Section 35 of the Small Claims Tribunals Act 1984 permits monetary orders, work orders, and other forms of relief within the prescribed categories of claims. A work order may require the rectification of defects in goods, property damage, or deficiencies in the performance of services as prescribed by the Act. Section 36 provides for enforcement of tribunal orders through mechanisms applicable to District Court judgments or orders. Section 40 governs the binding effect of tribunal orders, while Section 38 permits limited appeals on questions of law or jurisdiction. Section 42 establishes that filing an appeal does not automatically stay enforcement. These provisions distinguish the binding effect of orders, appeals, stays, and enforcement measures. The relief granted by the tribunal determines the required form of enforcement.

Enforcement of Singapore Small Claims Tribunals orders is governed by Order 22 of the Rules of Court 2021 and the State Courts Practice Directions 2021. Order 22 provides for enforcement orders involving the seizure and sale

of property, the seizure of debts, and the delivery or recovery of possession according to the terms of the order. Paragraph 96(1)(b) of the State Courts Practice Directions 2021 governs an originating application without notice supported by a supporting affidavit. This procedure is used to enforce certain tribunal orders concerning monetary payments or the delivery of vacant possession of premises. It differs from a summons without notice, which is used for other types of court judgments. Within the State Courts, the Bailiff carries out enforcement measures under the order and applicable rules. Enforcement applications, the issuance of enforcement orders, and measures undertaken by the Bailiff are subject to distinct requirements and authorities. The seizure of property or debts and the delivery of possession depend on the obligation imposed and the condition of the assets subject to enforcement.

The Philippines regulates the enforcement of small claims judgments under Sections 24 and 25, Rule IV of the Rules on Expedited Procedures in the First Level Courts of 2022. Section 24 provides that judgments are final, executory, and unappealable. Section 25 governs the issuance of a writ of execution upon an ex parte motion filed by the party entitled to enforce the judgment. The motion must be accompanied by the prescribed forms and proof of receipt of the judgment, subject to the exception applicable to judgments based on settlement. The required enforcement forms depend on the nature of the judgment and the obligations imposed. Section 1, Rule II permits the supplementary application of the Rules of Court to the extent consistent with small claims procedures. Enforcement of monetary obligations is further governed by Section 9, Rule 39 of the 1997 Rules of Civil Procedure, concerning demands for payment and the seizure of property and debts. Section 14, Rule 39 governs reports submitted by the responsible enforcement officer. The special rules determine the issuance of the writ, while general procedural law governs compulsory enforcement measures and the recording of their results. Satisfaction of the obligation depends on the amount awarded and the assets available for enforcement.

The comparison demonstrates that Indonesia, Singapore, and the Philippines apply special provisions alongside general civil procedural rules under different institutional arrangements. Indonesia regulates voluntary compliance and aanmaning through Supreme Court Regulation Number 2 of 2015, as amended in 2019, and subsequently applies the HIR and RBg to compulsory enforcement. Singapore relies on civil court mechanisms to enforce Small Claims Tribunals orders. The Philippines regulates applications for writs of execution through special rules and applies the Rules of Court to enforcement measures. Comparative research on Indonesia and the Philippines has shown the importance of enforcement mechanisms in satisfying legal rights (Feliprada & Jawan, 2019). Research on Indonesian small claims proceedings has also identified relationships

between enforcement procedures and implementation difficulties (Hidayat, 2023). In protecting legal rights, adjudication and enforcement constitute two stages of civil dispute resolution governed by distinct requirements (Genn, 2009). Enforcement certainty depends on the authority of enforcement officers, application procedures, the issuance of orders, and measures involving property subject to enforcement. These elements determine the continuity of access to justice after adjudication concludes.

Enforcing judgments requiring monetary payment necessitates clarity concerning the amount owed, available assets, and enforcement costs. Research on small claims arising from banking credit disputes has identified issues concerning responsibility for enforcement costs and the timing of payment (Pati et al., 2024). Research conducted in particular courts has also documented difficulties in enforcing small claims judgments based on those courts' experience in resolving cases (Retnaningsih & Velentina, 2019). In the enforcement of industrial relations judgments, asset tracing is associated with identifying property subject to compulsory measures (Herdiana et al., 2025). Research on construction contract disputes emphasizes the importance of clearly specified payment obligations and amounts awarded in judgments (Lo et al., 2025). These four studies address different aspects of enforcing civil obligations. The operative provisions of a judgment determine the nature and amount of the obligation, asset tracing identifies property subject to enforcement, and enforcement costs cover implementing the required measures. The allocation of costs must follow applicable law. Court administration should provide applicants with details of enforcement costs and maintain records of payments and their use within the prescribed authority.

Security arrangements and administrative supervision are components of civil judgment enforcement. Research on security arrangements for enforcing judgments concerning disputed property in South Sulawesi identified the importance of coordination and clearly allocated responsibilities among the officers involved (Husen et al., 2020). Within Indonesia's General Courts, the Electronic Supervision of Judgment Enforcement system (PERKUSI) monitors the administration of enforcement applications, aanmaning, court orders, and enforcement measures. Internal supervision is distinct from providing information to enforcement applicants under applicable rules on authority and data protection. Book II, Guidelines for the Technical Implementation of Court Administration and Judicial Proceedings of 2026, provides guidance on enforcement, stays of execution, and circumstances in which judgments cannot be enforced. Proper recordkeeping covers applications, costs, asset identification, court orders, officers' actions, and enforcement outcomes. The ability to use legal mechanisms and obtain necessary information constitutes an element of access to justice (Rhode, 2004). In judgment

enforcement, information must be provided to entitled parties according to the applicable rules and institutional authority. Coordination among court officials, bailiffs, and supporting institutions is necessary to implement the operative provisions and lawfully record satisfaction of the obligations.

CONCLUSIONS AND SUGGESTIONS

Jurisdiction over small claims in Indonesia, Singapore, and the Philippines is determined by different categories of claims, monetary thresholds, eligibility requirements, and available forms of relief. Indonesia permits claims based on breach of contract and/or unlawful acts, subject to an assessment of evidentiary simplicity. Singapore assigns specified categories of claims to the Small Claims Tribunals, while the Philippines primarily limits small claims proceedings to demands for payment or reimbursement of money. Domicile requirements, costs, and administrative completeness also affect access to the relevant forums. In Indonesia, greater consistency in preliminary examinations requires clearer judicial reasoning concerning the grounds of the claim, the relationship between the *posita* and *petitum*, the parties' legal interests, and evidentiary simplicity. These requirements must remain within the authority established by Supreme Court Regulations.

Small claims proceedings in all three jurisdictions require safeguards for the parties' rights through valid service of summons, opportunities to respond, the examination of evidence, and mechanisms for challenging judgments. Indonesia restricts certain procedural measures, Singapore grants tribunals active authority, and the Philippines permits specific counterclaims under prescribed conditions. Electronic administration supports filing, notification, negotiation, and hearings, each with different requirements. The legal validity of notification and users' ability to access electronic services affect the exercise of procedural rights. In Indonesia, improvements in small claims proceedings should ensure consistent service of summons, clear calculation of time limits for objections, clear explanations of hearing procedures, and proper assessment of evidence. The Supreme Court and the General Courts should strengthen training for judges and court registry personnel through procedural guidelines consistent with applicable law.

Judgment enforcement is governed by distinct requirements concerning the legal effect of judgments, operative provisions, enforcement orders, officers' actions, and satisfaction of obligations. Indonesia applies special rules governing aanmaning alongside the HIR, RBg, and technical enforcement guidelines. Singapore employs civil court procedures to enforce Small Claims Tribunals orders, while the Philippines regulates writs of execution through special rules supplemented by general civil procedure. These differences demonstrate the importance of clearly allocated authority and procedural certainty at each enforcement stage. In Indonesia, improvements

in enforcement administration should address measures following formal judicial warnings, the allocation of costs, asset tracing, identification of property subject to enforcement, and protection of third-party rights. Supervision through PERKUSI must be distinguished from the provision of information to applicants under applicable rules. Certainty in enforcing obligations established by judgments determines whether successful parties obtain satisfaction of their rights.

The Supreme Court and the General Courts should improve consistency in small claims proceedings through technical guidelines, judicial and administrative training, and periodic evaluations. Evaluations should examine the grounds for determining eligibility, valid service of summons, electronic hearings, compliance with procedural time limits, costs, and enforcement outcomes. Issues concerning statutory interpretation should be addressed through guidance issued by the competent authority, while amendments to legal rules require the appropriate regulatory instruments. Further empirical research is needed to examine litigants' experiences, actual costs, case-resolution periods, the availability of assets subject to enforcement, and the extent to which judgment obligations are satisfied. Evaluation indicators should distinguish filing, adjudication, judgment issuance, enforcement applications, and satisfaction of obligations. Empirical comparisons with Singapore and the Philippines must account for differences in institutions, claim categories, and operative provisions. These findings may inform improvements to Indonesian small claims regulations and judicial administration to better protect the legal rights of persons seeking justice.

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