

## **Legal Certainty for Curators in the Implementation of Auctions of Collateral Objects of Bankrupt Debtors (Case Study of Decision Number 557 K/Pdt.Sus-Pailit/2024)**

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### ***Abstract***

*This study investigates the legal guarantees for curators in the administration of collateral assets belonging to debtors declared bankrupt and subject to auction, as stipulated in Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (PKPU). Specifically, this study refers to Decision Number 557 K/Pdt.Sus-Pailit/2024. The discussion includes the regulatory framework regarding legal protection for curators and an examination of the curator's authority to manage collateral assets included in the bankruptcy estate to be auctioned. Using a normative juridical approach along with case studies, the evaluation is based on the application of the law and the protection of the rights of curators and creditors. The study findings indicate that the reviewed decisions confirm the curator's authority to manage and auction collateral assets as part of the bankruptcy estate resolution process. Legal clarity regarding the curator's function is crucial to ensuring that the auction process is carried out effectively, fairly, and in compliance with regulations, while protecting the rights of secured creditors.*

***Keywords: Legal Certainty, Curator, Collateral Object, Bankrupt Debtor, Auction, Supreme Court Decision.***

### **INTRODUCTION**

Within the Indonesian bankruptcy legal framework, a curator plays a crucial role in managing the assets of a debtor declared bankrupt. The curator's responsibilities include safeguarding, administrative management, and liquidation of the bankrupt's assets to equitably and effectively resolve payment obligations to creditors. A significant element of the curator's function is ensuring legal clarity regarding the debtor's collateral assets sold through auction during bankruptcy proceedings. This is crucial because auctioned collateral assets require transparent and fair treatment to legally protect the rights of both creditors and debtors, while also preventing potential future legal disputes.

Supreme Court Decision No. 557 K/Pdt.Sus-Pailit/2024 serves as a significant case study illustrating how the court affirmed the curator's role in managing the collateral assets of bankrupt debtors that were auctioned. This ruling, which rejected the appeal from the curator team of PT Cottonindo Arista Tbk in a bankruptcy case, demonstrates the importance of upholding legal certainty regarding the rights and authorities of curators, while also providing an overview of the legal limitations that curators must adhere to in carrying out their duties.

Legal certainty for curators regarding auctioned collateral assets not only protects creditors' rights but also ensures that the entire auction and asset settlement process proceeds in accordance with applicable law without causing harm to any party. Legally, bankruptcy law grants curators full authority to manage bankruptcy assets, including separating assets that can be immediately auctioned in a legally compliant manner. Therefore, this study will examine the legal certainty of curators in the context of bankrupt debtors' collateral assets auctioned based on the Supreme Court decision, as a reference and learning point for bankruptcy law in Indonesia.

Legal certainty regarding the curator's role in managing auctioned collateral assets is a crucial aspect of bankruptcy practice in Indonesia. The curator is tasked with managing and settling the bankruptcy estate to meet the interests of creditors, including managing collateral pledged by the debtor. However, the implementation of this task often creates legal issues that lead to uncertainty, particularly when the collateral becomes part of the bankruptcy estate and is auctioned by the curator. Decision Number 557 K/Pdt.Sus-Pailit/2024 provides a concrete illustration of the curator's legal position regarding the collateral, affirming the curator's rights and obligations under Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (Bankruptcy Law). This case study is important because it examines the curator's efforts in carrying out their duties, which are not only oriented towards increasing the bankruptcy estate for the benefit of creditors but also consider legal protection for various related parties. Clear legal certainty is essential for the practice of settling bankruptcy estates to be transparent, fair, and avoid legal conflicts that are detrimental to secured creditors and other related parties. The urgency of this research is also driven by the frequent legal ambiguity regarding the limits of the curator's authority over collateral objects that are auctioned off in bankruptcy, thus impacting the effectiveness of the bankruptcy process and the protection of the rights of all parties. Through a review of the latest decisions, this article aims to provide legal clarification and solutions that can serve as a reference in bankruptcy practice in Indonesia. The research method used is normative juridical with a case study approach to relevant court decisions, in order to describe and analyze the legal certainty of curators in the context of collateral objects of bankrupt debtors. Thus, the results of this study are expected to make an important contribution to the development of bankruptcy law, as well as strengthen the principles of justice and legal certainty in Indonesia.

## **METHOD RESEARCH**

The author uses a theoretical normative juridical legal research type, namely by researching, searching, reviewing related books and laws and regulations as well as the scope of theories related to the object being studied. Before conducting the analysis of legal materials, secondary data obtained through library documentation is first organized. The collected legal

materials are then analyzed qualitatively, namely by describing the legal materials in the form of orderly, logical and effective sentences using a normative approach related to the implementation of the sale and purchase of collateral objects.

## **DISCUSSION**

### **1. Regulations on Legal Protection for Curators Based on Law Number 37 of 2004 concerning Bankruptcy and PKPU**

A curator is an individual appointed by the court to manage and settle the assets of a debtor declared bankrupt. The curator is tasked with managing the assets of the bankrupt debtor under the supervision of a supervising judge. The curator's primary duties include managing and settling (liquidating) the bankrupt's assets for the benefit of creditors. In the PKPU (Deferred Assets and Debts Payment) process, the curator plays a role in seeking to restructure the debtor's obligations in order to reach an amicable agreement with the creditors.

Legal Provisions on Curators in Law No. 37 of 2004 explains the duties, authorities, and responsibilities of a curator through various articles: Article 1 number 5 defines a curator as an individual appointed by the court to manage and settle the bankrupt's assets. Article 69 paragraph (1) stipulates that the curator's duties are to manage and/or settle the bankrupt's assets. Article 70 stipulates the requirements for becoming a curator: an individual with specialized expertise, as evidenced by curator education, and registered with the relevant ministry. Article 71 contains provisions regarding the appointment and dismissal of a curator which can be submitted by creditors through a decision of a creditors' meeting (Nico Tri Saputra, 2024).

Law No. 37 of 2004 aims to provide protection not only to debtors and creditors, but also to curators as executors of bankruptcy duties. The legal protections regulated include: Supervision by a supervising judge to ensure that the implementation of the curator's duties is carried out in accordance with the law, provisions requiring curators to carry out their duties independently and impartially, determination of the curator's responsibility for negligence or errors in carrying out their duties, including the possibility of criminal and civil sanctions if they commit unlawful or non-independent acts (Article 234 paragraph 2 and related provisions) (Larmi Kristian, 2018).

However, legal protection for curators in practice is still considered ineffective and does not guarantee legal security for curators in carrying out their duties, so that the curator profession often faces legal challenges and significant risks of liability.

Authority is something delegated or derived from power. It is the right to make decisions, take action, or act based on the responsibility assigned. Another definition of authority is:

1. The right and power to act; authority;
2. The power to make decisions, give orders, and delegate responsibility to others;
3. Functions that may not be performed (Pusat Pembinaan dan Pengembangan Bahasa, 1989).

The curator's authority is a right, meaning the power granted by law to carry out his duties. Authority is always related to the duties and obligations imposed on a person. Therefore, when viewed from the perspective of his authority in bankruptcy cases, analyzing the powers delegated to him, the curator's rights and responsibilities in making decisions, attitudes, and actions. In relation to the curator's authority granted by law in making his decisions, the curator is obliged to see the limitations of authority in the articles regulated by bankruptcy law (Ivida Dewi Amrih Suci, 2009).

The curator's authority must also be reviewed in its historical context, both before and after the authority was granted to the curator. Similarly, the curator's authority must be analyzed. In addition to complying with the authority granted by law, it must also be reviewed

in light of the principles or principles of civil procedural law. This is because the curator's authority falls within the realm of bankruptcy cases, where the Bankruptcy Law stipulates that bankruptcy law is also subject to and adheres to civil procedural law (HIR/RBg).

Bankruptcy cases, according to Article 1 paragraph (1) of the Bankruptcy Law, are cases that arise because an individual or company is declared bankrupt. According to the law, a person is declared bankrupt because the debtor is unable or stops paying their debts, and this must be declared by a court decision. Therefore, if a person is declared bankrupt by a court, the settlement or procedural law, in addition to being subject to the provisions of the Bankruptcy Law, is also subject to and adheres to civil procedural law. The old Bankruptcy Law delegated curatorship authority solely to the Orphans' Estate Office (BHP). The Orphans' Estate Office acts through its proxies within the jurisdiction of the court that declared the debtor bankrupt. As stipulated in the Bankruptcy Law, those who may act as curators under Article 70 of the Bankruptcy Law are: a. the Orphans' Estate Office, and b. other curators. This article also clarifies the definition of other curators as follows: a. a person or individual domiciled in Indonesia who possesses the specialized expertise required to manage and/or settle the bankrupt estate; b. registered with the Ministry of Justice.

Article 69 paragraph (1) of the Bankruptcy Law clearly stipulates that the curator's duty is to manage and/or settle the bankrupt estate. Article 73 paragraph (3) of the KPKPU Law stipulates that a curator appointed for special duties based on a bankruptcy declaration decision has the authority to act independently based on his/her duties. Thus, the curator's authority is limited to the management and settlement of bankrupt assets. Likewise, Article paragraph (8) of the Bankruptcy Law regulates special courts, namely, "A special court is a court that has the authority to examine, try, and decide certain cases that can only be established within one of the judicial bodies under the Supreme Court as regulated by law.

The curator in carrying out his actions must pay attention to matters, one of which is the curator's authority in his actions, adhering to Article 91 of the Bankruptcy Law which stipulates that "all decisions regarding the management and/or settlement of bankrupt assets are determined by the court in the final instance, unless this Law stipulates otherwise." The sale of immovable property privately carried out by the curator in accordance with Article 185 paragraph (2) of the Bankruptcy Law if based on the permission of the supervisory judge, then the application is legally flawed, because it is based on the permission of the supervisory judge who does not have the authority to grant permission or even determine, like the panel of judges in the commercial court who have the authority to make decisions and/or decisions.

Marjan E. Pane is of the opinion that bankruptcy results in the debtor legally losing the authority to control or manage assets that are part of the bankrupt estate (Article 22 of the Bankruptcy Law/currently regulated in Article 21 of Law No. 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations) (Marjan E. Pane, 2004).

Law No. 4 of 1998 concerning the Stipulation of Government Regulation in Lieu of Law No. 1 of 1998 concerning Amendments to the Bankruptcy Law into Law stipulates that this authority is transferred to the curator, so that the curator is the party authorized to manage and settle the assets included in the bankruptcy estate (Article 12 of the Bankruptcy Law, currently regulated in Article 16 of Law No. 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations). The curator has the same authority over the bankruptcy estate as the debtor had over their assets before the bankruptcy.

To effectively carry out their management and settlement duties, the curator must understand what needs to be managed and what needs to be settled. In exercising this authority, it is essential that the curator conduct an inventory and verification of the bankrupt debtor's assets to create a list of assets. The assessment of the bankrupt's assets, if conducted by a curator, must obtain the approval of the supervising judge (Article 91 of the Bankruptcy Law/currently Article 65 of Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment

Obligations). The curator is also responsible for settling the bankrupt's assets and distributing them equally among concurrent creditors (*paritas creditorium*). This distribution is rooted in Articles 1131 and 1132 of the Civil Code. Article 1132 of the Civil Code stipulates that all of the debtor's assets serve as collateral for all creditors. The proceeds from the execution of the debtor's assets are divided equally according to the size of each creditor's claims, unless a creditor has priority over concurrent creditors.

The curator's authority to secure the bankrupt's assets is based on Article 13 of Law No. 4 of 1998 concerning the Stipulation of Government Regulation in Lieu of Law Number 1 of 1998 concerning Amendments to the Law on Bankruptcy into Law, is an authority whose implementation cannot be delayed. This means that as soon as the debtor is declared bankrupt, the duties and legal settlement of the bankrupt estate shall immediately proceed even if the bankrupt debtor files a cassation appeal to the Supreme Court against the decision. More importantly, the debtor, based on Article 22 of the Bankruptcy Law, cannot obstruct or take actions to refuse the presence of the curator who is on duty on the orders of the Bankruptcy Law, because the authority to manage and settle the bankrupt estate has been taken over by the curator (Ricardo Simanjuntak, 2003).

If not interpreted correctly, some of the curator's powers outlined in the Bankruptcy Law will render the curator an institution with broad powers. This will result in the curator being an unlimited institution, potentially leading to the management and settlement of the bankrupt's assets being carried out beyond its authority. The curator's powers, as described above, are often regulated in ways that deviate from principles in other legal fields. These deviations are desired by the law, and the permissibility of such deviations is a distinct characteristic of bankruptcy law (Ivida Dewi Amrih Suci, 2018).

One of the regulatory differences between the Bankruptcy Law and other laws is the inclusion of individual curators appointed by the Court in a bankruptcy decision. The law's unique characteristic of including individuals is a distinct feature that distinguishes it from other legal regulations. The Bankruptcy Law regulates the permission of individuals to serve as curators in the future legal concept, which was created when this law was enacted. This needs to be examined to understand the intention of the lawmakers to place power in the hands of individuals other than the Estates Office (BHP).

That the analysis of the duties and authorities of the curator in the settlement and management of bankruptcy in bankruptcy law is very broad. The curator based on Article 69 paragraph (1) is also explicitly given the authority to transfer the debtor's bankrupt assets without the debtor's consent, but this law does not regulate at all regarding the curator's authority if the bankrupt assets, especially immovable objects, are not in the name of the debtor. The authority to transfer immovable objects which are part of the bankrupt assets which are not in the name of the debtor privately still requires a process, for example with power of attorney or the presence of both parties.

## **2. Legal Certainty of the Curator in the Object of Collateral of Bankrupt Debtors Auctioned in Decision Number 557 K/Pdt.Sus-Pailit/2024**

Law Number 37 of 2004 concerning Bankruptcy regulates the Management of Bankrupt Assets. Bankruptcy or *bankruptcy* is a condition where a debtor has difficulty in paying his debts to creditors, so bankruptcy means a process when a debtor is declared bankrupt by the court because he has financial difficulties in paying his debts. Bankruptcy is a condition where the debtor is unable to make payments on debts from his creditors, while Bankruptcy according to the UUK is a general seizure of the assets of a bankrupt debtor whose management and settlement are carried out by a curator under the supervision of a supervising judge (Astri Ester Silalahi, 2023).

A bankruptcy decision that has the power of *Uit Voerbaar Bij Vooraad* or an immediate decision, a decision that declares the debtor bankrupt must still be implemented first even though the decision does not yet have permanent legal force. Since the bankruptcy decision is pronounced, he loses the right to manage and assign his assets (*persona Standi in Iudicio*). The curator, who is a person appointed by the court to manage and settle the debtor's bankruptcy estate, must carry out his duties in accordance with applicable laws and regulations. The curator must also pay attention to the condition of the bankrupt, meaning that if deemed necessary, for the sake of the bankrupt's living needs, the curator must pay the bankrupt's living allowance. When carrying out his duties, the curator also has responsibility for errors or negligence that result in losses to the bankrupt's assets when carrying out the duties of managing or settling the bankrupt's assets in question, as referred to in Article 72 of the KPKPU Law.

The many tasks and responsibilities assigned to the curator result in the curator facing many obstacles, such as non-cooperative actions and other psychological actions carried out by the bankrupt debtor and bankrupt creditors (Aditya Pratama dan Parulian Paidi Aritonang, 2023). Bankruptcy is a solution for debtors to be able to get out of the debt problems that are pressing them, because the debtor no longer has the ability to pay debts to his creditors (Dedy Tri Hartono, 2016). Bankruptcy law in principle is a general seizure of all the assets of a bankrupt debtor, both existing and future, with the main objective being to use the proceeds from the sale of these assets to pay all the debts of the bankrupt debtor proportionally (*prorate parte*) and in accordance with the creditor structure (Hadi Shubhan, 2008).

Bankruptcy is a general seizure of all the assets of a bankrupt debtor, the management and settlement of which is carried out by a curator under the supervision of a supervisory judge. The bankruptcy assets will be distributed according to the proportion of the creditors' claims. This bankruptcy principle is a realization of the provisions of Article 1131 and the Civil Code, namely that the debtor's assets become joint collateral for all creditors, which are divided according to the principle of balance or "*Pari Pasu Prorata Parte*" (Jerry Hoff, 2020).

Bankruptcy Law aims to ensure a fair and proportional distribution of the debtor's assets to each creditor, unless there are creditors who, according to law, must receive priority in receiving payment of their bills. This ensures greater security and safeguards the interests of all parties involved. The implementation of general confiscation must avoid confiscation and execution by creditors individually. Creditors must act collectively (*concursum creditorium*) in accordance with the principles stipulated in Article 1132 of the Civil Code. Bankruptcy law in Indonesia has undergone several changes since the enactment of the *Faillissements Verordening Stb. 1905 No. 217* in conjunction with *Stb. 1906 No. 348*, up to the most recent amendment through Law of the Republic of Indonesia Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (Bankruptcy Law and PKPU).

In every court decision, the panel of judges certainly has considerations before making a decision as outlined in the court decision. The judge's considerations are an important thing as a reference for determining the Court Decision. In decision Number: 557 K/Pdt.Sus-Pailit/2024, the panel of judges considered that the Curator's authority is very broad in carrying out its functions and roles after the bankruptcy decision is determined by the court, and under the Bankruptcy Law, when the Curator manages the bankruptcy estate, the Curator is not required to obtain approval from or provide prior notification to the Debtor or one of the Debtor's organs, even though in circumstances outside of bankruptcy such approval or notification is required (Article 69 paragraph 2 letter a).

Based on these considerations, it can be concluded that the judge's considerations in this decision are in line with Article 69 paragraph (2) letter a of the Bankruptcy Law and PKPU, which regulates that in carrying out its duties, the Curator is not required to obtain approval

from or provide prior notification to the Debtor or one of the Debtor's organs, even though in circumstances outside of bankruptcy such approval or notification is required. Not only is there a requirement under the law, but there are also several tasks that require approval from the supervising judge, and other duties or authorities are not explained in the Bankruptcy Law regarding whether or not approval from the supervising judge is required. Essentially, a curator must act in the best interests of the creditors, but in carrying out their duties, the curator must also continue to consider the interests of the bankrupt debtor (Firmansyah, 2013).

The ruling affirmed that the auction for the execution of mortgage rights over the collateral, consisting of land and buildings in the name of PT. Cottonindo Ariesta, conducted by the bank (PT. Bank Central Asia Tbk) through an auction service, was valid and in accordance with applicable law. Although the collateral constituted the bankrupt's assets, the Supreme Court stated that the auction did not harm the bankrupt's assets because it was stipulated in banking and financial regulations that permit banks to take over collateral assets (AYDA) through auction if the debtor fails to fulfill their obligations to the bank. This ruling referred to Financial Services Authority Regulation (POJK) Number 2/POJK.03/2022 concerning Bank Asset Quality Assessment and the Law on the Development and Strengthening of the Financial Sector in conjunction with the Banking Law, which explicitly stipulates that banks can purchase collateral through auction if the debtor defaults. This provides a strong legal framework for the curator's actions in managing and settling the bankrupt's assets, including the collateral being auctioned.

This decision confirms that curators have legal certainty when carrying out their duties related to the management of bankrupt assets, including collateral objects subject to auction. Curators cannot obstruct legally valid auctions, so that banks' auctions of collateral objects belonging to bankrupt debtors do not violate bankruptcy regulations. This places curators in a position to respect and implement auction decisions in accordance with banking and bankruptcy regulations. Supreme Court Decision No. 557 K/Pdt.Sus-Pailit/2024 provides legal certainty that auctions of collateral objects belonging to bankrupt debtors by banks through legitimate mechanisms do not harm the bankrupt estate and must be respected by curators as part of the management of the bankrupt estate. This strengthens the legality of curator and bank actions in the bankruptcy context, ensuring legal protection and legal certainty in the bankruptcy collateral auction process.

## **Conclusion**

Legal force is a valid decision, meaning that a decision can influence legal relations and become jurisprudence. The judge's decision must be obeyed and implemented, so that it obtains legal certainty. The curator in a bankruptcy case whose power is analyzed delegated to him, is the curator's right and responsibility in making decisions, attitudes or actions, the curator's authority falls within the realm of bankruptcy cases, where the considerations of the Bankruptcy Law stipulate that bankruptcy law is also subject to and complies with civil procedural law (HIR/RBg). The judge's consideration in decision Number: 557 K/Pdt.Sus-Pailit/2024, states that the bankrupt debtor must still be implemented first even though the decision does not yet have permanent legal force. That the judge's considerations in this decision are in line with the Bankruptcy and PKPU Law, Article 69 paragraph (2) letter a, which states "in carrying out his duties, the curator is not required to obtain approval from or provide prior notification to the debtor or one of the debtor's organs, even though in circumstances outside of bankruptcy such approval or notification is required."

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