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# **Analysis of the Revocation of the Lawsuit for Unlawful Acts Before the Defendant's Answer to the Determination Study Number 203/Pdt. G/2022/Pn Plk at the Palangka Raya District Court**

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**Abstract:** In the Indonesian civil law system, the plaintiff's ability to withdraw a lawsuit before the defendant responds is a key procedural aspect regulated by Article 271 of the Reglement op de Burgerlijke Rechtsvordering (Rv). This analysis explores the application of this rule in Determination Number 203/PDT.G/2022/PN PLK at the Palangka Raya District Court, where the plaintiff, Porwanto, withdrew a lawsuit for unlawful acts against three defendants before their response. The court approved the withdrawal, ordered the plaintiff to pay court costs of Rp2,160,000, and removed the case from the register. This case reflects the balance between plaintiff autonomy and judicial efficiency, yet it raises concerns about potential procedural abuse. This study underscores the need for strict oversight to ensure such flexibility does not compromise fairness for all parties involved.

**Keyword:** Unlawful Acts, Withdrawal of Lawsuit, Civil Procedure.

## **INTRODUCTION**

In the Indonesian legal system, there is the term the ability of the plaintiff to withdraw his or her lawsuit, which is often known as "revocation of the lawsuit," this is a key feature in civil procedures regulated by the Reglement op de Burgerlijke Rechtsvordering (Rv) (Devi, 2023). Devi explained that this old regulation from the colonial era is still the main guide in handling lawsuits in the current courts. Hasmin et al. explained that in the lawsuit withdrawal procedure, we could see Article 271 Rv, which explicitly gives the plaintiff the right to withdraw his lawsuit before the defendant provides an answer, and this can be done without requiring the approval of the defendant or permission from the court (Hasmin et al., 2024).

This rule shows how much control the plaintiffs have over their legal actions. However, it raises questions about the fairness and efficiency of using the courts, especially when a lawsuit is withdrawn very early. This principle has been affirmed in various judicial decisions, such as the Supreme Court's decision in Case Number 1841 K/Pdt/1984 (Wijaya, 2020), emphasizing the plaintiff's absolute right to withdraw the lawsuit before the defendant's reply.

Thus, the withdrawal of the lawsuit reflects the parties' autonomy in the legal process, as well as inviting reflection on its impact on the dynamics of the judiciary.

According to Article 271 Rv, such revocation can be carried out unilaterally without the need for approval from the defendant or the court. This differs from revocation after the defendant gives an answer, which requires the defendant's consent based on Article 272 Rv (Wahyuni & Dhana, 2021). The reason behind this difference is to prevent plaintiffs from abusing the legal system by filing and withdrawing lawsuits repeatedly, which can upset the defendant or burden the courts.

The right to withdraw the lawsuit early can be a blessing and a boomerang. On the one hand, it allows the plaintiff to improve their steps or re-evaluate the legal plan without getting stuck in a lengthy and inefficient process. There is also a risk that this right is used for dishonest purposes, such as avoiding adverse judgments or forcing the defendant to negotiate out of court. Thus, understanding how these rules are applied is an important step in assessing the balance between flexibility and integrity of the judicial process.

Palangka Raya District Court, which stands in Palangka Raya City, Province of Central Kalimantan. The court is the primary venue for resolving a wide range of legal disputes in its territory, ranging from business conflicts to family matters, reflecting the diverse legal needs of the local community (Hayati et al., 2024).

In handling civil cases, this court refers to the rules in the RV, including those related to the revocation of the lawsuit. One of the interesting cases to look at is the Determination of Number 203/PDT. G/2022/PN PLK, which is related to lawsuits for unlawful acts. This type of lawsuit is an important part of Indonesian civil law, providing an avenue for the plaintiff to seek compensation for wrongful acts committed by the defendant, whether due to negligence or willfulness. However, proving a lawsuit like this is often tricky, as the plaintiff must clearly show the relationship between the defendant's actions and the losses suffered. When this kind of lawsuit is withdrawn before the defendant answers, as happened in this case, we wonder what prompted the decision and how it affected the parties involved.

In the determination of Number 203/PDT. G/2022/PN PLK, the plaintiff initially filed a lawsuit against the defendant, alleging unlawful acts, but withdrew it before the defendant responded. The determination issued by the Palangka Raya District Court records this decision and explains the administrative steps taken to close the case. Although this document does not address whether the allegations in the lawsuit are justified, it provides an overview of how courts handle the revocation of a lawsuit at an early stage. Unfortunately, we do not get detailed information about the precise nature of the t in question. However, this remains a clear example of how Article 271 RV works in real situations. By studying this determination, we can take a closer look at the role of the courts in ensuring that the revocation process runs smoothly and according to the rules while also considering what may happen behind the scenes that are not written in official documents.

This analysis aims to delve deeper into how the revocation of lawsuits is regulated and applied in Indonesian civil law, with Determination Number 203/PDT. G/2022/PN PLK as the focal point. By looking at how Article 271 Rv is used in this case, we want to understand how the law balances the plaintiff's freedom to control his lawsuit and the need to keep the judicial process orderly and fair. The author will also examine whether the right to withdraw this lawsuit can be used strategically or even abused and what it means for the legal system, especially in unlawful acts. This study will examine the impact on how people access justice and resolve issues outside of court.

## **METHOD**

This normative legal research aims to examine in depth the regulation and application of the right to revoke lawsuits in the Indonesian civil procedure law system (Nugraha, 2024). The primary focus of this study is on the provisions in the Reglement op de Burgerlijke

Rechtsvordering (Rv), especially Article 271 and Article 272, as well as how these norms are applied in judicial practice through a study of the Determination of the Palangka Raya District Court Number 203/PDT. G/2022/PN PLK.

Thus, this research is not only descriptive of the applicable legal norms but also prescriptive and analytical, namely by evaluating the effectiveness of these norms and assessing their impact on the principles of justice, the efficiency of the judicial process, and the potential for abuse of rights by the parties. This study uses several approaches. The legislative approach analyzes the content and meaning of the provisions of Articles 271 and 272 of the RV and other relevant legal instruments.

Furthermore, a case approach is applied to examine how these provisions are practiced in the case of Determination Number 203/PDT. G/2022/PN PLK. In addition, a conceptual approach is used to discuss theoretically the concept of the plaintiff's right to the revocation of the lawsuit and its relevance in a legal system that upholds the principle of procedural justice.

This study's source of legal materials consists of primary, secondary, and tertiary legal materials. Primary legal materials include applicable regulations such as Rv, Supreme Court decision Number 1841 K/Pdt/1984, and Determination Number 203/PDT. G/2022/PN PLK as the main object of the research. Secondary legal materials include legal literature, textbooks, and scientific articles. The main object of this study is the Determination of Number 203/PDT. G/2022/PN PLK issued by the Palangka Raya District Court reflects the application of Article 271 Rv in the context of unlawful acts.

The research location is administratively within the jurisdiction of the Palangka Raya District Court. However, all studies are conducted in a literature manner without direct involvement in collecting field data. Through this approach, this research is expected to provide a complete picture of how the right to revoke lawsuits is regulated, practiced, and responded to by the judicial system, as well as the extent to which these rights are in line with the principles of justice in the settlement of civil disputes.

## **RESULTS AND DISCUSSION**

### **The Concept of Unlawful Acts Lawsuit in Indonesian Civil Law**

The concept of an Unlawful Acts (PMH) lawsuit in Indonesian civil law is one of the important bases in the settlement of civil disputes, giving the aggrieved party the right to claim compensation. The primary legal basis of PMH is Article 1365 of the Civil Code (KUHPercivil), which states that every unlawful act that causes harm to others obliges the perpetrator to compensate for the loss (Waluyo, 2022).

In this context, a PMH lawsuit is a legal means that can be used to demand civil liability for losses incurred from an act that violates legal norms, both written and unwritten. The elements in the PMH lawsuit, as determined in Article 1365 of the Civil Code, include four important components: (1) the existence of unlawful acts, (2) the existence of elements of fault from the perpetrator, either intentionally or due to negligence, (3) the victim experiences real loss, and (4) there is a causal relationship between the act and the loss that occurred (Rahman, 2024). The plaintiff must prove these four elements in the judicial process. If one of these elements is not met, the judge can reject the lawsuit because it does not meet the juridical requirements.

Unlawful Acts are not only limited to violations of the law but also include actions contrary to the subjective rights of others, decency, and propriety according to the norms of society living in practice.

Rosa Agustina emphasizes this in her book, which explains that an act can be categorized as PMH if it violates legal obligations, the rights of others, public decency, and the principle of prudence (Vadia et al., 2024). In the context of PMH, compensation can be in three primary forms: nominal, compensation, and penalty (F. E. Putri, 2015). Nominal damages are awarded to show that a violation of the law has occurred even though there is no real loss. Compensatory

damages are the most common form, aiming to compensate for real losses, both material and immaterial, suffered by victims. Meanwhile, punitive damages are punitive in extreme cases as a form of retaliation or deterrent against the perpetrator, especially if the offense is committed with malicious intent or is highly detrimental.

### **Legal Provisions on the Withdrawal of Lawsuits in Civil Proceedings.**

In civil procedure law, the revocation of the lawsuit is the right of the plaintiff to terminate the civil process that he has submitted to the court. This revocation can be done at any time, before or after the examination process begins, but with different legal provisions (Said, 2022). If the revocation is made before the defendant submits his answer, the plaintiff can withdraw his lawsuit unilaterally without requiring the defendant's consent.

Article 271 of the Reglement of de Rechtsvordering (Rv) regulates this provision, which states that revocation can be carried out freely as long as the investigation has not been substantially commenced. If the lawsuit has entered the examination stage, where the defendant has submitted his answer, the revocation can only be made if the defendant agrees. This aims to protect the rights and interests of the defendant from being harmed by the unilateral actions of the plaintiff. In this case, the plaintiff must apply for revocation in the trial, and the judges will ask the defendant for his consent. If the defendant disagrees, the lawsuit must continue and cannot be withdrawn unilaterally.

Interestingly, the revocation of the lawsuit does not only apply to all defendants but can also be done to one of the defendants only in cases involving several defendants. The revocation of one of the defendants still requires the defendant's approval if the examination process is already underway. This is affirmed in the jurisprudence of the Supreme Court, such as Decision Number 1742 K/Pdt/1983, which rejected the revocation because it did not receive the approval of the defendant concerned.

This jurisprudence emphasizes that the principle of contradiction in civil cases must be respected. The party authorized to revoke the lawsuit is the plaintiff or a legal representative who is explicitly authorized in an extraordinary power of attorney to withdraw the lawsuit. This refers to the provisions of Article 272 Rv and Article 123 of the HIR, which stipulate that a power of attorney must explicitly state the legal action to be taken by the legal representative, in this case, the revocation of the lawsuit.

In addition, the revocation procedure must also be formally carried out at the trial, where the revocation, the defendant's consent, and the panel's decision will be officially recorded in the minutes of the hearing. Speaking of costs, the revocation of the lawsuit does not relieve the plaintiff from the obligation to pay the case costs. In fact, according to the provisions of Article 272 Rv, the cost of the case remains the plaintiff's responsibility as a consequence of withdrawing the lawsuit before the verdict. If the amount of fees the plaintiff has paid is insufficient, the court will issue a determination to collect the deficiency.

### **Judicial Practices related to Lawsuit Revocation Before Answer.**

Withdrawal of a lawsuit in Indonesian judicial practice is possible, although it is not explicitly regulated in the *Herzeine Inlandsch Reglement* (HIR) or the *Reglement Buiten Govesten* (RBg). The legal basis for revoking the lawsuit comes from the *Reglement op de Rechtsvordering* (Rv), specifically Article 271 and Article 272 (Asikin & Zainuddin, 2023). Based on the provisions of Article 271 Rv, the plaintiff has the absolute right to withdraw his lawsuit before the defendant submits an answer without requiring the defendant's consent. This allows the plaintiff to reconsider his lawsuit before the case enters the answer-and-answer stage, which is procedurally considered the beginning of proving the dispute in court.

Technically, the lawsuit is revoked before the answer by submitting an official letter to the Chief Justice of the District Court. In the letter, the plaintiff expressed his desire to withdraw the case, and this process did not require a hearing or the defendant's presence. The Chief Justice

then completed the judicial administration to record the revocation. Because there has been no answer from the defendant, this process is considered not to have entered the stage of examining the subject matter.

Therefore, there is no violation of the principle of due process or the defendant's right to defend himself. The main principle in withdrawing the lawsuit before the answer is that the plaintiff retains complete control of the initiative of filing the case. If he feels that the lawsuit filed is no longer relevant, erroneous, or unprepared, then revocation is a legal and legal remedy. In this context, the plaintiff cannot be forced to continue the case, especially when there has been no official response from the defendant.

However, the responsibility for the costs of the case remains on the shoulders of the plaintiff as a form of accountability for the legal action that he has submitted to the court. The legal consequences of withdrawing the lawsuit before the answer is considered final. This means that after the case is revoked, the legal relationship between the parties returns to its original state as if there has never been a dispute submitted to the court. The Panel of Judges will determine the revocation, and the case will be removed from the case register. Even if this revocation closes the case, the plaintiff can still file a new lawsuit with the same subject matter if there are sufficient legal reasons, considering that the revocation is not equivalent to a judgment that has permanent legal force (*inkracht van gewijsde*). In judicial practice, withdrawing a lawsuit before an answer is often an efficient way to resolve disputes without going through a lengthy process and high costs. It also reflects the flexibility of Indonesia's civil procedure law, allowing room for voluntary resolution before conflicts become more complex.

### **Application of the Provisions of Article 271 Rv in the Determination of the Court in Affirming the Principles of Indonesian Civil Procedure Law.**

Based on the analysis of Determination Number 203/PDT. G/2022/PN PLK, it was obtained that the Plaintiff, Porwanto, filed a lawsuit for unlawful acts against three parties: Defendant I (PT. Astra Sedaya Finance Palangkaraya Branch), Defendant II (Astra Credit Companies Palangkaraya Branch) and Defendant III (Rusdi). The lawsuit was registered on November 17, 2022, with registration number 203/PDT. G/2022/PN PLK. However, before the defendant responded, the Plaintiff, through his legal representative, Fachri Ahyani, S.H., submitted a written request to revoke the lawsuit on February 14, 2023. The Panel of Judges of the Palangka Raya District Court granted the application on February 21, 2023, based on Article 271 Rv. The determination results showed that the lawsuit was revoked at the initial stage of the judicial process before the defendant submitted an answer so that the plaintiff had the right to withdraw his lawsuit unilaterally. This determination also notes that the Plaintiff was sentenced to pay a case fee of Rp2,160,000.00, which includes stamp duty, redaction, process, PNBP, and summons costs. This decision was strengthened by an order to the Court Clerk to remove the case from the case book register, signaling the end of the legal process on this case. These results provide concrete evidence of applying the lawsuit withdrawal procedure in judicial practice.

Article 271 Rv stipulates that the plaintiff can withdraw his lawsuit unilaterally as long as the defendant has not provided an answer to the lawsuit. In the case of Determination Number 203/PDT. G/2022/PN PLK follows Swantoro's explanation, which states that the Panel of Judges considered this provision and stated that the application for revocation was submitted at the right time, namely before the defendant submitted a response (Swantoro, 2017). This decision reflects the application of the law consistent with the principles of Indonesian civil procedure law, which is the legal basis in the nation's life and gives the plaintiff the freedom to control his lawsuit at an early stage. This flexibility allows the plaintiff to reevaluate its legal strategy or resolve disputes out of court without involving a longer judicial process.

However, the determination does not explicitly mention the reason for the lawsuit's withdrawal by the Plaintiff, which is an aspect of ambiguity; there are several possibilities that



can be assumed based on general practice. One of them is the existence of a peaceful settlement between the Plaintiff and the Defendant out of court, which is often the primary motivation for withdrawing the lawsuit at an early stage (A. I. Putri, 2023). Other alternatives can be strategic considerations, such as a low chance of winning after further evaluation or economic pressures related to the cost of the case. The withdrawal of lawsuits at an early stage, as happened in this case, has a positive impact on the efficiency of the judicial system. By ending the case before entering the more intensive trial stage, the Plaintiff helps reduce the court's workload, allowing the judge to focus on other cases that need resolution (Hoffman & Mahoney, 2001). In the Palangka Raya District Court, removing cases from the case book register shows that court resources can be allocated more effectively. This efficiency must be balanced with oversight to ensure that revocations are not leveraged for unauthorized purposes, such as avoiding adverse judgments or delaying legal obligations.

For defendants, withdrawing the lawsuit before providing an answer can provide relief because they avoid the time-consuming and costly judicial process. In these cases, Defendants I, II, and III did not need to draft responses or attend follow-up hearings, which reduced their legal and financial burden. According to the author, this revocation also leaves uncertainty, as the underlying dispute may not be fully resolved. Wanti wants the defendant's place of action to remain vigilant against the possibility of the plaintiff filing a similar lawsuit if the out-of-court settlement is not legally binding. This determination also affirms the application of Article 273 Rv, which requires the plaintiff to pay the case fee when withdrawing his lawsuit. In this case, the Plaintiff was ordered to pay Rp2,160,000.00, including various fees such as stamps and summonses. This provision aims to prevent abuse of the judicial system, where a plaintiff may file a lawsuit only to pressure the defendant and then revoke it without consequence. With this burden of costs, the civil procedure law creates a checks and balances mechanism that ensures that a lawsuit is dismissed with serious consideration, not for speculative or manipulative purposes.

The Palangka Raya District Court demonstrated its commitment to legal procedure by ensuring that the lawsuit's withdrawal met the conditions outlined in Article 271 Rv. The Panel of Judges granted the application but also documented the process in detail, including legal considerations and orders to strike out the case. This transparency is critical to maintain public trust in the judiciary's integrity. The court also plays an active role in balancing the plaintiff's right to withdraw the lawsuit with the defendant's interests, which is reflected in the judgment of the plaintiff's costs.

The revocation of the lawsuit in Determination Number 203/PDT. G/2022/PN PLK shows that the Indonesian legal system provides room for flexibility in dispute resolution but also has mechanisms to prevent abuse (Onggianto & Soemartono, 2024). Justice for the parties can be achieved if the revocation is based on legitimate reasons, such as a peaceful settlement, and not to avoid legal liability. In this case, the court's decision to grant the revocation while charging the plaintiff costs reflects an effort to maintain a balance between the rights and obligations of the parties while ensuring that the judicial process continues to proceed with integrity and under statutory procedures. This case confirms that withdrawing the lawsuit before the defendant's answer is legitimate and supports judicial efficiency, but strict oversight is required to ensure justice. Determination of Number 203/PDT. G/2022/PN PLK is proof that Indonesia's civil procedure law, especially Articles 271 and 273 Rv, has been appropriately implemented by the Palangka Raya District Court.

## CONCLUSION

Analysis of the Determination of Number 203/PDT. G/2022/PN PLK shows that the withdrawal of an unlawful action lawsuit before the defendant's answer, as stipulated in Article 271 Rv, is a procedure that provides flexibility to the plaintiff to terminate the case unilaterally while supporting judicial efficiency by reducing the court's workload. In this case, the Plaintiff,

Porwanto, withdrew his lawsuit against PT. Astra Sedaya Finance, Astra Credit Companies, and Rusdi at the initial stage, which the Palangka Raya District Court later granted with a penalty of Rp2,160,000.00, reflects the application of Article 273 Rv to prevent abuse of legal process.

While these revocations allow for out-of-court dispute resolution and save judicial resources, the unclear reasons for revocation create potential uncertainty for defendants, who remain at risk of facing similar lawsuits in the future. This determination strikes a balance between the autonomy of the plaintiff and the integrity of the judicial process but also underscores the need for oversight to ensure that the right to revoke is not necessarily abused for strategic or manipulative purposes at a later date

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