

# "IMPLEMENTATION OF LEGAL PROTECTION FOR WELL-KNOWN BRANDS IN INDONESIA"

Lasargi Marel, Thamrin S, Abd Thalib, Syafrinaldi

Email: [lasargimarel@student.uir.ac.id](mailto:lasargimarel@student.uir.ac.id)

## ABSTRACT

In the business world, manufacturers provide distinctive signs or characteristics on their goods and services produced, commonly referred to as "brands," which are used to differentiate their production from that of others, especially for similar or related goods and services. Initially, brands were used to indicate ownership or source. Subsequently, brands functioned to indicate that a product originated lawfully from a business unit (corporation) and therefore also served to indicate that the product was made professionally. Consequently, brands have a second function, which is to serve as a guarantee of quality.

The main issue in this research is the legal consequences of registering a trademark with bad faith and the legal protection of well-known trademarks based on the Supreme Court's Jurisprudence No. 022 K/N/HaKI/2002. This study is a normative research, while in terms of its nature, it is descriptive-analytical. This means that the author will provide detailed, clear, and systematic explanations regarding the implementation of legal protection for well-known trademarks in Indonesia.

The Supreme Court Decision with Number 022 K/N/HKI/2002 seems to have been correctly applied to the Campina CORNETTO trademark owned by the Respondent in Cassation/Defendant, which is qualified as having substantial similarity in essence and as a whole with the CORNETTO trademark owned by the Applicant in Cassation/Plaintiff, and also qualified as riding on the well-known trademark owned by UNILEVER N.V. Therefore, the CORNETTO trademark owned by the Respondent in Cassation/Defendant must be rejected based on Law No. 20 of 2016 concerning Trademarks. Regarding the recognition of a trademark, the judge refers to the Supreme Court's jurisprudence, which is based on public knowledge. The trademark in question is obtained through promotions conducted by its owner, accompanied by evidence of the registration of the trademark in several countries. This decision also confirms that a well-known trademark that is not yet registered in Indonesia still receives legal protection in Indonesia, in accordance with Supreme Court's Jurisprudence No. 1272 K/Pdt/1984, dated January 15, 1986.

**Keywords: Implementation, Protection, Trademark, Well-known**

## A. Introduction

In the business world, manufacturers provide distinctive signs or characteristics on their goods and services, commonly referred to as trademarks, which are used to differentiate their production from that of others, especially for similar or related goods and services. Initially, trademarks were used to indicate ownership or source. Subsequently, trademarks functioned to indicate that a product originated lawfully from a business unit (corporation) and therefore also served to indicate that the product was made professionally. Consequently, trademarks have a second function, which is to serve as a guarantee of quality.

In Indonesia, regulations concerning trademarks are specifically governed by Law No. 20 of 2016 concerning Trademarks and Geographical Indications. This law is established to provide protection to trademark holders, both for goods and services trademarks as well as collective trademarks. Article 1 of the Trademark and Geographical Indications Law states that a trademark is a sign that can be displayed graphically in the form of a picture, logo, name, word, letter, number, color arrangement, in 2 (two) or 3 (three) dimensions, sound, hologram, or a combination of 2 (two) or more of these elements to distinguish goods and/or services produced by individuals or legal entities in the course of trade in goods and/or services. The law stipulates that trademarks cannot be registered based on applications submitted by applicants with bad faith. Almost all cancellation cases are based on bad faith, such as imitating paintings, and dishonestly submitting words and trademarks.

Article 1 of the law highlights that recognized trademarks are those that have been registered. In other words, trademark holders will only be acknowledged for their ownership if the trademark is registered. This aligns with the principle adopted in the Indonesian Trademark and Geographical Indications Law, known as the first to file principle.<sup>1</sup> Therefore, Law Number 20 of 2016 concerning trademarks and geographical indications regulates trademarks in Indonesia through a registration system. Regarding the reasons why a trademark may not be registered, these include lacking distinctiveness, being in the public domain, or being descriptive or related to

---

<sup>1</sup> Budi Agus Riswandi and M. Syamsudin, *Intellectual Property Rights and Legal Culture*, 1st edition, Raja Grafindo, Jakarta, 2004, p. 85

the goods/services for which registration is sought. These are commonly cited grounds for cancellation in commercial court proceedings. The symbol used in a trademark refers to the goods themselves and depicts the characteristics of the goods, such as the word "watch" or an image of a watch for watch-related products. Additionally, the law regulates well-known trademarks. Article 21(1) prohibits the Directorate General of Intellectual Property from accepting trademark applications if they are substantially or entirely identical to well-known trademarks owned by others for similar goods or services. Further provisions for dissimilar goods will be determined by government regulations. Regarding the concept of substantial similarity, as explained in Law No. 20 of 2016 concerning Trademarks and Geographical Indications, it refers to resemblances caused by prominent elements between one trademark and another, which can create the impression of similarity in terms of form, placement, writing style, or combinations of elements, as well as similarities in the sound of pronunciation found in those trademarks.<sup>2</sup>

Regarding the criteria for well-known trademarks, further elaboration is provided in the explanation of Law No. 20 of 2016 concerning Trademarks and Geographical Indications. The criteria for well-known trademarks, as explained in the Trademark and Geographical Indications Law, are as follows: acquired through extensive and large-scale promotion, investment in multiple countries worldwide by the owner, and supported by evidence of trademark registration in several countries. If the above criteria are deemed insufficient, the Commercial Court may order an independent institution to conduct a survey to determine whether the trademark is well-known or not. However, there are already guidelines issued by WIPO regarding factors to consider when determining whether a trademark is well-known or not. The relevant authorities must consider, among other things, the following:<sup>3</sup>

- a. The level of knowledge or recognition of the trademark within the relevant public sector.
- b. The duration and geographical scope of the trademark's use.
- c. The duration, scope, and geographical area of the trademark's promotion, including advertising and publicity, as well as presentations at exhibitions of goods or services bearing the trademark.

---

<sup>2</sup> Explanation of Article 6 paragraph 1 letter a of Law No. 20 of 2016 concerning trademarks and geographical indications.

<sup>3</sup> Achmad Zein Umar Purba, Intellectual Property Rights Post-TRIPs, 1st edition, PT Alumni, Bandung, 2000, p. 74

- d. The duration and geographical area of each registration and each application for registration to a level that reflects the use or recognition of the trademark.
- e. Records of successful law enforcement actions regarding the rights associated with the trademark to a level where the trademark is recognized as well-known by competent authorities.
- f. The value associated with the trademark.

The Trademark and Geographical Indications Law regulates the criteria for well-known trademarks in Article 21 paragraph (1) subparagraph b, which states:<sup>4</sup> "1. Considering the general public's knowledge of the trademark in the relevant business sector. 2. The reputation of the well-known trademark obtained through extensive and large-scale promotion and investment in multiple countries, accompanied by evidence of trademark registration in several countries (if available). If deemed insufficient, the Commercial Court may order an independent institution to conduct a survey to determine whether the trademark is well-known or not, which forms the basis for rejection."

However, there are still many cases of trademark infringement, especially against well-known trademarks, one of which involves the infringement of the well-known trademark of UNILEVER N.V (Plaintiff) against PT. CAMPINA ICE CREAM INDUSTRY (Defendant). In this case, UNILEVER N.V objected to the registration of the CORNETTO trademark by the Defendant on the grounds that the CORNETTO trademark had been owned by the Plaintiff since 1959 and was well-known, while the Defendant's CORNETTO trademark was only registered on January 12, 1988, with a renewal or extension on March 30, 1999. The registration of the Defendant's CORNETTO trademark was deemed to have been made in bad faith and to bear substantial similarity to the well-known CORNETTO trademark owned by the Plaintiff, and the Defendant was considered to have leveraged the reputation of the Plaintiff's well-known CORNETTO trademark. The recognition of the Plaintiff's CORNETTO trademark was demonstrated by the Plaintiff by providing evidence of registration in various countries and extensive and costly promotion efforts. At the Commercial Court level, the judge rejected the Plaintiff's lawsuit in its entirety with judgment number 29/MEREK/2002/PN.NIAGA.JKT.PST dated September 17, 2002, on the grounds that the registration of a trademark in several foreign countries does

---

<sup>4</sup> Explanation of Article 6 paragraph 1 letter b of Law No. 20 of 2016 concerning trademarks and geographical indications

not automatically prove the recognition of the Plaintiff's trademark, but only serves to protect the trademark in the country of registration. The Plaintiff also failed to prove that the CORNETTO trademark was known in Indonesia before being introduced by the Defendant, and the Defendant's registration could not be classified as being made in bad faith as stipulated in Article 21 paragraph 3 of Law No. 20 of 2016, because at the time of registration, the Indonesian public was not aware of the CORNETTO trademark, thus the intention to deceive consumers was not proven.

Based on the example case above, it is evident that trademark infringement, especially against well-known trademarks through leveraging, still occurs. Additionally, it highlights the existence of differing opinions and judicial reasoning among judges in resolving a case within the judicial system.

## **B. PROBLEM**

From the description above, the writer is interested in addressing a legal issue: How is the implementation of legal protection for well-known trademarks in Indonesia?

## **C. RESULT**

The extensive use of well-known trademarks by several local entrepreneurs is closely related to how crucial these trademarks are for the successful marketing of goods and services.<sup>5</sup> A trademark can be considered the "spirit" of a product or service. As an identifier and differentiator, a trademark can depict the assurance of the personality and reputation of the goods and services resulting from one's business endeavors when traded.<sup>6</sup>

The rampant infringement of rights over well-known trademarks in Indonesia is evident from the presence of local products bearing these well-known trademarks. In the trading practice, from street vendors to malls, various products using well-known trademarks, but actually mere imitations, can be easily found. One such infringement of a well-known trademark can be observed in the case of the CORNETTO trademark, which is involved in the production of cone-shaped ice cream.<sup>7</sup>

---

<sup>5</sup> Insan Budi Maulana, op cit, p. 97

<sup>6</sup> Wiratmo Dianggoro, "About Trademarks and Their Impact on the Business World", Business Law Journal, Volume 2, p. 34

<sup>7</sup> Ridwan Khairandy, "Trademark Legal Protection and Enforcement Problems", in Insan Budi Maulana, Ridwan Khairandy, and Nurjihad (eds), Selected Topics in Intellectual Property I, Center for Legal Studies, Faculty of Law UII - HaKI Clinic Jakarta, Yogyakarta, 2000, p. 111

Regarding the case of infringement of the well-known CORNETTO cone ice cream trademark mentioned above, the writer will attempt to analyze and draw conclusions regarding the court's decision on this CORNETTO case. The legal considerations mentioned above are not in line with trademark law doctrine and the Law itself. The recognition of an international trademark implies that the trademark is also well-known in Indonesia. This is a legal doctrine affirmed through Supreme Court Jurisprudence Number 1272 K/Pdt/1984, dated January 15, 1986, which states, "Legally, in accordance with good trade morals, traders are obliged to refrain from any efforts to exploit the fame of another person's trademark (national/foreign), even if the trademark is not yet registered in Indonesia, and even if the trademark is foreign and has not yet entered the territory of the Republic of Indonesia." This can be interpreted to mean that trademark registration in various countries is not a guarantee that a trademark is well-known, and there are no specific criteria defining well-known trademarks through competent Intellectual Property Rights institutions.

The Law No. 15 of 2001 on Trademarks, which has been amended and is now Law No. 20 of 2016 on Trademarks and Geographical Indications, along with the Jurisprudence of the Supreme Court of the Republic of Indonesia and the World Intellectual Property Organization (WIPO), have indeed affirmed that trademark registration in countries worldwide indicates that the registered trademarks are well-known trademarks.

The criteria for determining the recognition of a trademark based on its registration in various countries are also supported by the following Jurisprudence of the Supreme Court of the Republic of Indonesia:<sup>8</sup>

- a. Supreme Court Jurisprudence No. 1486 K/Pdt/1991 dated November 28, 1995;
- b. Supreme Court Jurisprudence No. 426 PK/Pdt/1994 dated November 3, 1995;
- c. Article 16 paragraph (2) of the TRIPS Agreement;
- d. Supreme Court Jurisprudence No. 3485 K/Pdt/1992 dated September 20, 1995;
- e. Supreme Court Jurisprudence No. 49 PK/Pdt/1989 jo No. 3258 K/Pdt/1987.

The petitioner for cassation has obtained trademark registration for CORNETTO in various countries, thereby fulfilling one of the criteria for the recognition of a trademark, as stipulated in Article 6 paragraph (1) letter (b) of Law No. 15 of 2001 on Trademarks, Supreme Court Jurisprudence No. 1486 K/Pdt/1994 dated November 3, 1995, Supreme Court Jurisprudence No. 426 PK/Pdt/1994 dated

---

<sup>8</sup> ibid

November 3, 1995, and guidelines formulated by The Committee of Experts on Well-Known Marks of WIPO regarding the criteria for well-known trademarks.

This can lead to a perception among the public that the Campina CORNETTO trademark owned by the Respondent/Appellant is one legal entity or company with the CORNETTO trademark owned by the Petitioner/Appellant, and this could disadvantage the Petitioner/Appellant and conversely benefit the Respondent/Appellant. Article 4 of the Trademark Law states: "A trademark cannot be registered based on an application submitted by an applicant who acts in bad faith."

In accordance with the explanation of Article 4 of Law No. 15 of 2001 on Trademarks, which is now Article 21 paragraph 3 of Law No. 20 of 2016 on Trademarks and Geographical Indications, an applicant acting in good faith is one who registers their trademark appropriately and honestly without any intention to exploit, imitate, or plagiarize the fame of another party's trademark for the benefit of their business, resulting in losses for others or creating conditions of unfair competition, deception, or misleading consumers. Based on concrete facts and evidence presented during the trial, it seems that the Campina CORNETTO trademark owned by the Respondent/Appellant has been proven to exploit the well-known CORNETTO trademark owned by the Petitioner/Appellant, which has been known for decades. Therefore, it is clear that the Campina CORNETTO trademark with Registration Number 425985 should be rejected based on Article 6 paragraph 3 of Law No. 15 of 2001 on Trademarks, which is now Article 21 of Law No. 20 of 2016 on Trademarks and Geographical Indications, because it shares similarities in essence and overall and also exploits the fame of the CORNETTO trademark owned by the Petitioner/Appellant. Based on Article 68 of Law No. 15 of 2001 on Trademarks, which is now Article 76 of Law No. 20 of 2016 on Trademarks and Geographical Indications, it would be reasonable to file a cancellation lawsuit against the Campina CORNETTO trademark owned by the Respondent/Appellant from the Trademark Register by the Petitioner/Appellant. Article 6 of Law No. 15 of 2001 on trademarks, which is now Article 21 of Law No. 20 of 2016 on Trademarks and Geographical Indications, states: Article 6 of Law No. 15 of 2001 on trademarks states:<sup>9</sup>

"The application must be rejected by the Directorate General if the trademark:

---

• <sup>9</sup> Article 21, Law Number 20 of 2016, concerning Trademarks and Geographical Indications

- a. Has similarities in essence or overall with a trademark owned by another party that has been registered earlier for similar goods and/or services;
- b. Has similarities in essence or overall with a well-known trademark owned by another party for similar goods and/or services;
- c. Has similarities in essence or overall with known geographical indications."

Article 21 of Law No. 20 of 2016 on Trademarks and Geographical Indications currently states:

- 1) The application shall be rejected if the trademark has similarities in essence or overall with:
  - a. Registered trademarks owned by others or applied for earlier by others for similar goods and/or services.
  - b. Well-known trademarks owned by others for similar goods and/or services.
  - c. Well-known trademarks owned by others for dissimilar goods and/or services that meet certain requirements.
  - d. Registered geographical indications.
- 2) The application shall be rejected if the trademark:
  - a. Represents or resembles the name or abbreviation of the name of a famous person, photo, or the name of a legal entity owned by others, except with written consent from the rightful owner.
  - b. Represents an imitation or resembles the name or abbreviation of the name, flag, symbol, or emblem of a country, or national or international institution, except with written consent from the competent authority.
  - c. Represents an imitation or resembles the official mark or seal used by the state or government institution, except with written consent from the competent authority.
- 3) The application shall be rejected if submitted by an applicant acting in bad faith.
- 4) Further provisions regarding the rejection of trademark applications as referred to in paragraphs (1) (a) to (c) shall be regulated by Ministerial Regulation.

Article 68 of Law No. 15 of 2001 on Trademarks, which is currently Article 76 of Law No. 20 of 2016 on Trademarks and Geographical Indications, states:

## **Article 68**

- 1) Cancellation lawsuits of trademark registrations may be filed by interested parties based on the reasons as referred to in Articles 4, 5, and 6.
- 2) Owners of unregistered trademarks may file a lawsuit as referred to in paragraph (1) after submitting an Application to the Directorate General.
- 3) Lawsuits for cancellation as referred to in paragraph (1) shall be filed with the Commercial Court.
- 4) In cases where the plaintiff or defendant resides outside the territory of the Republic of Indonesia, the lawsuit shall be filed with the Commercial Court in Jakarta.

## **Article 76**

"Lawsuits for the cancellation of trademark registrations may be filed by interested parties based on the reasons as referred to in Articles 20 and/or 21."

The criteria for determining a famous trademark, as explained in Article 6 paragraph 1 letter c of Law No. 15 of 2001 on Trademarks, which has now been refined into Article 21 paragraph 1 letter d of Law No. 20 of 2016 on Trademarks and Geographical Indications, state that a trademark can be considered famous if:<sup>10</sup>

### **Article 6 paragraph 1:**

The application must be rejected by the Directorate General if the trademark:

- a. Is identical or similar to a trademark owned by another party that has been registered earlier for similar goods and/or services;
- b. Is identical or similar to a well-known trademark owned by another party for similar goods and/or services.
- c. Is identical or similar to a known geographical indication.

### **Article 20 paragraph 1:**

The application shall be rejected if the trademark:

- a. Is identical or similar to a registered trademark owned by another party or applied for earlier by another party for similar goods and/or services.

---

<sup>10</sup> Law No. 15 of 2001 Concerning Trademarks and Law Number 20 of 2016, Concerning Trademarks and Geographical Indications.

- b. Is identical or similar to a well-known trademark owned by another party for similar goods and/or services.
- c. Is identical or similar to a well-known trademark owned by another party for dissimilar goods and/or services that meet certain requirements.
- d. Is identical or similar to a registered geographical indication.

If the above factors are not deemed sufficient, the Commercial Court may instruct an independent institution to conduct a survey to determine whether the trademark in question is famous or not, which forms the basis for rejection. Based on the articles and explanations provided, it can be argued that the CORNETTO trademark owned by the Applicant/Appellant can be categorized as a famous trademark. This is evidenced by the Applicant providing proof of registration in various countries, investments in multiple countries, and extensive promotion through television advertisements and mass media. Additionally, the CORNETTO trademark owned by the Respondent/Defendant can also be qualified as having similarity in essence and overall with the CORNETTO trademark owned by the Applicant/Appellant, as both use the word CORNETTO with the same spelling, pronunciation, and combination of written and spoken form.

Furthermore, Supreme Court Jurisprudence No. 1272 K/Pdt/1984, dated January 15, 1986, states: "Legally, in accordance with good trade practice, traders are obliged to refrain from any attempt to capitalize on the fame of another party's trademark (national/foreign), even if the trademark has not been registered in Indonesia or even if the foreign trademark has not entered the territory of the Republic of Indonesia."<sup>11</sup> Supreme Court Jurisprudence No. 1486 K/Pdt/1991, dated November 28, 1995, explains: "A trademark falls within the concept of a well-known mark essentially when it has circulated beyond regional boundaries and even to transnational boundaries. If it is proven that a trademark has been registered in many countries worldwide, then it qualifies as a well-known mark because it has circulated beyond the boundaries of its country of origin."

Based on the jurisprudence above, even though the CORNETTO trademark owned by the Applicant/Appellant has not been registered in Indonesia, it should still receive protection under Law No. 15 of 2001, which is now Law No. 20 of 2016 concerning Trademarks and Geographical Indications. The legal protection provided

---

<sup>11</sup> Ibid.

by Law No. 20 of 2016 concerning Trademarks and Geographical Indications in Indonesia is by rejecting the registration of trademarks by any company to use the CORNETTO trademark or other well-known trademarks in Indonesia. Trademarks that have circulated beyond their country's borders and have been proven to be registered in various countries worldwide can be categorized as well-known marks. The Campina CORNETTO trademark owned by the Respondent/Defendant can be qualified as a trademark that capitalizes on the CORNETTO trademark owned by the Applicant/Appellant because the CORNETTO trademark owned by the Applicant/Appellant is also considered a well-known trademark, just like the KEEN trademark which is well-known outside Indonesia but shares similarities with the KEEN trademark in Indonesia with only a few months difference in the trademark registration, representing a well-known trademark that should be protected in Indonesia.

Trademarks provide protection and assurance of quality to consumers, enabling them to make informed choices or alternatives regarding the goods or services they use. They offer a guarantee of value or quality and serve as the identity of the associated goods or services.<sup>12</sup> Moreover, trademarks can also become a valuable asset for a company if the goods or services produced under that trademark become widely used by the public. In this scenario, the trademark in question becomes a "key word" for consumers when purchasing a particular product or service.<sup>13</sup>

Law enforcement efforts against trademark violations, especially those involving well-known trademarks, often lead to confusion. This is determined by elements such as the similarity of trademarks among the brands involved, the similarity of the produced goods, competitive usage, consumer caution levels, actual confusion, and the intent to deceive.<sup>14</sup>

In addition to trademark piracy, there are counterfeiters or imitators of brands, both openly and covertly, who infringe on the trademarks of others. Infringement of another's trademark involves outright imitation or substantial imitation of the trademark. In cases of imitation, counterfeiting, piracy, and unfair competition, it

---

<sup>12</sup> Suyud MargoNo and Longginus Hadi, *Renewal of Trademark Legal Protection*, Novindo Pustaka Mandiri, Jakarta, 2002, p. 28

<sup>13</sup> Trisno Raharjo, "Analysis of Legal Considerations of Judges in Decisions on Famous Trademark Cases in Indonesia", Research Report, Yogyakarta, UMY, 1999, p. 1

<sup>14</sup> Efendy Hasibuan, *Trademark Protection, Study of Indonesian and American Court Decisions*, Postgraduate Program, Faculty of Law, University of Indonesia, Jakarta, 2003, p. 121

must be proven that the imitated and counterfeited trademark indeed belongs to the claimant.<sup>15</sup>

Intellectual Property Rights, which some consider a newly emerging branch of law, have actually been known for quite some time, dating back to around the 15th century in Europe, particularly in Germany. International provisions have also been in place for a long time, such as the Paris Convention for the Protection of Industrial Property in 1883.<sup>16</sup>

Whether there is imitation or counterfeiting of a trademark must be proven by the judge in court because it involves a "likelihood of confusion." To determine the "likelihood of confusion," the judge needs to assess the "distinctiveness" and the "secondary meaning" of the disputed trademark. Another aspect the judge considers is unfair competition aimed at enriching oneself dishonestly through confusing surveys or testing that misleads consumers, either due to infringement or deception.<sup>17</sup>

#### **D. CONCLUSION**

Famous trademarks that are not yet registered in Indonesia still receive legal protection in Indonesia in accordance with the Supreme Court's Jurisprudence No. 1272 K/Pdt/1984, dated January 15, 1986, which states, "Legally, in accordance with good trade practice, traders are obliged to refrain from any efforts to ride on the fame of another party's trademarks (national/foreign), even if those trademarks are not yet registered in Indonesia or even if the foreign trademarks have not entered the territory of the Republic of Indonesia."

#### **REFERENCES**

Achmad Zein Umar Purba, Intellectual Property Rights Post-TRIPs, 1st edition, PT Alumni, Bandung, 2000,

Budi Agus Riswandi and M. Syamsudin, Intellectual Property Rights and Legal Culture, 1st edition, Raja Grafindo, Jakarta, 2004.

---

<sup>15</sup> Efendy Hasibuan, Trademark Protection, Study of Indonesian and American Court Decisions, Postgraduate Program, Faculty of Law, University of Indonesia, Jakarta, 2003, p. 121

<sup>16</sup> *ibid*

<sup>17</sup> *ibid*

Efendy Hasibuan, Trademark Protection, Study of Indonesian and American Court Decisions, Postgraduate Program, Faculty of Law, University of Indonesia, Jakarta, 2003,

Wiratmo Dianggoro, "About Trademarks and Their Impact on the Business World", Business Law Journal, Volume 2,

Ridwan Khairandy, "Trademark Legal Protection and Enforcement Problems", in Insan Budi Maulana, Ridwan Khairandy, and Nurjihad (eds), Selected Topics in Intellectual Property I, Center for Legal Studies, Faculty of Law UII - HaKI Clinic Jakarta, Yogyakarta, 2000,

Suyud MargoNo and Longginus Hadi, Renewal of Trademark Legal Protection, Novindo Pustaka Mandiri, Jakarta, 2002,

TrisNo Raharjo, "Analysis of Legal Considerations of Judges in Decisions on Famous Trademark Cases in Indonesia", Research Report, Yogyakarta, UMY, 1999,