

**SUPREME COURT SETS A MAXIMUM TIME LIMIT
FOR FILING A JUDICIAL REVIEW
ON THE BASIS OF FRAUD OR DECEPTION BY THE OPPOSING PARTY**

September 2025

On 8 August 2025, the Supreme Court issued a letter setting out the timeline that a party who has lost a case at the Supreme Court may file a judicial review of the decision, if they believe the decision has been influenced by fraud or deception by the opposing party.¹

This letter is issued as guidance to the High Courts and District Courts across Indonesia in connection with the filing of judicial reviews in Civil law cases (including Religious law cases and Administrative law cases), as referred to in Article 67(a) of Law No. 14 of 1985 regarding the Supreme Court.

The key points of this letter are as follows:

1. The statute of limitation for filing a judicial review with respect to:
 - a. a decision rendered on the basis of fraud or deception by the opposing party, discovered after the rendering of the decision, is 180 days commencing from the date of fraud or deception being discovered; and
 - b. a decision rendered on the basis of evidence that is subsequently declared false by a criminal court, is 180 days commencing from the date of criminal decision becomes final and binding and has been notified to the parties.
2. The 180-day period starts on the date that new evidence is discovered.
3. The discovery of new evidence must be declared under oath and certified by an authorized official as well as being recorded in minutes (*berita acara*). Such minutes shall become one of the prerequisite documents for filing a judicial review on the basis of fraud and/or deception.

Our litigation team will be happy to discuss any questions you might have. For further assistance and inquiries, please contact Made Barata, Partner (mb@mkklaw.net).

¹ Supreme Court Clerk Letter No. 835/PAN/HK2/VIII/2025 regarding Time Line to File Judicial Review Application with respect to the Decision Rendered on the Basis of Fraud or Deception by the Opposing Party, Discovered Following the Rendering of the Decision