

# Return of Dowry in Annulment Of Marriage in Parepare Religious Court (Critical Review of Decision Number: 372/Pdt.G/2019/PA. Pare)

Rusdaya Basri<sup>1</sup>, Rahmawati<sup>2</sup>, Ahmad Fadly<sup>3</sup>, Farouq Ahmad Ali R.Miru<sup>4</sup>  
Postgraduate IAIN Parepare<sup>1</sup>, Postgraduate IAIN Parepare<sup>2</sup>, Postgraduate IAIN Parepare<sup>3</sup>, Postgraduate IAIN Parepare<sup>4</sup>  
E-mail: [rusdayabasri@iainpare.ac.id](mailto:rusdayabasri@iainpare.ac.id)

**Abstract.** A lawsuit for annulment of marriage accompanied by a demand for the return of dowry is a very rare matter. The simulation of this case led to several differences of opinion such as decision number: 372/Pdt.G/2019/PA. Pare. The element of annulment of marriage is the existence of forced marriage, the plaintiff asks for the entire dowry. The purpose of this study is to examine and analyze 1) Review of dowry returns in marriage annulment cases at the Parepare Religious Court number 372/Pdt.G/2019/PA. Pare. 2) The judge's interpretive approach in granting the demand for dowry return for the annulment of the marriage filed in the Parepare Religious Court. This type of research is field research that is descriptive qualitative. The approach used is a juridical-normative approach and a sociological approach. The results showed that: 1) The review of the return of dowry in the annulment of marriage refers to the rule of article 149 letter c of the Compilation of Islamic Law that the dowry must be repaid in the event of termination of marriage relations, if the state of *qabla dukhul*, then the dowry can be returned in half after the decision of annulment of marriage is granted, although the panel of judges argues that by raising a different side the analogy of dowry is returned in its entirety because the wife does not approve the marriage, 2) the judge's interpretive approach in deciding the case of returning the dowry in the annulment of marriage using socio-historical methods that the annulled marriage aborts the dowry obligation, and the identity of the husband and wife who were previously held back to being traces and virgins as a result of the marriage being annulled.

**Keywords:** dowry return, marriage annulment, judge's consideration.

## 1. INTRODUCTION

The existence of the marriage bond includes the inherent rights of the wife, as an effort to raise the status and dignity of women. It is in recognition of everything that is the duty of the husband to the wife as in marriage that the first right established by Islam is the right of a woman to obtain dowry. (Ahmad 2001). Dowry is the main object in a marriage contract even though dowry is not included in the marriage pillars. (Muhammad'Azzam, Hawwas, and Khon 2011). Dowry or dowry is defined as a compulsory gift of money or goods from the bridegroom to the bride when a marriage contract is held. (Basri 2019)

Dowry actually has an important value in marriage and as a mandatory gift in a marriage contract, as Allah SWT says. in Q.S. Al-Nisa/4:4:

وَأَتُوا النِّسَاءَ صَدُقَتِهِنَّ نِحْلَةً فَإِنْ طِبَّنَ لَكُمْ عَنْ شَيْءٍ مِّنْهُ نَفْسًا فَكُلُوهُ هَنِيئًا مَّرِيًّا

"Give dowry to the woman (whom you marry) as a willing gift. Then, if they give you some of it gladly, accept it and enjoy the gift gladly."

Dowry as one of the rights of women in marriage is not regulated in Law Number 1 of 1974 concerning Marriage, but the Compilation of Islamic Law regulates dowry in great detail in Chapter

V Articles 30 to Article 38 of the KHI concerning dowry. The legal basis for dowry is only found in the Compilation of Islamic Law (KHI), (Syarifuddin 2011) However, there is no rule on the return of dowry in cases of marriage annulment.

Annulment of marriage or *Fasakh* in Sayyid Sabiq's view it is a way to cancel and untie the bond between husband and wife. (Basri 2020). The term marriage annulment is currently categorized in the definition of a valid marriage, but there are criteria for the occurrence of marriage annulment, namely: first, procedural violations of marriage, second, violations of marital material. The first example, for example, non-fulfillment of the conditions of marriage guardians, non-attendance of witnesses and other procedural reasons. Second, as exemplified by marriages that take place under threat, there is a misconception about the prospective husband and wife.(Nuruddin and Tarigan 2019).

This study is limited to the definition of marriage annulment in the corridor of an action to obtain a court decision stating that marriage does not meet the requirements of the KHI provisions is declared void, especially on the issue of claims for the return of dowry in addition to lawsuits that juridically do not have clear rules.

The return of dowry, especially in divorce cases, is in the view of Slamet Abidin that the husband can be released from his obligation to pay the dowry in full if the divorce before intercourse comes from the wife, for example the wife leaves Islam, or benefits because the husband is poor or disabled, or because the woman after adulthood refuses to be married to the husband chosen by her guardian. For such a wife, the right to severance pay falls because she has refused before her husband receives anything from her. (Slamet and Aminuddin 1999).

Decision with case number 372/Pdt.G/2019/PA. Pare (Fadly 2022) It was found that Amar was a judgment granting the return of dowry to the plaintiff in its entirety. The consideration raised by the panel of judges with the discovery of the fact that this case meets the requirements for the annulment of marriage, namely marriage that was carried out by force.

The second consideration states that the return of the dowry in its entirety can be granted on the grounds that the annulment of marriage cannot refer to the divorce rules. The partial or partial dowry return only applies to divorce lawsuit cases, not marriage annulment. Settlement of the demand for the return of dowry is granted in addition to spending money, because spending money cannot be proven in a formal juridical manner.

Some studies on the annulment of marriage include the annulment of a marriage begins after the decision of the Court has permanent legal force and is valid from the time of the marriage. That the annulment of marriage has a fixed legal force, separation is different from a husband and wife who are separated because of talaq, but the obligation of iddah still applies to women whose marriage is annulled, while the provision of income has a different provision, namely, not getting a living from her ex-husband, because marriage with a facid contract does not require bread. (Labetubun and Fataruba 2020) Furthermore, research that discusses there are several legal consequences of marriage annulment, namely: Children Those born into annulled marriages are not retroactive, and thus these children are considered legitimate, even if one or both parents have bad faith. Regarding the problem of property, the husband and wife have the full right to take legal action on each other's property in the form of grants, gifts, alms or others.(Patampari 2020)

Meanwhile, the case that occurred at the Sidoarjo Religious Court was the annulment of marriage Number: 1175 / Pdt.G / 2014 / PA. on the grounds that the marriage does not meet the requirements of marriage, the falsification of the identity of the prospective bride, the lack of administrative complexity of the prospective husband and wife and the lack of public understanding of the provisions of the Marriage Law and the Compilation of Islamic Law. (Judge 2019). The case occurred at the Sekayu Religious Court Number 012/Pdt.G/2016/PA. Sky. annulment of marriage on the grounds that the husband as the Petitioner felt cheated over the wife's virgin status as the Respondent and the status of the child born. The Applicant asked to do a DNA test to prove the child, but the Respondent refused to do a DNA test but the Respondent admitted himself that before marrying the Applicant, the Respondent had had intercourse with another man, therefore the Applicant who found his wife's condition was so certain that a suspicious reaction arose and ended in conflict, in the end the Applicant took the initiative to stop his household by applying for annulment marriage.(Brata 2019).

The next research is the annulment of marriage in the Compilation of Islamic Law on the grounds of polygamy without permission. That the basis and background of the framers of the Compilation of Islamic Law in determining the validity of the annulment of marriage to polygamy without the permission of the Religious Court is to create certainty of law and public order for the

common good, especially the protection of women as aggrieved parties to the existence of illegal polygamy. As for the literature of the Shafi'i school, there is no authority to annul marriages due to illegal polygamy.(Holik 2013).

Based on the survey of the literature above and the search for studies related to the issue of annulment of dowry returns on marriage annulment, there has been no research with the same study as this research study. This is because this research is local casuistic. Often there are claims for the return of dowry in divorce cases, but the return of dowry in marriage annulment claims is still an additional action.

This study aims to examine the marriage annulment case filed at the Parepare Religious Court, namely case number 372 / Pdt.G / 2019 / PA. Pare, this relates to the reasons submitted for the annulment of marriage in accordance with Article 71 of the KHI paragraph f namely the annulment of marriage filed on the grounds that the marriage was carried out by force, the plaintiff felt aggrieved by the occurrence of the marriage. The demand for the return of dowry as a result of the marriage annulment lawsuit was filed.

Based on the background as described in the paragraph above, the formulation of the problem proposed in this study is: 1) How to examine the return of dowry in the case of marriage annulment in the Parepare Religious Court, number 372 / Pdt.G / 2019 / PA. Pare? 2) What is the judge's interpretive approach in granting the demand for dowry return for the annulment of marriage filed at the Parepare Religious Court?

## 2. RESEARCH METHODS

This type of research is *field research that* is descriptive qualitative. This method is intended to provide as much detail as possible about the review of dowry return in marriage annulment cases at the Parepare Religious Court, and the judge's interpretive approach in granting demands for dowry return for marriage annulment filed at the Parepare Religious Court. The approaches used are: Juridical -normative approach and sociological approach.

The source of data from this study is obtained from primary and secondary data. Primary data, namely empirical data obtained directly from judges at the Parepare Religious Court who handle dowry slaughter claims in marriage annulment cases and several other judges as comparison sources.

While secondary data, namely supporting data sourced from documents/archives and library data. This research is qualitative, so the data collection method carried out in this study is an in-depth interview (*in depth interview*) and using content analysis methods (*Content Analysis*). (Bisri 2004).

## 3. RESULTS AND DISCUSSION

### 3.1 Review of the Return of Dowry in the Annulment of Marriage in Case Number: 372/Pdt.G/2019/PA. Pare.

The Parepare Religious Court has absolute competence to decide cases of annulment of marriage and return of dowry. So that the simulation between the two authorities can be submitted jointly with the aim of accelerating the resolution of cases and finding a decision that accommodates the two disputes. Hartini responded to the return of dowry and annulment of marriage by explaining that:

"Dowry should be distinguished from panaiik. As long as the wife has not given herself to her husband, the dowry is returned. If the husband is incapacitated, then this is not considered to be returned the dowry. However, if the wife does not want to give herself up, the dowry can be considered for return. For cases of marriage annulment whose elements such as coercion, disability, feeling deceived by the occurrence of marriages such as other proposed marriages, the analogy is unlikely to occur in the sense that it is impossible to have been more than 6 (six) months just known. The rules of more than 6 (six) months are only known about the elements of coercion, disability, misconception, fraud can actually be complained as long as the ratio of reasons proposed is very basic such as after marriage the husband goes sailing and returns after 6 (six) months or a year, then this can be considered."

Another opinion was put forward by Ilyas about the return of dowry and the annulment of marriage explaining that:

"The essence of returning dowry is whether or not there has been a conjugal relationship, if it does not mean that there is something called returned in half and not intact and the term *dowry misl*, if it is related what else can be returned. If reasoned, what should be restored while the relationship has taken place and the meaning of one-sided marriage has been fulfilled. Meanwhile, the annulment of marriage must be differentiated because it relates to the filing grace period of 6 months, if the problem of being deceived such as marrying a virgin turns out to be a widow, it is limited to a period of 6 months. Unless the annulment of marriage related to the mahram relationship can be filed at any time.

This is done as learning so that things that are principled and have been regulated by applicable norms must be implemented. It could be that when the matter has passed 6 months ago it is very likely that there are other motives behind the submission. Already doing a new relationship, proposing for example because of the element of force is illogical in my opinion."

Mihdar in defining the meaning of marriage annulment explained in terms of the historicity of the birth of the marriage annulment case, namely:

"Marriage annulment, especially in Indonesia, the classical fiqh concept does not recognize the term marriage annulment, what exists is the prevention of marriage, but we are regulated by legal rules that base so that damage afterwards does not occur the term *sad al zara'i*, so the concept of marriage annulment was born. The second consideration is the issue of fate, we do not know for example the children of the first wife and the second wife can carry out marriage without knowing the origin then it becomes dangerous for the couple, although there are solutions due to the marriage including the problem of children still being borne by their parents, but neglect of this will only backfire on the next generation, especially for the couple who have already married. Those are the madharats that are caused so that there must be a concept called the annulment of marriage. The opinion of returning the dowry in its entirety after the annulment of the marriage is granted is returned to the willingness of the wife because in fact the dowry is the prerogative of the wife."

Responding to issues related to the return of dowry in the marriage annulment case, Ruslan argued that:

"Dowry cannot be returned when the context is *ba'da dukhul*. The marriage can be blamed but dowry is a tribute to the wife and it should be understood that dowry is not a common property."

The return of dowry juridically explains exactly what category is called dowry and does not include *panai' money* as part of the dowry as local culture and surrounding traditions assume. The annulment of marriage is defined by the breakdown of marriage with elements or reasons mentioned in articles 70 and 71 of the Compilation of Islamic law, so that the marriage must be terminated as a legal affirmation for marital violations.

With regard to the decision that returns the dowry in full, there are 2 (two) different views. In the first view, the panel of judges based on the consideration that the proof of forced marriage comes from the wife's side, so that the husband materially suffers losses so that he deserves to get back the dowry that has been given. The socio-psychological review used by the panel of judges states that an annulled marriage means that the marriage never took place even though the marriage was juridically valid, but the return of dowry cannot be relied on the divorce rule which only returns half because the divorce rule with the annulment of marriage has a different clause.

The second opinion states that the rule of returning dowry on annulment of marriage with divorce can be used using the theory of *qiyas*, namely *illat* or similarity clauses in both domains lies in the legal consequences of termination of marital relations. So that the decision by returning half the dowry meets the juridical considerations that have been outlined.

### 3.2 The judge's interpretation in granting the demand for the return of dowry for the annulment of marriage was filed at the Parepare Religious Court.

The process of extracting facts in decision 372/Pdt.G/2019/PA. Pare that the panel of Judges found that the condition of the marriage of Plaintiff II with Defendant II was carried out not on the basis of mutual knowledge and liking but the will of Plaintiff II's parents with the parents of Defendant II without seeking the consent and willingness of Defendant II.

The fact of the subsequent trial is that despite the absence of consent and willingness from Defendant II, the marriage was still carried out so that Defendant II only followed the will of Defendant I starting the procession of the fiancée, the proposal until the marriage contract was carried out by force from Defendant II even though Defendant II had communicated through WhatApp with Plaintiff II the marriage was still carried out.

The conclusion of the panel of judges considered that by the execution of the marriage of Defendant II under circumstances forced or forced by Defendant I, the Plaintiffs' claim has been proven and legally grounded to annul the marriage of Plaintiff II with Defendant II based on the provisions of Article 71 letter (f) of the Compilation of Islamic Law.

The panel of judges considered that because the case *of a quo* annulment of marriage with demands for the return of *panaik* money and all kinds of in-kind goods returned to the Plaintiffs, the consequences of the return referred to by the Plaintiffs were not regulated in the Marriage Law Number 1 of 1974 jo Compilation of Islamic Law, while what was meant by partial or partial return of dowry was in the case of a divorce lawsuit not annulment of marriage.

A different opinion was expressed by Padhlilah Mus who stated that:

"The consideration in the case of the return of dowry in the case of marriage annulment, first refers to the consideration of the KHI which only returns half. The second consideration is to look at the sociological factors surrounding the filing of the case such as how to restore the initial status of married couples to unmarried and include in consideration local cultural factors."<sup>1</sup>

Ilyas affirmed in resolving the dowry return case in the marriage annulment case by arguing that:

"There is no way to return the dowry in full with the rules of the Compilation of Islamic Law which states that *qabla dukhul* alone only returns half so that if *qabla dukhul* only returns half then *ba'da dukhul* is no longer there. The point is that half of the dowry returned already meets the formal juridical element.

On the judge's consideration in case 372/Pdt.G/2019/PA. Pare seems to me to be logical that at the time of the proposal there will be things agreed upon including dowry, if it is returned in full and considers the marriage void with it presumed never to have happened then *the panaik money* and other natural objects agreed for the marriage must be returned all if indeed the marriage is considered to have never existed or occurred. While the Compilation of Islamic Law does not regulate the return of *panaik* and objects other than dowry."<sup>2</sup>

Responding to the decision of the case that returned the dowry completely, for Ilyas disagreed because he did not find the right juridical basis to return it completely. There is an element of coercion in the case, although it is included in the category of marriage annulment, but the reason is not specific and has a major influence on the marriage and can be corrected. Unlike the case with mahram relationships, the opportunity to return the dowry can be done.

Based on the views of some of the informants above, the judge's interpretive approach used in resolving cases of returning dowry on annulment of marriage starts from the criteria of *qabla dukhul*. The legal considerations taken still refer to the positive rule of law and some views of

---

<sup>1</sup> Padhlilah Mus, Judge of Parepare Religious Court *The interview*, conducted on October 27, 2021.

<sup>2</sup>Ilyas, *Interview*, conducted on October 27, 2021.

scholars. The consideration of returning half or all of it rests on the judge's interpretation in concluding the case.

The occurrence of separation between husband and wife is not only on the issue of divorce but with the existence of new events in current conditions can also be applied to the annulment of marriage which is also understood as the event of separation of husband and wife, because the Qur'anic postulate about the return of dowry applies to all types of separation in the household. In the context of classical fiqh, this uses the rule of *qiyas* which takes the same *illat* similarity, namely the termination of marriage relations.

Juridically normatively, Article 149 letter c of the Compilation of Islamic Law contextually states "a husband who is mentally his wife *Qabla Al Dukhul* must pay half the dowry specified in the marriage contract". (Editor 2012) Norm *Fasakh* It has the same meaning in divorce so that juridically normative rules also apply to the return of half dowry.

There are two views on the *qabla dukhul* aspect in terms of return, namely returning in half or in full. This has partially led to a double interpretation of the meaning of dowry return. Therefore, the return of dowry is defined according to the conditions under which the case is filed, if the matter underlying the demand for dowry to be returned is principled and related to the pillars and conditions of marriage then the dowry can be returned in full. When the return of dowry is related to coercion, disability, misconception, then the dowry can be returned in half.

In the clause *ba'da dukhul* there are also various opinions about the ability to return. The first opinion that allows full return by requiring the willingness of the wife, the second opinion that does not provide a way to return the dowry based on the purpose of marriage, one of which is that sexual intercourse has been fulfilled, then the dowry cannot be submitted for return.

The case of the return of dowry preceded by the application for annulment of marriage, before considering whether the dowry can be returned or not, then the proof begins from extracting the elements that cause the annulment of marriage. Judges classify by involving several aspects as follows:

1. The existence of a clause on the cause of annulment of marriage.
2. Application deadline.

As for the factors involved in formulating the consideration of dowry return, you should consider, among others:

1. Factor in the real state of the couple.
2. The factor of fairness for the parties.
3. Factors of humanitarian considerations.
4. The involvement of traditional customs ('urf) as well as the philosophy of returning dowry.

Case decision number: 372/Pdt.G/2019/PA. Pare should only return the dowry in half on the grounds that:

1. The filing of a lawsuit by the husband's family even though the source of the problem comes from the wife's side.
2. The consideration of the return of dowry does not question the willingness of the wife.
3. The judge's interpretive approach to the articles and verses on the return of dowry on the annulment of marriage is partial and generalizes the case.

The judge's consideration has actually referred to article 149 letter c of the KHI which states to pay off the dowry that is still owed in whole and half if *qabla dukhul*. In review of the ruling, the judge had actually cited the statutory article on the return of dowry, but the judge considered the other side of the return of dowry itself, such as material losses suffered by the husband due to non-fulfillment of the basic purpose of marriage. The judge considered that the husband was very worthy to get back the dowry that had been given, as an effect of restoring the husband's identity to a person who was considered never married before.

The theory of legal considerations used takes into account the invalidity of marriage so that everything related to the context of marriage is considered non-existent including dowry, so it deserves to be fully restored. The aspect of trial facts that have sufficient evidence shows that the judge's approach to consideration in deciding this case tends to be dominated by sociological and psychological aspects and the involvement of tradition as a bridge to solving cases.

The change in law is seen in the application of legal considerations by judges, ignoring textual rules on the concept of fiqh and laws and regulations and only based on the track record of trial facts that indicate that the wife no longer wants the marriage. Saving property from misuse as the will of the theory of benefit is also used by judges so that its application according to the author is not appropriate.

The legal view of the panel of judges, should use the qiyas theory, namely the similarity of illat between divorce and marriage annulment is the dissolution of marital relations, so that the return of half dowry also applies to cases of marriage annulment. The return of dowry as a whole must go through an in-depth study between prioritizing the interests of the husband or the interests of the wife. Legal determination using the qiyas method also needs caution in its application, at least judges before considering using the method involve experts in the field of fiqh proposal studies.

The theory of benefit implies a harmony between positive legal rules and the fulfillment of benefits for the parties. The return of the dowry in half with the concept of dowry *has* reflected the fulfillment of the fulfillment of benefits for both parties. The return of dowry in full, considering that the marriage that has already taken place is considered to have never existed, will only eliminate the definition of benefit for the litigant. The party who must return the dowry in full does not benefit from a major event in his life and the potential for making mistakes to repeat in the future can occur with the understanding that dowry is not something sacred and can be transferred freely.

In the end, the judge when deciding the case, especially in the case of returning dowry in the annulment of marriage, at least carries the observance of the application of formal legal rules, which is then added by exploring several supporting aspects such as:

1. Premarital and postmarital social circumstances.
2. The use of the possibility of ijthad qiyas as a means of law creation in accordance with the previous law.
3. The involvement of tradition as data supports the birth of consideration. Tradition, although not codified, has a spirit of law enforcement that applies to the community adherents.
4. Extracting the right jurisprudence to apply to the matter examined.
5. The concept of progressive benefit that can provide justice solutions for litigants.

#### 4. Conclusion

Based on the previous explanation, it is concluded as follows, namely the return of dowry refers to the rules of article 149 letter c of the Compilation of Islamic Law and Surah Al-Baqarah verse 237 which initially the rule was used for divorce but through ijthad qiyas can also be applied to cases of annulment of marriage that demand the return of dowry, the results of the formulation with the method of ijthad qiyas mandated to return half of the amount of dowry. The aspect of returning dowry also pays attention to the classification of marriage annulment, namely the fulfillment of the qabla *dukhul element*. If it is *dukhul*, there is no legal rule governing the matter, so that the return of dowry cannot be submitted unless it gets the consent and willingness of the owner of the dowry, namely the wife.

The judge's interpretive approach in case 372/Pdt.G/2019/PA. Pare who decided to return the dowry in its entirety used a legal change approach that contextually contradicted the will of articles 30 to 34 of the KHI, articles 149 letter c and Surah Al-Baqarah verse 237 and translated the hadith about partial return of dowry. The panel of judges stated that the interpretation of marriage that meets the element of marriage annulment makes all components of marriage including dowry in the marriage considered never existed, so that the dowry proposed at the time of marriage is not dowry so it must be returned to the original owner.

#### Reference

1. Ahmad, Saebani Beni. 2001. "Fiqh Munakahat II." *Bandung: Pustaka Setia*.
2. Basri, Rusdaya. 2019. "Fiqh Munakahat: 4 Mahzab Dan Kebijakan Pemerintah."
3. ———. 2020. "Fikih Munakahat 2."
4. Bisri, Cik Hasan. 2004. "Pilar-Pilar Penelitian Hukum Islam Dan Pranata

Sosial.”

5. Brata, Gusti Gema Mahardika. 2019. “Analisis Pertimbangan Hakim Dalam Memutus Perkara Pembatalan Perkawinan.” *Notarius* 12(1): 433–51.
6. Fadly, Ahmad. 2022. “Telaah Kritis Atas Putusan Nomor: 372/Pdt. G/2019/PA. Pare Tentang Pengembalian Mahar Dalam Pembatalan Perkawinan Di Pengadilan Agama Parepare.”
7. Hakim, Ahmad Fauzan. 2019. “Pembatalan Perkawinan Karena Penipuan Identitas.” *Dinamika: Jurnal Ilmiah Ilmu Hukum* 25(2).
8. Holik, Abd. 2013. “Pembatalan Perkawinan Akibat Poligami.” *Tafáqquh: Jurnal Penelitian Dan Kajian Keislaman* 1(2): 58–72.
9. Labetubun, Muchtar Anshary Hamid, and Sabri Fataruba. 2020. “Implikasi Hukum Putusan Pengadilan Terhadap Pembatalan Perkawinan.” *Batulis Civil Law Review* 1(1): 54–59.
10. Muhammad’Azzam, ’Abd al-’Aziz, ’Abd al-Wahhab al-Sayyid Hawwas, and H Abdul Majid Khon. 2011. *Fiqh Munakahat: Khitbah, Nikah Dan Talak*. Amzah.
11. Nuruddin, Amiur, and Azhari Akmal Tarigan. 2019. *Hukum Perdata Islam Di Indonesia: Studi Kritis Perkembangan Hukum Islam Dari Fikih, Undang-Undang Nomor 1 Tahun 1974 Sampai Kompilasi Hukum Islam*. Kencana.
12. Patampari, Ahmad Supandi. 2020. “Konsekuensi Hukum Pembatalan Perkawinan Menurut Hukum Islam.” *AL-SYAKHSHIYYAH Jurnal Hukum Keluarga Islam dan Kemanusiaan* 2(2): 86–98.
13. Redaksi, Tim. 2012. “Kompilasi Hukum Islam.” *Nuansa Aulia*.
14. Slamet, Abidin, and H Aminuddin. 1999. “Fiqh Munakahat 1.” *Bandung: CV Pustaka Setia*.
15. Syarifuddin, Amir. 2011. “Hukum Perkawinan Islam Di Indonesia: Antara Fiqh Munakahat Dan Undang-Undang Perkawinan.”