

# **Philosophy of Justice In The Shadow of Plurality A Feminist Interpretation of Legal Inequality Towards Women**

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## **ABSTRACT**

This article explores the critical relationship between justice, feminist jurisprudence, and legal pluralism in the context of Indonesia's multilayered legal system. While classical legal philosophy particularly Aristotelian thought has long conceptualized justice in terms of distributive and corrective fairness, such frameworks often fall short in addressing systemic gender inequality. In societies marked by legal pluralism, including Indonesia, women remain structurally marginalized within state law, customary law, and religious law. This study examines how feminist jurisprudence provides an alternative lens for reinterpreting justice by centering the lived experiences of women and exposing patriarchal power structures embedded in legal institutions. Feminist jurisprudence challenges the presumed neutrality of law, revealing its complications in reinforcing male dominance and silencing women's voices. In the plural legal landscape of Indonesia, patriarchal norms are often preserved through the state's accommodation of discriminatory practices under the guidance of respecting cultural traditions or religious autonomy. Customary inheritance laws, the positioning of women in marriage, and religious family law disproportionately disadvantage women. Despite formal legal reforms such as the enactment of the Domestic Violence Law and the Sexual Violence Law, implementation remains hindered by institutional gender bias and cultural resistance. By integrating feminist legal theory into the discourse on justice, this paper advocates a shift from formal equality to substantive, transformative justice. Legal pluralism, rather than being a neutral space of cultural expression, must be critically interrogated to prevent the legitimization of systemic gender oppression. Ultimately, the article argues that feminist jurisprudence offers both a theoretical and practical pathway for reconstructing inclusive legal systems that uphold the rights and dignity of women in pluralistic societies.

**Keywords:** Feminist Jurisprudence, Pluralism, Justice Philosophy, Gender Equality

## **1. INTRODUCTION**

The issue of justice in a legally and culturally plural society is a field of debate that concerns not only the relationship between the state and its citizens, but also between law and justice itself. In a complex and pluralistic social reality, law is no longer present as a single, neutral system, but rather as a network of interacting norms including state law, customary law, and religious law. When various legal systems coexist, often referred to as legal pluralism, fundamental questions arise regarding the purpose of creating such justice. One of the groups most vulnerable to injustice in this configuration of legal plurality is women. In many societies, whether in the context of national law, customary law, or religious law, women are often placed as secondary legal subjects. The law is not only masculine in its formal construction, but also often fails to



substantively represent women's experiences, needs, and identities. (Heri Setiawan, 2018) This is where feminist jurisprudence emerges as a critical approach in the philosophy of law that offers a new reading of the concepts of justice, law, and power relations in society.

*Feminist Jurisprudence* born from the womb of disappointment with the traditional legal system that was built and operated through a patriarchal perspective. Feminist criticism of law starts from the view that law is not gender neutral, but is shaped by social norms that prioritize male experience and interests as universal standards. (Magdalena, 2017) Throughout the legal history of many countries, women have been systematically excluded from basic rights, such as the right to own property, the right to control their own bodies, the right to vote in politics, and the right to protection from violence. For example, in the 19th and early 20th centuries, women did not even have the right to own property independently of their husbands, were not recognized as full owners of their own bodies, and did not have equal access to education and employment with men. (Layer, 2012) In a pluralistic legal system, this gender inequality is increasingly complex. State laws that should guarantee formal justice often compromise or even submit to customary or religious legal systems that normatively place women in subordinate structures. (Natalis, 2020) In the Indonesian context, for example, many customary law practices still treat women unequally, especially in aspects of inheritance, marriage, and social roles. Religious law is also not immune from this criticism, where patriarchal interpretations of sacred texts reinforce unequal gender relations, and are often legitimized by the state in the name of pluralism or respect for local traditions.

*Feminist Jurisprudence* then becomes an important analytical tool to dismantle the structures of injustice hidden behind claims of legality and plurality. (Muhammad Yahdi Urfan and Cintya Nurika Irma, 2023) Since the 1970s, many feminist legal theorists such as Catharine MacKinnon, Carol Smart, and Martha Fineman have raised the issue that the law is not only substantively biased, but also exclusive of women's experiences. MacKinnon, for example, equates sexism with classism and highlights how male dominance is reflected in legal doctrine and practice, both in the public and private spheres. Law, she argues, is not only a reflection of the social order, but also a tool for legitimizing existing power structures, including male power over women. Ann Scales in her article "Towards a Feminist Jurisprudence" also asserts that the legal order has been formed and operated within a patriarchal framework. Law is not neutral, and justice is not universal if it does not consider the specific experiences of women. Thus, justice must be interpreted contextually and intersectionally. This reflects the spirit of feminist jurisprudence which



demands not only formal equality, but also the dismantling of legal structures that systematically perpetuate inequality.

Within Feminist Jurisprudence there are several theoretical approaches that show a spectrum of criticism of the law. (Azizah, 2021) First, the liberal equality model emphasizes achieving equal rights through law and public policy, by demanding that women be treated equally with men. This approach was widely used in the first wave feminist movement that fought for women's voting rights, work rights, and access to education. Second, the sexual difference model emphasizes that the law must take into account the biological and social differences between men and women so as not to create hidden discrimination in the name of formal equality. Third, the dominance model starts from the criticism that gender relations are not just about differences, but the systemic domination of men over women, which is institutionalized in law. Fourth, the postmodern or anti-essentialist model rejects the existence of a single definition of women, and emphasizes the plurality of overlapping identities and experiences such as race, class, and sexual orientation.

These four approaches offer different lenses for reading gender justice in a plural society. Within the framework of the philosophy of justice, the feminist approach encourages a shift from distributive and procedural justice to transformative and reflective justice. The concept of justice is not only about the distribution of resources or equal treatment before the law, but also about the recognition, representation, and deconstruction of biased legal norms. Legal plurality in a multicultural society demands special sensitivity to substantive justice for vulnerable groups, including women. In reality, a plural legal system that is not guarded by the principles of feminist justice can easily perpetuate discrimination in the name of local wisdom, religious freedom, or cultural autonomy. (Natalis, 2020) Without a critical mechanism to assess whether a customary or religious norm contains gender bias, legal pluralism can become a tool for perpetuating legitimate oppression.

The concept of justice in a plural society can no longer be understood in a singular and universal manner as understood in the classical legal philosophy tradition. Although philosophers such as Aristotle have provided an important basis for thinking about justice as a moral virtue and distinguishing between distributive and corrective justice, this approach has proven insufficient to answer the question of justice in the context of structural and intersectional gender inequality. (Santoso, 2014) When law is practiced in a legally pluralistic society like Indonesia, where state law coexists with customary and religious law, reality shows that the existing legal system can



actually be an instrument for perpetuating injustice against vulnerable groups, especially women. Feminist jurisprudence is present as a critical and reflective approach to this inequality. This approach rejects the assumption that law is neutral, and instead shows that law is a reflection of power relations formed by a patriarchal social system. By highlighting the experiences of women as autonomous legal subjects with diverse backgrounds (race, class, religion, sexual orientation), feminist jurisprudence demands a reinterpretation of justice from mere formal equality to transformative substantive justice. In this framework, justice is understood as an effort to dismantle discriminatory structures in law and create a legal system that truly represents all groups in society. (Ali, 2010)

Therefore, it is important to place the philosophy of justice in a critical relationship with legal plurality and gender inequality. This journal aims to show that the concept of justice that has been constructed abstractly in classical legal philosophy must be re-examined through a more contextual feminist approach. In the shadow of plurality, justice must be understood not only as a formal distribution of rights and obligations, but as an effort to dismantle the patriarchal structure embedded in the legal and social system. The feminist approach offers a down-to-earth interpretation of justice: not neutral, not universal, but rooted in the real experiences of women who have been marginalized. Based on the background description above, the formulation of the problem used is as follows: How can the concept of justice in legal philosophy be criticized and reinterpreted through a feminist jurisprudence approach in the context of a legally plural society? And to what extent does legal pluralism—including state, customary, and religious law contribute to the perpetuation of gender inequality in the protection of women's rights in Indonesia?

## **2. RESEARCH METHOD**

This research is a philosophical perspective research which adheres firmly to the concept of doctrinal research, (B, 2002) namely research that examines secondary legal materials along with primary legal materials in this case to answer the problems that are the focus of research that are conceptualized by law as rules or norms that are benchmarks for human behavior that are considered appropriate by considering philosophical values as an analytical tool in explaining. (Soemitro, 1985) The research was chosen by the author to research based on the norms and regulations that develop in society related to the development of views and thoughts related to feminism and regarding the views of society in it, especially in providing justice for women's rights in the midst of the shadow of plurality.



## **Discussion**

### **Critical Analysis of the Concept of Justice in Legal Philosophy Through a Feminist Jurisprudence Approach in the Context of a Plural Society**

Justice is a central concept in the philosophy of law that has been debated throughout the history of human thought. In the realm of classical philosophy, Aristotle is one of the main figures who offered a systematic framework for justice. In the *Nichomachean Ethics*, Aristotle states that justice is the highest moral virtue, which is related to obedience to applicable laws and social norms. (Rawls, 2011) He divides justice into two main forms, namely distributive justice and corrective justice. Distributive justice concerns how wealth, position, and rewards are distributed proportionally to members of society based on their respective contributions and capacities. Meanwhile, corrective justice concerns the restoration or correction of an injustice that has occurred, such as compensation in a civil dispute or punishment in the criminal realm. (Friedman, 1969) This view is rooted in the principle of equality, both in arithmetic (absolute equality) and geometric (proportional equality) forms. However, the Aristotelian framework of justice, despite its philosophical and logical relevance, is not free from criticism. One approach that critically reviews and reinterprets the concept of justice is feminist jurisprudence. Feminist jurisprudence is present as a form of resistance to the dominance of legal perspectives that have been influenced by patriarchal values for centuries. In the view of feminist jurisprudence, law is not neutral, but rather a cultural and historical product that absorbs and legitimizes social structures that oppress women. In a legally pluralistic society like Indonesia where national law coexists with customary law and religious law, this problem becomes increasingly complex. Justice, in this context, must be questioned again, especially regarding whose version of justice, for whom, and by what benchmark.

Feminist jurisprudence reveals that traditional law tends to ignore women's experiences and reinforces the position of men as the dominant legal subjects. (Patsun, 2019) Historically, women have often not been recognized as full owners of their own bodies and minds. Women in many societies do not have property rights, the right to vote, or the right to participate fully in legal and political decision-making. In the context of customary and religious law, which are often used as the basis for norms in plural societies, women's positions are often determined based on traditional roles such as wife, mother, or daughter, which obscures their legal status as autonomous individuals. When we examine justice from a feminist perspective, Aristotle's approach to



proportional or arithmetic justice becomes inadequate, especially since these principles do not take into account the social and historical context of gender inequality. For example, the idea that people who have "more achievements" deserve "more" in the social distribution will perpetuate male dominance if not viewed critically. This is because, in patriarchal societies, women often do not have equal opportunities to demonstrate "achievement" due to structural barriers such as discrimination in education, employment, and politics. Therefore, feminist jurisprudence demands a reinterpretation of justice, from formalist distributive and corrective justice to substantive and transformative justice that is sensitive to social context.

The feminist approach to law also encourages the *epiceia* or sense of what is proper that in Aristotelian philosophy is held by judges in interpreting the law. (Shidarta, 2006) However, *epiceia* in the classical tradition remains within the boundaries of general masculine values. In feminist jurisprudence, *epiceia* must involve women's real experiences, especially in the context of violence, discrimination, and exploitation. For example, in cases of domestic violence or sexual violence, the application of law that relies on formal logic without considering the dynamics of gender power and inequality of social relations will fail to realize true justice. In Indonesia, the application of the principles of feminist jurisprudence has begun to be seen in legal policies, such as the ratification of Law No. 23 of 2004 concerning the Elimination of Domestic Violence and Law No. 12 of 2022 concerning Criminal Acts of Sexual Violence. These two regulations are important achievements in the state's recognition of the need for special legal protection for women. However, its implementation still faces major challenges due to the patriarchal social structure and the lack of gender sensitivity of law enforcement officers. In the context of legal plurality, customary law and religious law often do not side with women. When a woman experiences domestic violence or discrimination in inheritance distribution, often the resolution through customary or religious mechanisms tends to maintain the status quo that is detrimental to women. State law, which should function as the last protector, often compromises in the name of respecting local wisdom or plurality of values. This is where feminist jurisprudence appears as a relevant approach to highlight how legal plurality can lead to structural injustice against women if not guarded by the principle of gender justice.

Feminist jurisprudence offers a highly relevant theoretical framework for reexamining the concept of justice in legal philosophy, especially in the context of a legally plural society. (Irianto, 2006) This approach proposes four main models that illustrate the spectrum of criticism of the patriarchal legal system. First, the liberal equality model emphasizes the importance of formal





equality in law, such as equal rights in employment, education, and legal protection. Although this model reflects the spirit of justice in Aristotelian theory that emphasizes numerical equality, this approach is considered insufficient to address structural gender inequality. Second, the sexual difference model recognizes that biological and social differences between men and women must be considered substantively in the formulation and application of law, so that there is no discrimination in the name of formal equality. This model challenges the assumption of the neutrality of classical law which often ignores the specific needs of women. Third, the dominance model starts from the assumption that law has become a tool of systemic male domination over women. In this framework, law is not a neutral product, but rather the result of a social structure that maintains male power. Fourth, the postmodern or anti-essentialist model rejects a single view of women's identity and emphasizes the importance of an intersectional approach to understanding justice. This model is in line with the criticism of universality in classical philosophy of justice which tends to eliminate differences and diversity in women's life experiences. (Rahmatiar, 2020)

In a pluralistic society like Indonesia, this feminist jurisprudence approach becomes increasingly important because gender inequality is not only produced by state law, but also by customary and religious law that is legitimized within the framework of legal pluralism. When the Aristotelian theory of justice bases justice on proportionality, the feminist approach demands a reinterpretation that justice is not merely a “fair” distribution according to abstract measures, but must consider the context of historical social inequality experienced by women. Therefore, in analyzing the concept of justice in the philosophy of law through a feminist jurisprudence approach, a rereading of the idea of justice as a dynamic process that sides with women’s concrete experiences is needed. (Retnani, 2017) Justice is not sufficiently measured by uniform legal measures, but must be linked to efforts to dismantle structural inequalities in law and culture. Only with this transformative and reflective approach can justice be realized in a legally and socially plural society.

### **Analysis Legal Pluralism Includes State, Customary, and Religious Law in Contributing to the Perpetuation of Gender Inequality in the Protection of Women's Rights in Indonesia**

Legal pluralism is a sociological and normative reality that marks legal life in Indonesia. In this context, legal pluralism means the existence of various legal systems that apply simultaneously, namely state law (positive), customary law, and religious law. (Nurdin, 2016) The existence of legal pluralism in Indonesia is a reflection of the complexity of the social and cultural structures that inhabit this archipelagic country. Although legal pluralism is often seen as a form of



recognition of diversity and inclusivity, in reality, this pluralistic legal structure can actually strengthen gender inequality, especially in the protection and fulfillment of women's rights. There are substantial inequalities that are structural, cultural, and legal, which collectively contribute to the marginalization of women, both in the private and public spheres. (Danardono, 2006) State law as a formal and nationally binding legal system should be the main instrument in ensuring the protection of women's rights. The Indonesian Constitution explicitly guarantees equal rights for every citizen regardless of gender, as stated in Article 27 paragraph (1) of the 1945 Constitution of the Republic of Indonesia which states that "All citizens have equal standing before the law and government and are required to uphold the law and government without exception." Furthermore, Law Number 7 of 1984 concerning the Ratification of the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) confirms Indonesia's commitment to ensuring gender equality. However, in practice, state law is often not strong enough to penetrate and reform patriarchal values that are rooted in society and reflected in customary and religious law. Rather than being a tool for social transformation, state law often compromises with other legal systems within a framework of pluralism that actually normalizes inequality.

Customary law, as a product of local culture and tradition, has its own place in the lives of Indonesian people. In many cases, customary law is used as a reference in resolving disputes over inheritance, marriage, divorce, and land ownership. Although some customary systems contain collective and harmonious values, many also contain gender bias that is detrimental to women. (Triantono, 2023) In patriarchal indigenous societies, for example, inheritance rights often favor male children over female children. In some areas, women are not considered the main heirs because after marriage, they are considered to have become part of the husband's family. Practices like this are not just social practices, but are legitimized through customary law that is respected in the structure of national legal pluralism. This is exacerbated by the state's attitude which tends to allow such discriminatory practices in the name of cultural and local autonomy. Concrete examples can be found in various regions such as Bali, Aceh, or indigenous communities in Nusa Tenggara, which adhere to a strong and layered customary law system. In the patrilineal customary system in Bali, for example, women tend not to receive inheritance rights to land or family assets, because they are considered to be leaving the nuclear family after marriage. The state does not intervene much in these practices because they are considered part of the "culture" that must be respected. However, this respect becomes problematic when the cultural values that are maintained actually negate women's constitutional rights as citizens. Thus, customary law in the context of legal





pluralism not only maintains gender inequality, but also creates a dilemma between protecting human rights and recognizing local diversity.

Furthermore, religious law also plays a major role in shaping the structure of gender inequality in Indonesia. In the context of Islam, for example, family law regulated in the Compilation of Islamic Law (KHI) still contains various gender-biased articles. Article 1 of the KHI defines the husband as the "head of the family" and the wife as the "housewife," which indirectly establishes hierarchical power relations and gender roles. In practice, the position of women as wives is seen as lower than that of husbands, both in family decision-making and in legal rights such as divorce, maintenance, and child custody. In the case of divorce, although women can file for divorce, the procedure is often more complicated and asymmetrical than talaq which can be carried out unilaterally by the husband. Moreover, the influence of conservative religious interpretations in society also strengthens the subordination of women. Many social norms are based on certain religious interpretations that limit women's freedom of movement, such as the obligation to wear certain clothes, the prohibition of traveling without a mahram, and restrictions on access to education or work. In the context of legal pluralism, the state provides space for religious interpretations to regulate the private sphere of society, especially in matters of marriage, divorce, and inheritance. However, without a critical approach based on equality, this religious law has the potential to become an instrument for perpetuating structured patriarchal domination. This shows that legal pluralism does not necessarily create substantive justice, especially when the values upheld come from unequal social power structures.

The main challenge in overcoming gender inequality in the plural legal system in Indonesia is the weak harmonization and coordination between state, customary, and religious laws. The state often acts ambiguously: on the one hand, it guarantees gender equality through the constitution and modern legislation, but on the other hand, it allows discriminatory practices that occur within the framework of customs and religion. This shows that the state does not yet have the political courage to assert the supremacy of human rights principles, especially women's rights, in the existing plural system. The compromise approach used by the state for the sake of social stability and cultural harmony actually backfires when women's groups become the most disadvantaged parties in the compromise. The role of feminist jurisprudence in this context is very important to analyze and criticize the contribution of legal pluralism to the perpetuation of gender inequality. (Susilastuti, 2022) Feminist jurisprudence rejects the notion that law is neutral or objective. Instead, this approach suggests that law is formed and implemented within a masculine



and patriarchal social structure, so that legal products and implementations are fraught with gender bias. (West, 1988) In the Indonesian context, feminist jurisprudence can be a basis for reformulating legal policies and encouraging revisions to legal instruments that are still discriminatory. This approach can also strengthen the struggle of civil society and women's organizations to fight for fair and equal women's rights, both in state law, customary law, and religion.

Efforts to reform gender-sensitive law within the framework of legal pluralism must be carried out holistically. It is not enough to simply pass progressive laws such as the Law on the Elimination of Domestic Violence or the Law on the Crime of Sexual Violence. Systematic efforts are also needed to dismantle customary and religious legal structures that discriminate against women. This includes reformulating norms, revising policies, training law enforcement officers and community leaders, and strengthening legal education that is inclusive of gender perspectives. The state must also affirm its commitment to the principles of equality by providing clear boundaries for customary and religious practices that conflict with women's human rights. Thus, legal pluralism in Indonesia is not only a challenge in creating substantive justice for women, but also a field of resistance to redefine the meaning of inclusive and transformative law. As long as state, customary, and religious laws are not harmonized within the framework of human rights and gender equality, legal pluralism will remain one of the main causes of the perpetuation of inequality and marginalization of women in Indonesia.

#### **4. CONCLUSION**

In the context of legal pluralism in Indonesia, customary and religious laws that are often maintained in the name of local wisdom and cultural autonomy, actually contain gender-biased norms and place women in a subordinate position. This is reflected in the practice of unequal inheritance distribution, male dominance in family institutions, and restrictions on women's roles in the social and political spheres. When state law fails to firmly intervene in these discriminatory practices, legal pluralism becomes an arena for the reproduction of legitimate structural inequality. In this case, the state has a great responsibility to ensure that legal plurality does not conflict with the principles of human rights and gender equality. Unfortunately, the state often acts ambiguously and compromisingly, thus weakening legal protection for women. The commitment to equality stated in the 1945 Constitution and the ratification of CEDAW should be the moral and legal basis for overhauling the discriminatory plural legal system. Feminist jurisprudence can be an ethical



and analytical framework for assessing and reforming legal policies to be more inclusive and responsive to women. Therefore, a systemic legal reform is needed that is not only normative, but also substantive. The state needs to harmonize state law, customary law, and religious law within the framework of protecting women's rights. In addition, strengthening gender-based legal education, training for law enforcement officers, and active involvement of women's communities in the legislative process are important strategies for realizing true justice. In the future, justice should no longer be understood as an abstract concept that is universal and gender-neutral, but rather as a contextual process that sides with the concrete experiences of groups that have been marginalized by the dominant legal system. Legal pluralism in Indonesia will only become a liberating normative wealth if all of its components are subject to the values of substantive justice and true equality.

## REFERENCE

- Ali, A. (2010). *Uncovering Legal Theory and Judicial Prudence Including Legislative Interpretation*. Jakarta: Kencana.
- Azizah, N. (2021). Feminist Streams and Gender Equality Theory in Law. *Journal of Gender Studies*, Vol. 1, No. 1, 1–10.
- B, S. (2002). *The Character of Normative and Sociological Legal Research*. Yogyakarta: PUSKUMBANGSI LEPPA UGM.
- Danardono, D. (2006). *Feminist Legal Theory: Rejecting Legal Neutrality, Celebrating Difference and Anti-Essentialism*. Semarang: Unika Soegijapranata.
- Friedman, L. M. (1969). *The Legal System: A Social Science Perspective*. New York: Russell Sage Foundation.
- Heri Setiawan, SO (2018). Gender Equality Issues in the Optics of Feminist Jurisprudence and Its Implementation in Indonesia. *Jurnal Jurisprudentie*, Vol. 5, No. 2, 121–140.
- Irianto, S. (2006). *Women and Law: Towards a Law with a Perspective of Equality and Justice*. Jakarta: Yayasan Obor Indonesia.
- Lapian, G. (2012). *Legal Discipline That Realizes Gender Equality and Justice*. Jakarta: Pustaka Obor Indonesia.
- Magdalena, R. (2017). The Position of Women in the Course of History (A Study of the Position of Women in Islamic Society). *Journal of Gender and Child Studies*, Vol. II, No. 1, 13–36.
- Muhammad Yahdi Urfan & Cintya Nurika Irma. (2023). Analysis of Marxist Feminism on the Main Characters in the Novel “Re” by Maman Suherman. National Seminar on Education.



- Natalis, A. (2020). Legal Reform in Order to Realize Justice for Women: A Feminist Jurisprudence Review. *Crepido Journal*, Vol. 2, No. 1, 11–23.
- Nurdin, FS (2016). Reconstruction of the Principle of Legality in Criminal Law Based on the Principle of Justice. *Legal Reflection: Journal of Legal Studies*, Vol. 1, No. 1, 1–13.
- Patsun, M. d. (2019). Understanding Philosophy Between the Practical Methods and Thoughts of Socrates, Plato, and Aristotle. *CENDEKIA: Journal of Islamic Studies*, Vol. 5, No. 1, 119–140.
- Rahmatiar, ID (2020). Women and Power Linked to Feminist Legal Theory. *Jurnal Jutitusi Hukum*, Vol. 5, No. 1, 90–101.
- Rawls, J. (2011). *A Theory of Justice, Theory of Justice, Basics of Political Philosophy to Realize Social Welfare in the State*. Yogyakarta: Pustaka Pelajar.
- Retnani, SD (2017). Feminism in the Development of Schools of Thought and Law in Indonesia. *Principium UKSW Journal of Law*, Vol. 1, No. 1, 95–109.
- Santoso, MA (2014). *Law, Morals, and Justice: A Study of Legal Philosophy*. Jakarta: Kencana.
- Shidarta, DD (2006). *Principles of Legal Philosophy: What and How is Legal Philosophy in Indonesia?* Jakarta: Ghalia Indonesia.
- Soemitro, RH (1985). *Legal Research Methodology and Jurimetrics*. Jakarta: Ghalia Indonesia.
- Susilastuti, MN (2022). Intersectionality And Discrimination Against Black Trans Women with a Criminal Record: The Case of Eisha Love. Yogyakarta: Universitas Gadjah Mada.
- Triantono. (2023). Feminist Legal Theory in the Indonesian Legal Framework. *Progressive Law and Society*, Vol. 1, Issue 1, 15–26.
- West, R. (1988). Jurisprudence and Gender. *The University of Chicago Law Review*, Vol. 55, no. 1, 645.

