

The Position of Married Daughters in Adoption in the Ngada Tribe Indigenous Community (Study of Supreme Court Decision Number 407 K/Pdt/2019)

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Abstract

This research examines the position of married daughters in child adoption practices within the Ngada ethnic community through an analysis of Supreme Court Decision Number 407 K/Pdt/2019. Using normative legal research methods and a case approach, the study reveals that although the Ngada community adheres to a patrilineal system that traditionally prioritizes sons in child adoption, there exists an adaptive mechanism in the form of the concept "women can hold the machete" that enables the adoption of married daughters for the purpose of performing traditional rituals. The Supreme Court in its decision acknowledged this flexibility of customary law by rejecting the argument that adoption applies only to male children, while affirming that the practice of adopting married daughters does not contradict Ngada customary law as long as it is done to continue and perform traditional rituals. This research demonstrates that customary law is not a static system but rather dynamic and continuously evolving according to community needs, and highlights the important role of courts in harmonizing traditional values with principles of justice and equality within the context of legal pluralism in Indonesia.

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1. INTRODUCTION

Indonesia has an incredibly diverse cultural wealth, reflected in the customary legal systems that apply in various regions. The customary law system is a living law (*living law*) in society, growing and developing along with the dynamics of the life of society itself. The existence of customary law has been recognized in the Indonesian national legal system based on Article 18B paragraph (2) of the 1945 Constitution which states that the state recognizes and respects customary law community units and their traditional rights as long as they are still alive and in accordance with the development of society. This recognition shows the state's commitment to maintaining legal pluralism, especially in the field of family and inheritance law which is still strongly influenced by local customs.

One important aspect of customary law is the regulation of child adoption. The practice of child adoption has long been known in various customary communities in Indonesia with various purposes, procedures, and different legal consequences. In general, child adoption in customary law has the purpose of continuing the lineage, maintaining the continuity of wealth, continuing customary traditions, and maintaining kinship relations. However, there

is significant variation in adoption practices in various regions based on the kinship system adopted, whether patrilineal, matrilineal, or parental.

In societies that adhere to a patrilineal system such as Batak, Nias, Bali, and some communities in East Nusa Tenggara including the Ngada tribe, lineage is drawn from the male side. Consequently, adoption usually prioritizes male children because they are considered to be able to continue the lineage and carry on customary responsibilities. In a patrilineal system, the position of women is often limited in the context of adoption, especially if the woman is married because according to custom, she has entered her husband's family and is no longer part of her original family.

The Ngada tribe that inhabits the Ngada Regency area on Flores Island, East Nusa Tenggara, is one of the tribes that adheres to the patrilineal kinship system. In Ngada customs, there is a concept of "*Fluffy*" or kinship groups based on male lineage that play an important role in social structures and the implementation of traditional rituals. Adoption in Ngada society is known as "*Two Logo Gas Heaters*" which has its own procedures and requirements based on local customary law.

The practice of adoption in indigenous communities often raises legal issues, especially when it comes into contact with the national legal system or when there is a dispute between family members. One interesting issue to study is the position of married girls in adoption in indigenous communities that adhere to a patrilineal system such as the Ngada tribe. This issue is complex because it involves the intersection of gender status, marital status, and the prevailing customary kinship system.

Supreme Court Decision Number 407 K/Pdt/2019 provides a real picture of the dynamics and complexity of the adoption of married daughters in the context of the Ngada indigenous community. This case began with a lawsuit by David Wale Sedu alias Alo Wale against Maria Rofina Foa alias Mia Ngola Dhou and her husband Frederikus Ongo Lewa alias Feri Bei regarding the validity of the adoption of Maria Rofina Foa as an adopted child in the Gebu Bae Bele tribe group in Tiwu Village, Seso Village, Soa District, Ngada Regency. David Wale Sedu considered the adoption invalid because Maria Rofina Foa was a married woman with four children, while according to the plaintiff, the Ngada custom which adheres to a patrilineal system only recognizes the adoption of male children.

This case illustrates the conflict between the plaintiffs' more conservative interpretation of customary law and a more adaptive view of social change. The Bajawa District Court initially granted part of the plaintiffs' claim and declared the adoption null and void. However, this decision was overturned by the Kupang High Court, which rejected the plaintiffs' claim in its entirety on the grounds that adoption of female children under Ngada customary law is not prohibited as long as it fulfills the purpose of continuing and carrying out customary rituals. The Supreme Court then rejected the plaintiffs' appeal, thus upholding the Kupang High Court's decision.

This Supreme Court ruling provides an important lesson about the dynamics of customary law in dealing with social developments. Although the Ngada community traditionally adheres to a patrilineal system that tends to prioritize sons, in practice there is flexibility where women can be "maleified" (given the status of men) for the purpose of carrying out customary rituals. The concept of "women can hold machetes" shows the existence of an adaptation mechanism in customary law to adjust to the changing needs of society.

Studying this decision is important to enrich the understanding of Indonesian customary law, especially regarding the position of women in the adoption system. Amidst the development of the concept of gender equality and recognition of women's rights, it is

interesting to examine how customary law negotiates with modern values. In addition, this decision also illustrates the role of the court in interpreting and applying customary law within the framework of the national legal system, which shows the complexity of legal pluralism in Indonesia.

Based on this background, this study will examine in depth the position of married daughters in adoption in the Ngada tribal community by analyzing the Supreme Court Decision Number 407 K/Pdt/2019 and its implications for the development of customary law in Indonesia. This study is expected to provide theoretical and practical contributions in efforts to understand the dynamics of Indonesian customary law and its harmonization with the national legal system and universal values of equality and justice.

2. METHOD

This research uses a normative legal research method with a case approach (*case approach*) which focuses on the analysis of the Supreme Court Decision Number 407 K/Pdt/2019 concerning the case of adoption of married daughters in the Ngada tribal community. Data collection was carried out through literature studies by analyzing primary legal materials in the form of laws and court decisions, secondary legal materials in the form of books, scientific journals, and research results related to customary law and adoption, and tertiary legal materials such as legal dictionaries and encyclopedias. Data analysis was carried out qualitatively with descriptive-analytical and interpretive techniques to understand the position of married daughters in the adoption system in the Ngada tribal community, as well as to identify patterns of legal reasoning used by judges in deciding the case by considering the socio-legal context and legal pluralism in Indonesia.

3. RESEARCH RESULTS AND DISCUSSION

1. The Concept of Adoption in Indonesian Customary Law

Adoption in the context of Indonesian customary law is a practice that has been carried out for generations with very diverse backgrounds, reflecting the plurality of Nusantara culture. This practice does not merely have a legal meaning as a transfer of responsibility for child care, but is laden with complex social, spiritual, and economic dimensions. In traditional societies, adoption is often the answer to the need to continue the lineage, especially for families who do not have children. Interestingly, this motivation is not only related to biological aspects, but also spiritual ones because in many traditional traditions, the presence of children is believed to be the successor to the lineage who will carry out traditional rituals and social obligations towards ancestors.

Terminologically, the term adoption has various names in various indigenous communities in Indonesia, each of which reflects the uniqueness of its concept and meaning. In Javanese society there is a term known as "*lift a child*" or "*baby doll*", in Bali it is called "*looking forward*", in Batak it is known as "*eat son*", In South Sulawesi, the Bugis-Makassar people are familiar with the concept of "*pattola child*", Meanwhile in East Nusa Tenggara, including the Ngada tribe, the term "*Two Logo Gas Heaters*". The diversity of these terms shows that adoption has been integrated into the social and cultural systems of each society with its own unique characteristics.

The purpose of adoption in Indonesian customary law also varies greatly. In addition to continuing the lineage, adoption can be intended to strengthen kinship ties between the adoptive family and the biological family, ensure the care of orphans, raise the social status of children from underprivileged families, or even as a strategy to

maintain wealth so that it remains within the family environment. In some customary communities, there is a belief that by adopting a child, a couple who have not been blessed with children will then obtain a biological child, which shows the existence of a religio-magical dimension in the practice of adoption.

The procedure for adoption in customary law shows a variety of variations that reflect the richness of Indonesian culture. In Javanese society, adoption can be done simply through an agreement between biological parents and adoptive parents, often accompanied by a *selamatan* ceremony as a form of announcement to the community. In Bali, the adoption process is much more formal and ceremonial, involving complex traditional ceremonies with the presence of religious leaders, village officials, and relatives from both sides. Indigenous communities in East Nusa Tenggara, such as the Ngada tribe, have a special ritual for adopting a child which involves traditional leaders and traditional symbols that symbolize the child's status change.

The legal consequences of adoption in customary law are greatly influenced by the kinship system adopted by each community. In patrilineal systems such as in Batak, Bali, and some communities in East Nusa Tenggara, adoption of a child (especially a boy) results in the child becoming a full member of the adopted family by severing ties with his biological family. Adopted children have the same legal status as biological children, including in terms of inheritance and the implementation of customary obligations. In contrast to the patrilineal system, in matrilineal societies such as the Minangkabau, adoption does not completely sever ties with the biological family, but adds new kinship ties. Meanwhile, in bilateral or parental societies such as Java, adoption generally does not sever ties with the birth family, and adopted children can have inheritance ties with both families under certain conditions.

Modern developments have brought significant changes in the practice of adoption in indigenous communities. The influence of modernization, urbanization, education, and changes in social structure have shifted the motivation for adoption from being predominantly motivated by continuing the lineage to being more oriented towards the welfare of the child. In addition, the adoption procedure which was originally purely based on customary law is now often followed by a formal procedure through a court ruling to obtain legal certainty. Harmonization between customary law and national law is a challenge in itself, considering that modern laws and regulations such as the Child Protection Law and PP Number 54 of 2007 concerning the Implementation of Child Adoption emphasize the principle of the best interests of the child as the main consideration, which sometimes differs from traditional motivations in customary law.

Despite facing various changes and challenges, adoption in the context of customary law still exists and is relevant in contemporary Indonesian society. Court decisions, including the Supreme Court, often accommodate and respect the diversity of customary adoption practices, as seen in various jurisprudence. This reflects Indonesia's commitment to legal pluralism and respect for the traditional rights of indigenous peoples as mandated by the constitution. Recognition of adoption based on local customs is also explicitly stated in Government Regulation Number 54 of 2007, which shows the state's efforts to harmonize customary practices with the national legal framework.

2. The Position of Girls in the Child Adoption System in Customary Law Communities that Adhere to the Patrilineal System

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Customary law communities that adhere to the patrilineal system are communities that trace their lineage from the father or male side. This system is adopted by several ethnic groups in Indonesia such as the Batak, Nias, Bali, Gayo, some communities in Lampung, and several ethnic groups in East Nusa Tenggara including the Ngada tribe. In the patrilineal system, men have a very important position because they are considered the successors of the lineage, guardians of the family line, implementers of traditional rituals, and heirs of inheritance. The consequence of this system is a strong preference for boys in various aspects of social life, including in the context of adoption. Boys are seen as the successors of the lineage who will maintain and carry out traditional traditions, and pass on the family name to the next generation.

The position of girls in the patrilineal system is relatively less advantageous compared to boys. Girls are often considered "*will go*" from her family after marriage because she will enter her husband's family. In the context of Batak society, for example, a girl is called "*pipe*" who will later leave her family to become part of her husband's family. In Bali, a daughter who marries will follow her husband's family and will no longer be part of her family of origin according to tradition. This concept is known as "*left the castle*" which means leaving the palace or home of origin. This understanding has significant implications for the position of girls in adoption in patrilineal societies.

In the adoption system in patrilineal societies, there is a strong preference for adopting boys rather than girls. This is based on the idea that the main purpose of adoption is to continue the lineage and carry out customary obligations which in the patrilineal system are generally imposed on men. In Bali, for example, adoption or "*looking forward*" is done to a boy because he will be responsible for carrying out religious ceremonies for the ancestors and continuing the family name. Likewise in Batak society, adoption or "*eat son*" prioritize boys because they will continue the clan and carry out customary obligations.

Although there is a preference for sons, in practice the adoption of daughters still occurs in patrilineal societies with various adjustments and modifications. One interesting adaptation is the concept of "*sentana rajeg*" in Bali, where girls are given the status of men for the purpose of continuing the lineage. Through a special customary procession, the girl gains legal status equal to that of a boy and can continue her father's lineage. When married, the husband of the girl "*sentana rajeg*" will enter his wife's family and their children will follow the lineage from the mother's side (who has been given the status of male by custom). A similar concept is also known in Ngada society with the term "women can hold machetes", which indicates that in certain situations, women can be given a position to carry out traditional rituals that are usually carried out by men.

Adoption of daughters in patrilineal societies can also occur with other motivations beyond the interests of continuing the lineage. For example, adoption can be done to strengthen kinship ties between two families, as a form of solidarity with underprivileged families, or for reasons of affection for the child in question. In this context, adoption of daughters is not always aimed at providing a position as the main heir or executor of customary rituals, but rather more on care and maintenance. Consequently, the legal status of the adopted daughter may be different from that of the adopted son, especially in terms of inheritance and the implementation of customary obligations.

In relation to inheritance rights, the position of adopted daughters in patrilineal societies is generally more limited compared to adopted sons. In Bali, for example, adopted daughters who do not have the status of "*sentana rajeg*" usually has no right to family inheritance, although he may receive special gift property (*soul of funds*) from his adoptive parents. In Batak society, adopted daughters generally do not have the right to customary land or inheritance, but can receive gifts in the form of movable property (*out passamos*). However, practice in the field shows that there is variation and flexibility according to family conditions and agreements.

Modern developments have brought significant changes to the position of girls in patrilineal societies, including in the context of adoption. The influence of gender equality values, education, urbanization, and interaction with national legal systems have driven a shift in views on the position of girls. In some cases, courts have recognized the rights of adopted girls that were previously limited by patrilineal customary law, especially in terms of inheritance. Court decisions, including the Supreme Court, often consider the principles of justice and gender equality when deciding cases related to adoption and inheritance in the context of customary law.

The main challenge in understanding the position of girls in the adoption system in patrilineal societies is the diversity of customary law practices and interpretations in various regions. Even within the same ethnic group, there are variations in the application of customary law depending on local social, economic, and cultural conditions. In addition, the interaction of customary law with national law and universal values such as human rights and gender equality has encouraged modifications and adaptations in adoption practices. This shows that customary law is not a static entity, but rather a dynamic system that continues to develop according to the needs of society.

The marital status of daughters adds complexity to the adoption system in patrilineal societies. Married daughters are generally considered to have become part of their husband's family and are no longer fully members of their original family. In this context, the adoption of married daughters is not common in traditional patrilineal societies. However, as seen in the case of the Ngada community, this practice can occur with certain adjustments, especially when related to the interests of carrying out customary rituals. This case shows the flexibility of customary law to adapt to specific situations, while also reflecting the complexity of the relationship between gender status, marriage, and customary law in the context of diverse Indonesian society.

3. Legal Considerations of Judges in Supreme Court Decision Number 407 K/Pdt/2019 Regarding the Adoption of Married Daughters in the Ngada Tribe Indigenous Community

Supreme Court Decision Number 407 K/Pdt/2019 is an important decision that provides an overview of how the highest court in Indonesia considers the case of adoption of a married daughter in the context of the Ngada Tribe's indigenous community which adheres to a patrilineal system. This case began with a lawsuit filed by David Wale Sedu alias Alo Wale against Maria Rofina Foa alias Mia Ngola Dhou and her husband Frederikus Ongo Lewa alias Feri Bei regarding the validity of Maria's adoption as an adopted child in the Gebu Bae Bele tribe group in Tiwu Village, Seso Village, Soa District, Ngada Regency. This lawsuit was based on the argument that the adoption was invalid because Maria was a married woman with four children, while according to the patrilineal Ngada tradition, adoption should ideally be carried out on a male child.

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The main issue in this case is the validity of the adoption or "*Two Logo Gas Heaters*" committed by Paulina Mau Gili (deceased) against Maria Rofina Foa on February 5, 2014 in Sa'o Fao Zeru, Tiwu Village, Seso Village, Soa District. The plaintiff (David Wale Sedu) argued that the appointment was contrary to Ngada customary law for several reasons: first, the appointment was not through deliberation and consensus with the heirs in the Gebu Bae Bele sub-tribe group; second, Maria Rofina Foa is a descendant of Moli Wale who had "*broken up bought*" (married according to custom) by Meo Bai so that she no longer has a relationship with Gebu Bae Bele; third, Maria Rofina Foa is a woman even though the patrilineal system prioritizes male children for adoption; fourth, Maria Rofina Foa has been bought by her husband and is part of her husband's family in the village of Mude; and fifth, the adoption of a child should be carried out by a married couple, while Paulina Mau Gili is a widow.

The Bajawa District Court in its decision Number 10/Pdt.G/2017/PN Bjw dated February 20, 2018 granted part of the plaintiff's lawsuit and stated that the adoption of a child carried out by Paulina Mau Gili against Maria Rofina Foa was an act against the law and customary norms, so it was null and void. However, the decision was overturned by the Kupang High Court through decision Number 55/PDT/2018/PT KPG dated August 8, 2018 which rejected the plaintiff's lawsuit in its entirety. The High Court is of the opinion that the adoption of a daughter in Ngada customary law is not prohibited as long as it fulfills the purpose of continuing and carrying out customary rituals.

In its legal considerations, the Supreme Court rejected the cassation application filed by the plaintiff (David Wale Sedu) and upheld the decision of the Kupang High Court. The main consideration that is interesting in this decision is that the Supreme Court recognized the flexibility in Ngada customary law regarding the adoption of female children. The Supreme Court stated: "That the Plaintiff's argument that according to customary law, adoption of children only applies to male children is not absolutely valid, the adoption of female children in customary law is not prohibited by customary law in order to continue and carry out customary rituals in the Fao Zeru traditional house owned by Paulina Mau Gili because according to custom, women can be made male (women can hold machetes), and can be done without the need for approval from the residents concerned."

This consideration is very significant because it acknowledges the existence of an adaptation mechanism in Ngada customary law that allows women to be given a special position in the context of customary rituals. The concept of "women can be made men" or "women can hold machetes" shows that in certain situations, especially when there are no boys who can perform customary rituals, women can be given a position to carry out these functions. This shows that customary law is not a rigid and unchangeable system, but rather a system that has an adaptation mechanism to accommodate the needs of society.

The Supreme Court also did not question Maria Rofina Foa's status as a married woman with four children. This indicates that in the Supreme Court's view, marital status does not automatically eliminate a person's eligibility to be adopted as a child in a particular customary context. In the Ngada customary community, adoption is more emphasized on the aspect of carrying out customary rituals than on the aspect of inheritance or continuation of biological lineage. Thus, Maria Rofina Foa can be adopted as a child by Paulina Mau Gili for the purpose of carrying out customary rituals

in the Fao Zeru customary house, even though she is married and part of her husband's family.

The plaintiff's argument that adoption must be carried out through consensus with the heirs in the Gebu Bae Bele tribal group was also not accepted by the Supreme Court. This shows that the Supreme Court recognizes individual autonomy in decision-making regarding adoption in certain customary contexts. In its considerations, the Supreme Court stated that adoption "can be carried out without the need for approval from the residents concerned", indicating that approval from all members of the customary group is not always an absolute requirement in the adoption process.

This Supreme Court decision also reflects a more contextual approach to understanding and applying customary law. The Supreme Court is not trapped in a rigid and textual interpretation of customary law, but rather considers the local social and cultural context and practices that live in society. This approach is in line with the principle of "*living law*" where customary law is understood as a living system that continues to develop according to the needs of society, not as a static and unchangeable system.

The significance of this decision also lies in the Supreme Court's recognition of legal pluralism in Indonesia. The Supreme Court respects the diversity of adoption practices in various indigenous communities, while recognizing the flexibility and adaptability of indigenous law in dealing with social change. This is in line with the mandate of the constitution which recognizes and respects the unity of indigenous legal communities and their traditional rights as stated in Article 18B paragraph (2) of the 1945 Constitution.

From a gender equality perspective, this ruling makes a positive contribution to efforts to recognize the position and role of women in the customary legal system. By recognizing the concept of "women can be made into men" or "women can hold machetes", the Supreme Court indirectly strengthens the position of women in patrilineal customary societies. This recognition shows that women can have significant roles and positions in the implementation of customary rituals and the sustainability of traditions, even in a system that traditionally tends to prioritize men.

In the context of the development of customary law in Indonesia, this decision provides an important precedent for how courts can harmonize traditional values with modern values such as equality and justice. The Supreme Court did not dogmatically reject the practice of adopting married daughters on the grounds that it contradicts the patrilineal system, but rather acknowledged the existence of adaptation mechanisms in customary law that allow for such practices in certain contexts. This approach shows that customary law and modern values are not always in conflict, but can complement and adapt to each other.

From the analysis of the judge's legal considerations in the Supreme Court Decision Number 407 K/Pdt/2019, it can be concluded that the highest court in Indonesia recognizes the flexibility and adaptability of customary law in the context of the adoption of married daughters in the Ngada tribal community. This decision makes an important contribution to the development of jurisprudence related to customary law in Indonesia, especially in terms of recognizing the position and role of women in the patrilineal customary law system. Through this decision, the Supreme Court has confirmed the principle that customary law is not a rigid and static system, but rather a system that is alive and continues to develop according to the needs and dynamics of society.

4. CLOSURE

Based on the discussion of the concept of adoption in Indonesian customary law, the position of girls in the adoption system in patrilineal societies, and the analysis of legal considerations in Supreme Court Decision Number 407 K/Pdt/2019, it can be concluded that the practice of adoption in Indonesian customary societies reflects the richness and diversity of culture that continues to adapt to changing times. Although in the traditional patrilineal system the position of girls is relatively less advantaged compared to boys, indigenous communities have developed adaptation mechanisms such as the concept of "women can be made men" or "women can hold machetes" as recognized in the Supreme Court decision. This decision emphasizes that customary law is not a rigid system but a living and dynamic system, which is able to accommodate social change and modern values such as gender equality without having to abandon the essence of tradition, while also demonstrating the commitment of Indonesian judicial institutions to harmonizing legal pluralism with the principles of justice and legal certainty in the context of a modern state that respects cultural diversity.

5. BIBLIOGRAPHY

Book

- Hadikusuma, Hilman. *Hukum Kekerabatan Adat*. Jakarta: Fajar Agung, 1993.
- Irianto, Sulistyowati. *Pluralisme Hukum dalam Perspektif Global*. Jakarta: Yayasan Obor Indonesia, 2014.
- Muhammad, Bushar. *Pokok-Pokok Hukum Adat*. Jakarta: Pradnya Paramita, 2013.
- Soekanto, Soerjono. *Hukum Adat Indonesia*. Jakarta: Raja Grafindo Persada, 2012.
- Soepomo. *Bab-Bab Tentang Hukum Adat*. Jakarta: Pradnya Paramita, 2003.
- Wignjodipuro, Surojo. *Pengantar dan Asas-Asas Hukum Adat*. Bandung: Alumni, 2010.

Scientific Journal

- Amir, Muhammad. "Praktik Pengangkatan Anak dalam Masyarakat Bugis-Makassar." *Jurnal Antropologi Indonesia*, Vol. 25, No. 1, 2018.
- Ariani, I Gusti Ayu Agung. "Diskriminasi Gender dalam Pewarisan Harta pada Anak Angkat di Bali." *Jurnal Kesetaraan dan Hukum Adat*, Vol. 5, No. 2, 2019.
- Budiman, Arief. "Analisis Komparatif Status Anak Angkat dalam Berbagai Sistem Kekerabatan." *Jurnal Penelitian Hukum*, Vol. 8, No. 2, 2020.
- Budiono, Abdul Rachmad. "Dimensi Sosio-Kultural dalam Praktik Pengangkatan Anak di Indonesia." *Jurnal Hukum dan Masyarakat*, Vol. 14, No. 2, 2019.
- Darmodiharjo, Darji. "Nilai-Nilai Kultural dalam Sistem Adopsi pada Masyarakat Jawa." *Jurnal Kebudayaan Jawa*, Vol. 12, No. 3, 2015.
- Dyatmikawati, Putu. "Preferensi Gender dalam Praktik Adopsi pada Masyarakat Patrilineal Indonesia." *Jurnal Hukum Adat dan Modernisasi*, Vol. 10, No. 2, 2020.
- Lon, Yohanes Servatius. "Ritual Adopsi Anak dalam Masyarakat Adat Flores." *Jurnal Etnografi Indonesia*, Vol. 5, No. 2, 2020.
- Neonbasu, Gregorius. "Ritual dan Simbolisme dalam Praktik Adopsi Anak di Flores." *Jurnal Studi Budaya Nusantara*, Vol. 4, No. 1, 2020.
- Pinatih, Tiurma. "Status dan Kedudukan Perempuan dalam Sistem Kekerabatan Batak." *Jurnal Gender dan Hukum*, Vol. 7, No. 2, 2018.
- Simarmata, Rikardo. "Pluralisme Hukum dan Isu-Isu yang Menyertainya." *Jurnal Hukum & Pembangunan*, Vol. 47, No. 1, 2017.

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- Situmorang, Martha. "Praktik Pemberian Harta pada Anak Perempuan dalam Masyarakat Batak." *Jurnal Studi Etnis Batak*, Vol. 3, No. 2, 2020.
- Sudantra, I Ketut. "Makna Ritual dalam Proses Pengangkatan Anak Menurut Hukum Adat Bali." *Jurnal Magister Hukum Udayana*, Vol. 7, No. 4, 2018.
- Sudaryanto. "Upacara Adat dalam Pengangkatan Anak pada Masyarakat Jawa Tengah." *Jurnal Kebudayaan dan Tradisi*, Vol. 9, No. 3, 2017.
- Sukerti, Ni Nyoman. "Sentana Rajeg: Adaptasi Gender dalam Hukum Waris Adat Bali." *Jurnal Perempuan dan Hukum*, Vol. 6, No. 1, 2021.
- Sukaryati, Ni Made. "Pergeseran Kedudukan Perempuan Bali dalam Praktik Adat Perkawinan." *Jurnal Studi Gender dan Anak*, Vol. 4, No. 3, 2019.
- Tule, Philipus. "Kekerabatan dan Struktur Kekuasaan dalam Komunitas Adat Ngada." *Jurnal Antropologi Indonesia*, Vol. 30, No. 2, 2019.
- Warman, Kurnia. "Adopsi Anak dalam Tradisi Matrilineal Minangkabau." *Jurnal Hukum dan Masyarakat Adat*, Vol. 6, No. 3, 2018.
- Widiastuti, Rini. "Pola Pewarisan pada Anak Angkat dalam Masyarakat Adat Jawa." *Jurnal Hukum Keluarga*, Vol. 5, No. 1, 2019.
- Windia, Wayan. "Konsep Adopsi dalam Hukum Adat Bali." *Jurnal Hukum Adat*, Vol. 8, No. 2, 2016.