

Legal Justice Analysis in the Court Decision on the Urban Light vs. Love Light Artwork Copyright Dispute

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ABSTRACT

This study aims to analyze the principles of legal justice embodied in Decision Number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst., concerning the copyright dispute between the artwork “Urban Light” by Chris Burden and the “Love Light” installation at Rabbit Town. The research employs a normative juridical method, utilizing statutory and case approaches to examine the relevance of Law Number 28 of 2014 on Copyright and its application in the court’s judgment. The data used are secondary, comprising legislation, court decisions, and related legal literature, analyzed descriptively and qualitatively. The findings reveal that the panel of judges has duly considered distributive, commutative, and procedural justice by providing comprehensive protection of the moral and economic rights of the creator. The decision affirms that unauthorized reproduction and adaptation of copyrighted works constitute infringement, ensuring a balanced consideration of the rights of creators and users. Furthermore, this ruling is expected to serve as a significant precedent for copyright protection in Indonesia and to enhance public legal awareness regarding the importance of respecting intellectual property rights.

ABSTRAK

Analisis Keadilan Hukum dalam Putusan Pengadilan atas Sengketa Hak Cipta Karya Seni Urban Light vs. Love Light. Penelitian ini bertujuan untuk menganalisis nilai keadilan hukum dalam Putusan Nomor 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. terkait sengketa hak cipta antara karya seni “Urban Light” ciptaan Chris Burden dan instalasi “Love Light” di Rabbit Town. Penelitian menggunakan metode yuridis normatif dengan pendekatan perundang-undangan dan pendekatan kasus, menelaah relevansi Undang-Undang Nomor 28 Tahun 2014 tentang Hak Cipta serta penerapannya dalam putusan tersebut. Data yang digunakan adalah data sekunder berupa peraturan perundang-undangan, putusan pengadilan, serta literatur hukum terkait, yang dianalisis secara deskriptif-kualitatif. Hasil penelitian menunjukkan bahwa Majelis Hakim telah mempertimbangkan keadilan distributif, komutatif, dan prosedural dengan memberikan perlindungan penuh terhadap hak moral dan hak ekonomi pencipta. Putusan ini menegaskan bahwa tindakan peniruan karya tanpa izin merupakan pelanggaran hak cipta, serta memberikan keseimbangan kepentingan antara pencipta dan pengguna. Putusan tersebut juga diharapkan menjadi preseden penting dalam perlindungan hak cipta di Indonesia dan meningkatkan kesadaran hukum masyarakat terkait pentingnya menghormati hak kekayaan intelektual.

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Introduction

The phenomenon of copyright infringement in Indonesia has shown a significant upward trend, in line with the rapid development of digital technology and increasingly accessible information channels (Sofia, Disemadi, & Agustianto, 2024; Dhani, Disemadi, & Sudirman, 2024; Edgina, et al 2024). Data from the Directorate General of Intellectual Property (*Direktorat Jenderal Kekayaan Intelektual/DJKI*) records that the number of copyright infringement cases rose from 46 cases in the previous year to 53 cases in the following year. In addition, DJKI, in collaboration with the Ministry of Communication and Information Technology (*Kementerian Komunikasi dan Informatika/Kominfo*), has shut down thousands of websites violating copyright regulations in Indonesia, particularly during the COVID-19 pandemic when digital platform usage surged (Direktorat Jenderal Kekayaan Intelektual, 2024). These infringements encompass various forms, such as the unauthorized distribution of pirated music, films, books, and software without the consent of the creators or copyright holders (Am Badar, 2024).

This situation not only causes economic harm to creators but also undermines their moral rights, as regulated by Law No. 28 of 2014 on Copyright. Piracy diminishes the potential income of creators and discourages them from producing new works, which may eventually hinder cultural and innovation development within society (Rifda, 2024). Furthermore, the low public awareness regarding intellectual property rights significantly contributes to the widespread nature of these infringements (Salsabila, 2023). According to ASEAN data, public awareness in Indonesia regarding intellectual property protection is below 10%, indicating that many parties are still unaware of the importance of copyright protection (Lembaga Kajian Keilmuan Fakultas Hukum Universitas Indonesia, nd.). The high rate of copyright infringement underscores the necessity for law enforcement efforts that ensure not only legal certainty but also a sense of justice for all parties involved, both creators and users.

Data obtained from the Directory of Decisions of the Supreme Court of the Republic of Indonesia/*Direktori Putusan Mahkamah Agung Republik Indonesia* (accessed on March 20, 2025) reveal a high frequency of copyright infringement cases adjudicated in Indonesian courts. The Supreme Court/*Mahkamah Agung* recorded a total of 172 copyright infringement cases reaching the cassation level. At the district court/*pengadilan negeri* level, the Central Jakarta District Court leads with 31 cases, followed by Surabaya District Court with 22 cases, and Semarang District Court with 9 cases. Several other courts, such as Andoolo District Court and Sungai Liat District Court, handled 2 cases each. Additionally, courts in various other regions, including Bantul, Jombang, Karanganyar, Kepanjen, Malang, Tebo, and several religious courts, each handled 1 case. This data indicates that copyright infringement cases are widespread across Indonesia, not limited to major cities, emphasizing the urgency for effective legal enforcement and equitable public understanding of copyright protection throughout the country. One case that has garnered considerable attention is Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst., which serves as a concrete example of how Indonesian courts adjudicate copyright infringement disputes. This decision raises various critical aspects regarding copyright protection and how the interests of the involved parties are accommodated within judicial proceedings.

The novelty of this research lies in its focused analysis of the substantive justice considerations within Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst., a subject that has not been extensively explored in prior studies. Unlike previous research by Ujang Badru Jaman, Galuh Ratna Putri, and Tiara Azzahra Anzani (2021), which primarily addresses general copyright protection in the digital era, or Abu Churairah, Mahmul Siregar, and Taufik Siregar (2011), which discusses copyright infringement of fine arts in the context of international conventions, this study evaluates how the court balances copyright protection and the interests of all parties within the framework of substantive justice. Moreover, this research complements studies by Maya Jannah (2018), R. Adhitya Nugraha Triantoro & Hernawan Hadi (2019), and Sigit Wibowo (2024), which focus more on normative protection of

copyright holders and moral-economic rights. This study offers new contributions by assessing the extent to which the court's considerations have accommodated principles of justice holistically—not only emphasizing formal protection of copyrights but also ensuring proportional protection of all stakeholders involved in the dispute.

Method

This study employs a normative juridical research method. Normative juridical research focuses on examining law as a set of written norms or rules, as codified in statutory regulations and court decisions (Tan, 2021; Benuf & Azhar, 2020). The rationale for utilizing this method lies in the nature and objective of the research, which centers on analyzing the principles of justice reflected in the court's decision (Disemadi, 2022). Therefore, it necessitates a thorough assessment of applicable legal norms and their implementation in concrete cases. The research applies two primary approaches: the statute approach and the case approach, aimed at evaluating the relevance of legal provisions in relation to the factual circumstances of the decision under review. The data utilized in this research are secondary data, which are obtained indirectly through primary legal materials, such as statutory laws and judicial decisions, specifically Law Number 28 of 2014 on Copyright and the Court Decision Number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. Data collection is conducted through literature study, and the data are analyzed descriptively and qualitatively to illustrate and evaluate the application of justice values within the analyzed court ruling.

Results and discussion

Juridical review of copyright protection in Indonesia. The regulation of copyright protection in Indonesia is fundamentally rooted in the principles enshrined in the 1945 Constitution of the Republic of Indonesia (UDN NRI 1945). Specifically, Article 28C paragraph (1) emphasizes that every individual has the right to develop themselves through the fulfillment of basic needs, including access to the benefits of science, technology, arts, and culture, in order to improve their quality of life. Additionally, Article 33 of the Constitution mandates that all national wealth, including intellectual property, must be managed for the greatest benefit of the people. These constitutional provisions form the philosophical foundation for Indonesia's copyright regulations, balancing the interests of individual creators with the broader interests of society. Copyright is thus positioned as a crucial instrument in enhancing both the welfare of creators and the general public. It is recognized not only as a form of acknowledgment of an individual's creative work but also as a moral and economic right inherently attached to the creator. Moreover, the regulation of copyright supports national development by fostering progress in science, technology, arts, and culture, thereby promoting innovation and strengthening the competitive edge of the creative economy at both national and international levels (Disemadi, Girsang, & Selina, 2023; Hutaaruk, Disemadi, Sudirman & Tan, 2023).

The legal basis for copyright protection in Indonesia is stipulated under Law No. 28 of 2014 on Copyright (Copyright Law), which replaced the previous Law No. 19 of 2002. This law reinforces copyright protection by clearly defining in Article 1 paragraph (1) that copyright constitutes an exclusive right automatically vested in the creator upon the materialization of the work in a tangible form. Copyright protection encompasses two main categories of rights: moral rights and economic rights. Moral rights, as regulated in Articles 5 to 7, include the right of the creator to be acknowledged by name, to make alterations, to preserve the integrity of the work, and to protect it from distortion or mutilation. Economic rights, detailed in Articles 8 to 19, provide creators with exclusive control to derive financial benefits from their works, including rights related to reproduction, distribution, public announcement, rental, and communication of the work.

In addition to conferring rights, the Copyright Law also imposes obligations on all parties to respect copyright. Article 9 paragraph (3) explicitly prohibits any unauthorized reproduction or

commercial use of copyrighted works. Furthermore, Article 10 forbids commercial entities from allowing the circulation of pirated goods. Additional prohibitions are outlined in Articles 50 and 51, which prohibit the distribution of works that conflict with public morals, religious values, or national security. Concerning the duration of copyright protection, Articles 58 to 61 specify that copyright lasts for 70 years after the creator's death for literary, musical, and similar works, and for 50 years for works such as photography, computer programs, and cinematography, while certain moral rights endure indefinitely. The Copyright Law also adopts international standards by incorporating Indonesia's commitments under various international treaties, including the TRIPs Agreement and the Berne Convention (Regent, Firdausa, Roselvia, Hidayat, & Disemadi, 2021; Auralita, 2023), as referenced in Article 2, thereby reinforcing the country's commitment to the global protection of copyright.

Analysis of decision number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. from the perspective of legal justice. This case originated from a lawsuit filed by Nancy J. Rubins, a United States citizen, acting as the legal heir of the late Christopher Lee Burden (Chris Burden), an American artist renowned for his sculpture titled "Urban Light." The plaintiff, through her legal counsel, filed a lawsuit against two parties: PT Pasti Makan Enak as Defendant I and Henry Husada as Defendant II. Defendant I is a company based in Bandung managing a selfie tourism attraction known as Rabbit Town, while Defendant II is the landowner and initiator of Rabbit Town located in Bandung.

The object of dispute in this case concerns the artwork "Urban Light" created by Chris Burden, which consists of 202 antique street lamps arranged in rows, serving as an iconic symbol of Los Angeles, United States. The plaintiff accused Defendant I and Defendant II of blatantly imitating and modifying "Urban Light" into an installation called "Love Light" displayed at Rabbit Town. The installation comprises 88 street lamps arranged in a similar row formation and visual appearance, which is deemed substantially identical to "Urban Light."

The legal standing of the parties is clear. The plaintiff claims to hold both moral and economic rights over "Urban Light" as the lawful heir of Chris Burden, arguing that the defendants violated copyright by replicating the work without permission and commercially profiting from the use of the installation. Conversely, Defendant I, as the operator of Rabbit Town, denies the infringement allegations, asserting that "Love Light" is an original creation, while Defendant II contends that he has no direct legal relationship with the operation of Rabbit Town and thus filed an objection on the grounds of misidentification of parties (error in persona).

In essence, the plaintiff sought compensation for both material and immaterial damages resulting from the alleged copyright infringement by the defendants. Additionally, the plaintiff requested the court to order the defendants to cease all commercial activities related to "Love Light," dismantle the infringing installation, and issue a public apology through mass media and social media platforms. This decision garnered significant attention due to its critical implications for the recognition of international copyright and legal justice for creators of artistic works.

In Decision Number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst., the panel of judges, comprising Dulhusin, S.H., M.H. as the presiding judge, along with Makmur, S.H., M.H. and Agung Suhendro, S.H., M.H. as associate judges, provided legal considerations based on Law No. 28 of 2014 concerning Copyright (Copyright Law). The judges emphasized that Indonesia's copyright protection system is declarative in nature, meaning copyright automatically vests in the creator once the work materializes in a tangible form without requiring prior registration. The panel determined that the plaintiff, Nancy J. Rubins, as the lawful heir of Chris Burden, had legitimate legal standing to file the lawsuit, supported by evidence such as marriage certificates, wills, and official statements from the Los Angeles authorities, substantiating her claim to moral and economic rights over the work.

In interpreting the Copyright Law, the panel underscored the importance of moral rights as regulated in Articles 5 to 7, including the right of the creator to be acknowledged by name and to protect their work from distortion without consent. The judges concluded that the defendants' act of imitating and modifying "Urban Light" into "Love Light" without crediting the original creator violated the creator's moral rights. Furthermore, the commercialization of the installation without permission was deemed a violation of the plaintiff's economic rights as the rightful heir.

In their legal reasoning, the judges rejected the defendants' objection of misidentification of parties (*error in persona*), asserting that the plaintiff had the right to determine who caused the alleged harm in accordance with civil procedural law. The panel also dismissed the defense claiming that "Urban Light" was not well-known in Indonesia, noting that evidence presented in court showed Defendant II had personally visited and photographed himself at the "Urban Light" installation, indicating his awareness and inspiration drawn from the artwork.

The judges further evaluated the case under Article 44 paragraph (1) of the Copyright Law, which prohibits plagiarism, identifying two conditions for plagiarism: substantial similarity and the absence of originality. In this case, the resemblance between "Love Light" and "Urban Light" was deemed substantial due to the composition, arrangement, and distinctive elements of the original work being adapted without permission. The panel also denied the plaintiff's provisional request to halt all Rabbit Town activities prior to a legally binding verdict, reasoning that Rabbit Town offered additional attractions beyond "Love Light" that were educational in nature. Nonetheless, in the principal matter, the court ruled that the defendants infringed on copyright, ordered the dismantling of the "Love Light" installation, and imposed a compensation payment of IDR 1,000,000,000, alongside an obligation to publish a public apology in national media and social platforms.

Overall, Decision Number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. reflects the judiciary's commitment to upholding legal justice for creators, particularly Nancy J. Rubins as the lawful heir of Chris Burden. In terms of distributive justice (Taufik, 2013; Alifa, 2024) (*distributive justice refers to the fair and proportional allocation of rights, resources, and responsibilities among members of society based on their contributions, needs, or merits*) (Taufik, 2013; Alifa, 2024), the decision fulfilled its principle by ensuring that the rights and economic benefits of "Urban Light" remained with the rightful owner, namely the creator or their heirs. The court mandated Defendant I and II to compensate for both material and immaterial damages derived from the unauthorized use of "Love Light," ensuring that economic rights were allocated appropriately.

Regarding commutative justice (*commutative justice refers to the principle of fairness that emphasizes equal treatment and balance in transactions or relationships between parties, ensuring that each party receives what is rightfully due without unjust enrichment or loss*) (Ramon, 2019; Ramon, 2020), the decision adhered to the principle of equality between the disputing parties. The judges determined that the defendants' unauthorized use of the copyrighted work constituted a violation of the creator's exclusive rights. The ruling imposed an obligation on the defendants to rectify the losses incurred and to cease all commercial activities involving the "Love Light" installation, thereby preserving the balance between the rights of creators and users without unilateral harm.

From a procedural justice standpoint (*procedural justice refers to the principle that legal processes and decision-making must be conducted fairly, transparently, and impartially, ensuring that all parties have equal opportunity to present their case and be heard*) (Yunanto, 2019; Pratiwi, 2013; Bola, M., Librayanto, & Arisaputra, 2015), the trial process followed the applicable legal procedures. The judges provided both parties ample opportunity to present evidence and legal arguments fairly. The panel also considered the objections and defenses raised by the defendants, although ultimately ruling

against them. This transparent legal process demonstrates respect for the legal rights of all parties involved.

Table 1. The Application of Justice Principles in Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. and Their Relevance to Legal Justice

Aspect of Justice	Explanation in Decision No. 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst.	Relevance to Legal Justice
Distributive Justice	Ensures that rights and economic benefits of “Urban Light” remain with the rightful owner, i.e., Chris Burden or his heirs. The court orders Defendant I & II to compensate for material and immaterial damages due to unauthorized use of “Love Light”, fairly distributing economic rights.	Fair allocation of rights and benefits to creators based on their entitlement.
Commutative Justice	Upholds equality between parties; judges confirm that defendants' unauthorized use violated exclusive rights. Defendants are required to rectify losses and halt commercial exploitation, preserving balance between creators' and users' rights without unilateral harm.	Ensures equality and reciprocal obligations between parties involved.
Procedural Justice	The trial process adheres to applicable legal procedures, giving both parties fair opportunities to present evidence. Judges transparently consider objections and defenses before ruling.	Guarantees fair, transparent, and impartial legal process, upholding rule of law.

Source: Analysis of Decision No. 31/Pdt.Sus-Copyright/2020/PN.Niaga.Jkt.Pst.

The ruling strikes a balance between the rights of creators and users. The creator’s rights, encompassing both moral and economic aspects, are fully protected by prohibiting unauthorized reproduction or imitation of works without the creator’s consent. Users, in this case, are reminded that the use of any work, particularly for commercial purposes, must be based on official permission or licensing from the rightful copyright holder. This decision serves as an essential precedent, particularly for the creative industry, reinforcing the necessity of respecting intellectual property rights. The impact of this ruling on future copyright protection in Indonesia is substantial. It affirms the judiciary's serious stance on protecting copyright, including works originating abroad, as long as they meet protection criteria under international agreements ratified by Indonesia. The ruling is expected to set an important precedent for similar cases in the future, particularly amidst the increasing trend of imitating artistic works for commercial purposes. It reinforces legal certainty for creators and copyright holders, emphasizing that copyright violations should not be trivialized. Furthermore, it is hoped that this ruling will enhance public awareness and encourage compliance among business actors regarding the importance of respecting copyright, thus fostering a fair, competitive, and sustainable creative industry environment.

Conclusion

Based on a juridical review of copyright protection in Indonesia, it can be concluded that the regulation of copyright is comprehensively and equitably established, grounded in the strong philosophical foundation of the 1945 Constitution of the Republic of Indonesia (UD NRI 1945) and concretely implemented through Law Number 28 of 2014. The copyright framework not only positions the creator as a protected legal subject but also balances the rights and obligations of all related parties, encompassing both moral and economic aspects. This protection ensures legal certainty, promotes respect for creative works, and plays a strategic role in the development of the national creative industry.

By adopting international standards, Indonesia demonstrates its commitment to safeguarding intellectual property rights in the era of globalization, thereby fostering an ecosystem that encourages innovation, creativity, and the sustainable prosperity of society. Furthermore, the analysis of Decision Number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst. concludes that the ruling reflects the judiciary's strong commitment to upholding the principles of legal justice, both distributive, commutative, and procedural, by fully protecting the moral and economic rights of the creator. The panel of judges unequivocally acknowledged the legal standing of the plaintiff as the lawful heir of the creator of "Urban Light" and determined that the defendants had violated copyright by imitating and modifying the work without proper authorization. This decision establishes a clear balance between the rights of the creator and the users and reaffirms that copyright infringement, whether through unauthorized commercialization or reproduction, is intolerable. Consequently, this ruling sets a significant precedent for future copyright protection in Indonesia while fostering greater awareness and compliance with legal norms governing intellectual property, ultimately contributing to a fairer and more competitive creative industry environment.

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