

EFFORTS TO PROTECT THE LEGAL AGAINST CURATORS IN THE PROCESS OF SETTLING BANKRUPTCY ASSETS REVIEWED FROM THE BANKRUPTCY LAW (STUDY ON HKPI- COORDINATION OF THE MEDAN REGION)

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ABSTRACT

This study aims to analyze the legal arrangements regarding the position, authority, and responsibilities of curators in the process of settling bankruptcy assets based on Law Number 37 of 2004 concerning Bankruptcy and Postponement of Debt Payment Obligations, as well as examining the role of curatorial organizations in providing legal protection against the risks of civil, criminal, and ethical lawsuits faced by curators. This study uses a normative juridical method with a legislative and conceptual approach. Data were obtained through documentation studies, observations, and interviews, then analyzed descriptive-analytically. The results of the study show that the existing legal arrangements have not comprehensively regulated the limits of curatorial authority and accountability, thus creating legal vulnerabilities in practice. Curatorial organizations play a role in providing preventive protection through education and code of ethics, as well as repressive protection through advocacy and legal assistance. However, limited organizational authority and resources hinder the effectiveness of protection, so it is necessary to strengthen regulations and institutions.

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INTRODUCTIONS

Bankruptcy is one of the legal instruments that has a strategic position in the modern economic legal system. The existence of bankruptcy law cannot be separated from the dynamics of business activities and the increasingly complex debt-receivables legal relationship. Under ideal conditions, the legal relationship between the debtor and the creditor takes place normally, where the debtor fulfills his obligations in accordance with the agreed agreement. However, in practice, it is not uncommon for debtors to experience financial difficulties that lead to the inability to fulfill their obligations to creditors. In such a situation, bankruptcy law is present as a settlement mechanism that aims to provide legal certainty, justice, and protection for the interests of all parties involved. (Eddy & Hasibuan, 2024)

In Indonesia, the bankruptcy legal regime is regulated in Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (Bankruptcy Law). This law is a refinement of the previous regulation and is intended to create a more effective, transparent, and legal certainty for business actors. One of the fundamental provisions in the Bankruptcy Law is the regulation regarding the curator as the party responsible for the management and settlement of bankruptcy assets under the supervision of the supervisory judge.

Curatorship is a legal profession that has a central and decisive role in the entire bankruptcy process. Since the bankruptcy judgment is pronounced by the commercial court, the debtor loses the right to control and manage his assets, and the authority legally passes to the curator. Thus, the curator functions as the main organ of bankruptcy that acts not only as an executor of court decisions, but also as a manager of the interests of creditors and other interested parties in the bankruptcy bankruptcy. (Harefa & Habeahaan, 2025; Princess, 2024)

In carrying out their duties, curators are equipped with very broad legal authority. These authorities include securing bankruptcy assets, recording and inventorying assets, managing the debtor's business under certain circumstances, selling bankruptcy assets, and distributing settlement proceeds to creditors according to their level and position. This broad authority requires curators to have professional competence, moral integrity, and a deep understanding of the law, because every action taken will have a direct impact on the rights and interests of the parties.

However, the breadth of this authority also carries consequences in the form of high legal risks that must be faced by curators. In practice, curators are often in a dilemmatic position. On the one hand, the curator is required to act quickly and decisively in clearing the bankruptcy assets to provide certainty for creditors. On the other hand, any action taken has the potential to raise objections, lawsuits, or even criminal reporting from parties who feel aggrieved, especially bankrupt debtors or certain creditors.

It is not uncommon for the actions of curators, which are actually the exercise of the authority of the law and court decisions, to be questioned legally. Curators can be sued civilly on the basis of unlawful acts, accused of negligence in the management of bankruptcy estates, or even criminally reported for allegations of embezzlement and abuse of authority. This condition suggests that the curatorial profession is in a very vulnerable position legally, although curatorship acts in principle as an extension of the court. (Hamonangan et al., 2021; Siagian & Lyanti, 2025)

This problem is exacerbated by the fact that the Bankruptcy Law has not expressly regulated the form of legal protection for curators. This law does regulate the duties, authorities, and responsibilities of curators, but does not provide clear normative limits on the legal liability of curators, especially related to actions carried out in good faith and in accordance with legal procedures. The absence of such regulation creates a wide scope for interpretation and has the potential to cause legal uncertainty.

In the doctrine of bankruptcy law, the liability of the curator is generally based on the principle of fault (*liability based on fault*). This means that the curator can only be held legally accountable if proven to have made a mistake or negligence in carrying out his duties. However, in law enforcement practice in Indonesia, this principle is not always applied consistently. Curators often still have to face a long and exhausting legal process even if they are ultimately not proven guilty. (Prawira, 2021; Princess, 2024)

This legal uncertainty has the potential to have a negative impact on the effectiveness of the bankruptcy system as a whole. Curators can be overly cautious in making decisions, so that the process of settling bankruptcy assets becomes slow and inefficient. In addition, this condition can also reduce the interest of legal professionals in carrying out the curatorial profession, considering the high legal risks that must be borne compared to the available legal protections.

It is in this context that the existence of curatorial organizations becomes very relevant. Curatorial organizations function as a professional forum that aims to maintain the standards of competence, professionalism, and integrity of its members. Through curator organizations, coaching, certification, ethical supervision, and capacity building are carried out for curators to be able to carry out their duties professionally and responsibly.

In addition, curatorial organizations also have a strategic role in providing legal protection to their members. This protection can be in the form of legal assistance, advocacy, and ethical defense if members of the organization face legal problems in carrying out their duties as curators. However, the role of curatorial organizations in providing legal protection still faces various limitations, both in terms of normative authority and juridical binding power on external parties. (Eddy & Hasibuan, 2024; Syahputra & Hoesein, 2025)

The limitations of the role of curatorial organizations show that legal protection of curators cannot depend solely on the internal mechanisms of the profession. A clearer and more comprehensive legal arrangement is needed in the Bankruptcy Law to provide certainty and legal protection for curators. The arrangement is expected to confirm that curators cannot be held legally liable as long as they act in good faith, in accordance with the authority granted by the law and court decisions.

Based on this description, it can be seen that there is a gap between the amount of responsibility and authority of the curator and the lack of legal protection provided by laws and regulations. This gap raises complex legal issues and has the potential to disrupt the effectiveness of the bankruptcy system. Therefore, the research on Legal Protection Efforts for Curators in the Process of Liquidating Bankruptcy Assets is reviewed from the Bankruptcy Law (Study on the Indonesian Association of Curators and Administrators - Medan Regional Coordination).

This research aims to examine in depth the legal protection arrangements for curators in the Bankruptcy Law and analyze the role of curatorial organizations in providing legal protection to their members. Thus, this research is expected to make a theoretical contribution to the development of bankruptcy law in Indonesia and provide practical recommendations for law makers, law enforcement officials, and curatorial organizations in strengthening legal protection for the curatorial profession.

METHOD

This research was carried out for six months, namely June to December 2025, after the author completed the proposal seminar and the improvement stage. The location of the research is in the city of Medan, precisely at the Office of the Indonesian Association of Curators and Administrators (HKPI) in the Medan Region. The selection of the location is based on considerations of accessibility and relevance of data, so that researchers can obtain complete, accurate, and adequate information according to the needs of the research. (Satory et al., 2024; Yanova et al., 2023)

This study uses a normative juridical approach with a descriptive-analytical nature. This approach places law as a written norm (law in books) that is analyzed through laws and regulations, court decisions, and legal doctrine. The legal materials used include primary and secondary legal materials. The focus of the research is directed at doctrinal analysis of legal arrangements related to the position, authority, and responsibilities of curators, as well as the legal protections provided in the bankruptcy system.

Data collection was carried out through observation, documentation studies, and in-depth interviews with the main informant, namely Dr. Enni Martalena Pasaribu, S.H., M.H., M.Kn., who was chosen because of his competence and experience in the field of bankruptcy. The collected data is analyzed qualitatively by systematically decomposing and classifying the information. The analysis process is carried out inductively, that is, drawing general conclusions based on specific facts found during the research.

RESULT AND DISCUSSIONS

Legal Arrangements Regarding the Position, Authority, and Responsibilities of Curators in the Process of Liquidating Bankruptcy Assets Based on Law Number 37 of 2004 concerning Bankruptcy and Postponement of Debt Payment Obligations

Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations (hereinafter referred to as the Bankruptcy Law) places the curator as one of the main organs in the bankruptcy system. This is expressly reflected in Article 1 number 1 of the Bankruptcy Law which states that bankruptcy is a general confiscation

of all assets of a bankruptcy debtor whose management and settlement are carried out by the curator under the supervision of the supervisory judge.

This provision shows that the curator is not just an administrative executor, but a legal subject who carries out judicial-executive functions on the basis of laws and court decisions. The position of the curator has become very central because since the bankruptcy decree was pronounced, all the debtor's authority to control and manage his assets has shifted to the curator. (Harir et al., 2025; Ranovianto & Lyanthi, 2024)

In the doctrine of bankruptcy law, the curator is seen as an organ of bankruptcy (*organ van het faillissement*) that acts in the interests of the bankrupt boedel and the creditors collectively. The curator does not represent the interests of a particular debtor or creditor, but rather acts independently for the broader legal interest. The curator is a central actor in the bankruptcy process, especially in the stage of settling the bankruptcy property. The curator's extensive authority in managing and clearing bankruptcy assets puts him in a position vulnerable to legal risks. In practice, curators often face civil lawsuits, criminal reports, and ethical sanctions. This condition raises fundamental questions about the form of legal protection that should be provided to curators, both through regulations and through professional organization mechanisms.

Curatorial organizations are one of the important instruments in providing legal protection, because professional organizations have functions as internal control institutions, competency development, and advocacy for members. In the context of bankruptcy, the role of the curator's organization is not only administrative, but also strategic to maintain the independence and professionalism of the curator. (Hindrawan et al., 2023; Ranovianto & Lyanthi, 2024)

Legal protection in general is a guarantee of rights, obligations, and legal certainty for legal subjects in carrying out their activities. In the curatorial profession, legal protection means a guarantee that the curator can exercise his authority without fear of facing disproportionate legal risks. Legal protection also includes preventive and repressive efforts carried out by state institutions and professional organizations. Curatorial organizations often organize trainings, seminars, and workshops that discuss the development of bankruptcy law, settlement techniques, bankruptcy management, and current issues. This training aims to improve the competence of curators to be able to carry out their duties professionally. (Sibarani, 2025)

The interview was conducted with Dr. Enni Martalena Pasaribu, S.H, M.H, M.Kn, an experienced curator who has handled various bankruptcy cases on both small and large scales. According to Dr. Enni Martalena Pasaribu, S.H, M.H, M.Kn, Bankruptcy is changing quickly. Many court rulings affect curatorial practice. If we don't participate in training, we will easily make a mistake. The organization is always having updates, and that helps a lot.

This statement affirms that continuing education not only improves technical capabilities, but also becomes a tool of preventive protection because curators can prove that their actions are based on professional standards and correct legal understanding. Legal protection for curators in the process of settling bankruptcy assets is an important issue in the bankruptcy system. Curators have broad authority, but their legal positions are still vulnerable to civil, criminal, and ethical risks. Legal protection efforts for curators can basically be carried out through two main channels, namely: (1) strengthening legislative arrangements, and (2) strengthening the institutional organization of curators as professional institutions.

However, in reality, these protection efforts face various obstacles that are quite complex. These obstacles arise from the side of regulations that are not firm and harmonious, as well as from the side of professional organizations that do not have adequate institutional strength and resources. In this context, it is necessary to analyze in depth the obstacles that hinder the legal protection of curators so that the proposed solution has a clear and implementable direction. (Puspitasari et al., 2021; Stuart & Lie, 2026)

Law Number 37 of 2004 concerning Bankruptcy and Suspension of Debt Payment Obligations has provided the basis for the authority and duties of curators, but has not expressly regulated the form of legal protection for

curators in carrying out their functions. This ambiguity creates legal uncertainty, because curators are often faced with civil lawsuits and criminal reports that are not always in harmony with the context of carrying out their duties. Juridically, legal protection ideally includes limitation of liability, exclusion of liability within certain limits, protection mechanisms against unwarranted criminal prosecutions, and guarantees of independence from the intervention of interested parties. The current provisions are still general and have not accommodated proportional protection. In practice, curators are often sued for the act of selling assets that are considered to be detrimental to certain creditors, even though these actions are carried out based on court decisions and professional considerations. (Arimba, 2024)

The problem is increasingly complex because of the disharmony between bankruptcy law and criminal law. A legitimate curatorial act under bankruptcy law can be interpreted as a criminal act, such as embezzlement or fraud, due to the difference in the construction of the element of liability in criminal law. Criminal law assesses acts based on subjective and objective elements that do not always consider the context of curatorial authority derived from court decisions. This condition opens up room for the criminalization of the profession, especially when dissatisfied creditors report the curator for decisions that are actually taken based on market conditions and professional considerations.

Uncertainty is also seen in the concept of curatorial responsibility which has not been clearly formulated whether it is fault-based or strict liability. The ambiguity of this norm gives rise to different interpretations in court and magnifies the risk of disproportionate lawsuits. Many disputes arise not because of real mistakes, but because of dissatisfaction with the results of the settlement of bankruptcy assets. This situation shows that the legal risks faced by curators often exceed the limits of their professional authority. (Inaya et al., 2025; Saebani, 2024)

Supervision of the performance of curators who are normatively under the supervisory judge has also not been effective and consistent. Limited time, complexity of cases, and judicial resources cause the control function to be suboptimal. As a result, the curator's decision is vulnerable to questioning in the future, both administratively and through civil lawsuits. This weak supervision not only puts curators in a vulnerable position, but also has the potential to lower the standard of professionalism in bankruptcy practice.

The aspect of curatorial independence also faces challenges because there is no strong guarantee of protection against the intervention of interested parties, such as dominant creditors or debtors. Pressure can arise in the form of threats of lawsuits, economic pressure, or other informal influences that have the potential to affect the objectivity of the curator's decision. The absence of financial protection provisions, such as professional insurance or guarantee funds, further increases the risks that must be borne personally. Without a financial protection mechanism, the curator works in a risky situation that can affect the courage and professionalism in making strategic decisions in the interests of Boedel and all creditors.

Constraints of the Institutional Aspect of the Curator's Organization

Curatorial organizations are basically non-state institutions that do not have the force of executory law, so the protection that can be provided to its members is internal and limited to coaching, a code of ethics, and the application of organizational disciplinary sanctions. This limitation is a major obstacle when curators face civil lawsuits or criminal proceedings, as the organization does not have the authority to stop or cancel ongoing legal proceedings. Dr. Enni Martalena Pasaribu, S.H., M.H., M.Kn. emphasized that the organization can only provide moral, administrative, and recommendation support documents, while the legal process remains within the authority of law enforcement officials and the courts.

Another obstacle lies in the limited resources of the organization, both in terms of funding and the availability of experts. This condition limits the organization's ability to provide comprehensive legal assistance to all its members. Not all curators who face disputes can obtain optimal legal assistance, especially in the form of providing legal counsel

for bankruptcy specialists for free. The protection that organizations provide ends up being uneven and highly dependent on the internal capacity of each organization. (Arapenta et al., 2024; Asyidqi et al., 2023; Disemadi & Gomes, 2021)

The problem is also exacerbated by the lack of a documented system and a structured case database. Dispute data involving curators is often scattered and not documented systematically, making it difficult for organizations to analyze case patterns, evaluate risks, and formulate targeted coaching strategies. Dr. Enni Martalena Pasaribu stated that weak data systems cause coaching and protection programs to be reactive, not based on measurable strategic planning.

The internal discipline mechanism that has not been effective also affects the credibility of the organization. Despite the existence of a code of ethics, its implementation is often hampered by the lack of an independent ethics committee, lack of transparency in the audit process, and unclear sanctions. This condition weakens the standard of professionalism and has an impact on the decline of the organization's bargaining power in providing legal protection to its members. (Apriyanto & Wulandari, 2026; Br Siahaan, 2024; Harir et al., 2025)

From the external side, curatorial organizations have not fully gained strong recognition and legitimacy in the eyes of the public and the government. This limited recognition hinders the role of organizations in policy advocacy and in the process of forming regulations related to the curatorial profession. Organizational fragmentation, which is characterized by many similar organizations without uniform standards, further weakens the position of professional advocacy. Differences in standards and unintegrated coordination cause the collective power of curators to be divided, especially when dealing with major cases or regulatory changes.

The limited role of organizations in the legislation process also emphasizes this problem. Curatorial organizations do not always have direct access to the formulation or revision of the Bankruptcy Law, so the aspirations of professional protection have not been optimally accommodated. The link between regulatory weaknesses and organizational limitations creates a vulnerable condition for curators, because the broad authority possessed in the settlement of bankruptcy assets is not balanced by adequate legal protection mechanisms. This situation puts curators in a position that is prone to question, while organizations have not been able to provide maximum protection. (Alif et al., 2026; Husni et al., 2025; Sukma et al., 2023)

Efforts to overcome these obstacles require a comprehensive approach. Revisions of the Bankruptcy Law need to be carried out to clarify the limits of liability, protection mechanisms, and the possibility of implementing professional insurance. Harmonization between bankruptcy law and criminal law is also needed so that curatorial actions carried out in the context of carrying out duties are not necessarily qualified as criminal acts. Strengthening organizational institutions through increased resources, the development of systematic case databases, the establishment of transparent disciplinary mechanisms, and official recognition by the government are strategic steps to strengthen the organization's position in providing effective legal protection for curators.

CONCLUSION

This study concludes that the legal regulation regarding the position, authority, and responsibilities of curators in Law Number 37 of 2004 places curators as the main organ of bankruptcy that carries out public functions under the supervision of supervisory judges. The Curator has broad authority in the securitization, management, and settlement of bankruptcy assets, including the sale of assets and the preparation of distribution lists to creditors. However, the regulation on the limits of curatorial liability has not been balanced with a clear legal protection mechanism. The absence of firm regulations regarding the limitation of civil and criminal liability leaves curators vulnerable to lawsuits and potential criminalization, even though the actions taken are sourced from laws and court rulings.

The research findings also show that curatorial organizations play a strategic role in providing legal protection for their members through preventive and repressive approaches. Preventively, organizations carry out competency

development, continuing education, certification, preparation of practice guidelines, and code of ethics enforcement. Repressively, the organization provides legal assistance, litigation assistance, reputation advocacy, and dispute resolution facilitation. This role is proven to help maintain the curator's professionalism and legal position. However, the effectiveness of such protection is still limited because organizations do not have strong normative authority like state institutions.

This study identifies that the constraints of legal protection for curators come from regulatory and institutional aspects. In terms of regulation, problems include unclear protection norms, disharmony between bankruptcy law and criminal law, uncertainty in the concept of responsibility, weak supervision, and the absence of financial protection mechanisms such as professional insurance. From the institutional side, the obstacles include limited organizational authority and resources, weak case documentation systems, ineffective internal disciplinary mechanisms, lack of public legitimacy, and fragmentation of curatorial organizations. This condition shows the need for normative and institutional strengthening so that curators can carry out their duties independently, professionally, and be protected from disproportionate legal risks.

REFERENCES

- Alif, V., Abdullah, A., & Purwaningrum, D. (2026). Upaya Perlindungan Hukum bagi Pihak Ketiga yang Asetnya Termasuk dalam Harta Pailit. *Jurnal Hukum Lex Generalis*, 6(12), 1–10. <https://doi.org/10.56370/jhlg.v6i12.2378>
- Apriyanto, H., & Wulandari, M. (2026). Perlindungan Hukum terhadap Kriminalisasi bagi Profesi Kurator dan Pengurus Berdasarkan Undang-Undang Nomor 37 Tahun 2004 tentang Kepailitan dan PKPU. *Collegium Studiosum Journal*, 8(2), 1–12. <https://doi.org/10.56301/csj.v8i2.2063>
- Arapenta, D. C., Karsona, A. M., & Sari, D. Y. (2024). Perlindungan Hukum terhadap Tenaga Kerja Sebagai Kreditur Istimewa. *Jurnal USM Law Review*, 7(3), 2054–2069. <https://doi.org/10.26623/julr.v7i3.10103>
- Arimba, C. I. (2024). Tanggung Jawab Hakim Pengawas terhadap Harta Pailit. *Begawan Abioso*, 14(2), 71–86. <https://doi.org/10.37893/abioso.v14i2.708>
- Asyidqi, A. T., Safitri, N., Suryanti, N., & Yuanitasari, D. (2023). Upaya Hukum bagi Pihak Debitur atas Kesalahan Penaksiran Nilai Utang oleh Kurator Berdasarkan Hukum Kepailitan. *Jurnal Tana Mana*, 4(2), 229–238. <https://doi.org/10.33648/JTM.V4I2.278>
- Br Siahaan, Y. T. (2024). Analisis Yuridis Pertanggungjawaban Pidana Kurator terhadap Tindak Pidana Penggelapan dalam Proses Pemberesan Harta Pailit. *Law, Development and Justice Review*, 7(2), 175–191. <https://doi.org/10.14710/ljdr.7.2024.175-191>
- Disemadi, H. S., & Gomes, D. (2021). Perlindungan Hukum Kreditur Konkuren dalam Perspektif Hukum Kepailitan di Indonesia. *Jurnal Pendidikan Kewarganegaraan Undiksha*, 9(1), 1–11. <https://ejournal.undiksha.ac.id/index.php/JJPP/article/view/31436>
- Eddy, T., & Hasibuan, H. (2024). Mekanisme Pemberesan Harta Pailit di Indonesia. *Jurnal Pengabdian Masyarakat Pengabdian Pencerahan Bangsa*, 2(2), 1–10. <https://jurnal.mediapencerahanbangsa.co.id/index.php/ppb/article/view/148>
- Hamonangan, A., Lubis, M. A., Taufiqurrahman, M., & Silaban, R. (2021). Peranan Kurator terhadap Kepailitan Perseroan Terbatas. *Jurnal Pengabdian Kepada Masyarakat Maju UDA*, 2(1), 20. <https://doi.org/10.46930/pkmmajuuda.v2i1.1182>
- Harefa, R. L. M., & Habeahaan, B. (2025). Tanggung Jawab Kurator Atas Berkurangnya Nilai Harta Pailit Selama Dilakukannya Pengurusan. *Jurnal Media Informatika*, 6(6), 2929–2933. <https://doi.org/10.55338/JUMIN.V6I6.7460>
- Harir, M., Soegianto, S., Arifin, Z., Sudarmanto, K., & Arifin, M. (2025). Konflik Norma (Antinomy Normen) Sita Umum dengan Sita Pidana dalam Pemberesan Harta Pailit. *Jurnal USM Law Review*, 8(2), 1107–1125. <https://doi.org/10.26623/julr.v8i2.11384>



- Hindrawan, P., Sunarmi, S., Ginting, B., & Harianto, D. (2023). Tanggung Jawab Kurator dalam Menerapkan Asas Pari Passu Prorata Parte dalam Pengurusan dan Pemberesan Harta Pailit. *Locus Journal of Academic Literature Review*, 2(8), 720–732. <https://doi.org/10.56128/LJOALR.V2I8.223>
- Husni, I., Hakim, N., & Pandiangan, R. (2025). Perlindungan Hukum terhadap Kurator Terkait Fee/Imbalan Jasa dalam Melaksanakan Proses Going Concern Kepailitan. *Sinergi: Jurnal Riset Ilmiah*, 2(8), 3927–3938. <https://doi.org/10.62335/sinergi.v2i8.1739>
- Inaya, A., Bustami, D. S., & Hasbi, H. (2025). Pertanggungjawaban Yuridis terhadap Perlindungan Hukum Kreditor Pemegang Jaminan Fidusia dalam Terjadinya Pailit oleh Debitur. *Legal Dialogica*, 1(1), 1–11. <https://jurnal.fh.umi.ac.id/index.php/legal/article/view/1592>
- Prawira, M. S. N. (2021). Pertanggungjawaban Kurator Karena Menyebabkan Timbulnya Kerugian Dalam Pemberesan Harta Pailit. *Dinamika (Jurnal Ilmiah Ilmu Hukum)*, 27(5), 662–678. <https://jim.unisma.ac.id/index.php/jdh/article/view/9395>
- Puspitasari, L. N., Septiandani, D., Ratna Sediati, D. S., & Sukarna, K. (2021). Problematika Eksekusi Harta Pailit dalam Cross Border Insolvency. *Jurnal USM Law Review*, 4(2), 743–755. <https://doi.org/10.26623/julr.v4i2.4238>
- Putri, I. A. (2024). Perlindungan Hukum bagi Kreditor Separatis dalam Pembagian dan Pemberesan Harta Pailit. *Jaksa : Jurnal Kajian Ilmu Hukum Dan Politik*, 2(2), 299–305. <https://doi.org/10.51903/JAKSA.V2I2.1702>
- Ranovianto, A. R., & Lyanthi, M. E. (2024). Tanggung Jawab Perdata atas Tindakan Lalai Kurator dalam Kepengurusan Harta Pailit (Boedel Pailit). *Journal Publicuho*, 7(3), 1054–1064. <https://doi.org/10.35817/publicuho.v7i3.457>
- Saebani, A. R. (2024). Perlindungan Hukum dan Upaya Pemulihan bagi Perusahaan Insolven dalam Kepailitan. *Jurnal Hukum Statuta*, 3(2), 92–100. <https://doi.org/10.35586/JHS.V3I2.9097>
- Satory, A., Febrianty, Y., Astuti, widiyanti R. B., & Pradana, A. F. K. (2024). Metode Penelitian Hukum. In *Penerbit Tahta Media*. Tahta Media Group. <http://tahtamedia.co.id/index.php/issj/article/view/1031>
- Siagian, O. D., & Lyanti, M. E. (2025). Perlindungan Hukum Kreditor Separatis dan Peran Kurator dalam Menjaga Keseimbangan Kreditor dalam Proses Kepailitan di Indonesia. *Media Hukum Indonesia (MHI)*, 3(2), 587–590. <https://doi.org/10.5281/ZENODO.15732464>
- Sibarani, T. W. R. (2025). Tinjauan Yuridis Mengenai Peran Kurator dalam Pengurusan dan Pemberesan Harta Pailit. *Jurnal Pendidikan Sejarah Dan Riset Sosial Humaniora*, 5(1), 13–20. <https://ejournal.penerbitjurnal.com/index.php/humaniora/article/view/1034>
- Sukma, C. A., Citra, H., & Sommaliagustina, D. (2023). Kedudukan Kurator dalam Pemberesan Harta Pailit Sesuai Undang-Undang No. 37 Tahun 2004. *Judakum: Jurnal Dedikasi Hukum*, 2(3), 216–223. <http://103.241.192.17/~jurnalunidha/index.php/JDH/article/view/1204>
- Syahputra, M. A., & Hoesein, Z. A. (2025). Optimalisasi Tanggung Jawab Kurator dalam Pengelolaan Harta Pailit Berdasarkan Undang-Undang Nomor 37 Tahun 2004. *Jurnal Retentum (Jurnal Prodi Ilmu Hukum Pasca Sarjana Universitas Darma Agung)*, 4(2), 81–92. <https://doi.org/10.46930/RETENTUM.V7I1.5274>
- Umaternate, A., & Lie, G. (2026). Analisis Yuridis Peran Kurator dalam Pengurusan dan Pemberesan Harta Pailit Berdasarkan Undang - Undang Nomor 37 Tahun 2004 tentang Kepailitan dan PKPU. *Nusantara : Jurnal Ilmu Pengetahuan Sosial*, 13(1), 69–78. <https://doi.org/10.31604/JIPS.V13I1.2026.69-78>
- Yanova, M. H., Komarudin, P., & Hadi, H. (2023). Metode Penelitian Hukum: Analisis Problematika Hukum dengan Metode Penelitian Normatif dan Empiris. *Badamai Law Journal*, 8(2), 394–408. <https://doi.org/10.32801/DAMAI.V8I2.17423>