

“A Juridical Analysis of Copyright Protection in the Commercial Use of Works Without License: A Case Study of Court Decision No. 4 Pdt.Sus-HKI/Cipta/2025/PN Niaga Jkt. Pst”

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Abstract

The growth of Indonesia's creative industry has intensified the use of copyrighted works in business, but not always with proper licensing, leading to frequent infringements, including the use of artworks as promotional media. This study analyzes copyright protection for the commercial use of a work without licence under Law Number 28 of 2014 on Copyright and examines the legal reasoning of the Panel of Judges in Decision Number 4/Pdt.Sus-HKI/Cipta/2025/PN Niaga Jakarta Pusat concerning the use of the “Tugu Selamat Datang” image on PT Fast Food Indonesia Tbk (KFC) product packaging without permission from the creator's heirs. Using a normative legal method with statute, case, and conceptual approaches, this research relies on secondary data from legislation, court decisions, literature, and legal doctrine, analyzed qualitatively. The findings show that any commercial exploitation of a copyrighted work without licence constitutes a violation of the creator's or right holder's exclusive economic rights and may give rise to preventive and repressive legal measures through civil claims and criminal sanctions. The decision confirms that the redesigned “Tugu Selamat Datang” image on KFC buckets still infringes copyright and constitutes a tort because it exploits the substance of the work for economic gain, thereby imposing liability and compensation. It also underscores the importance of business compliance with copyright licensing and provides a reference for future enforcement regarding commercial use of copyrighted works.

Keywords: *Copyright, Legal Protection, License, Economic Rights, Court Decision.*

INTRODUCTION

The success of a nation is determined not only by the wealth of its natural resources, but also by its capacity to manage and develop resources that are essentially inexhaustible, namely Intellectual Property (IP). Intellectual Property is the product of human intellect that possesses sustainable economic, social, and cultural value. Therefore, the development and protection of Intellectual Property must be a primary focus of the government in realizing knowledge-based development. According to H. Ok. Saidin, Intellectual Property constitutes a proprietary right of an immaterial nature, originating from the labor of human reason and emotion that gives rise to intellectual works (Saidin, 2015). Although intangible, intellectual works have economic value because they are produced through creative processes that require time, effort, and cost. Consequently, every intellectual creation deserves legal protection to prevent unauthorized exploitation and to provide creators with the motivation to continue innovating. At the macro level, a number of empirical studies show that intellectual property rights (IPR) protection is closely linked to innovation and, under certain conditions, to economic growth, although the relationship is not always linear and may vary according to the level of development of each country (Çela, 2016). Comparative economic research summarized by WIPO also indicates that jurisdictions with stronger and more predictable IPR regimes tend to attract higher levels of technology transfer, foreign direct investment, and creative-industry development (World Intellectual Property Organization (WIPO), 2022).

Historically, the regulation of Intellectual Property Rights (IPR) in Indonesia has evolved since the colonial Dutch East Indies in the 1840s. Early regulations on IPR included trademark rules in 1885, the Patent Act in 1910, and the Copyright Act in 1912. These developments became

the foundation of Indonesia's IPR legal system, which is now comprehensively governed by Law Number 28 of 2014 on Copyright. Indonesian scholars such as Agus Sardjono emphasize that Indonesia adopts the author's right (*auteursrecht*) tradition of continental Europe rather than the purely economic copyright model of the Anglo-Saxon system, so that copyright in Indonesia inherently integrates both moral rights and economic rights of the creator (Sardjono, 2010). This view is consistent with doctrinal analyses that position copyright not only as an economic asset, but also as an extension of the creator's personality and dignity. The statute affirms that copyright is the exclusive right of the creator that arises automatically once a work is expressed in a tangible form, without requiring registration, in line with international instruments administered by the World Intellectual Property Organization (WIPO).

In Indonesia, the configuration of IPR reflects the state's commitment to a knowledge-based and creative economy. IPR is delineated into several categories such as copyright, patents, trademarks, industrial designs, trade secrets, geographical indications, and layout designs of integrated circuits (Republic of Indonesia, 2014). Recent normative legal research stresses that IPR is a crucial foundation for technological progress, cultural development and economic competitiveness, and that comprehensive legal protection is required to sustain long-term innovation and investment (Kartika et al., 2025; Ruslina, 2024). The role of IPR is especially visible in Indonesia's creative industries sector which includes design, film, music, digital content, and other cultural products where copyright protection serves as a key incentive for creators and entrepreneurs. Studies on the creative economy indicate that the shift in copyright offences from complaint-based to ordinary offences under Law No. 28 of 2014 has strengthened law enforcement and provided a firmer legal basis for combating piracy in the creative industries, although gaps remain in implementation (Ruslina, 2024). At the international level, the modern system of IPR protection is organized by WIPO and by key multilateral instruments such as the Berne Convention for the Protection of Literary and Artistic Works and the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) under the World Trade Organization (WTO), all of which Indonesia has ratified. These instruments, according to Çela, (2016), also provide a minimum standard that shapes the direction of national IP reforms in developing countries.

The fundamental principles of IPR protection encompass four core aspects: justice, economy, society, and culture. The principle of justice ensures respect for creators' moral and economic rights, whereas the economic principle emphasizes that intellectual works have commercial value and function as engines of the creative industries. The social principle underscores the need to balance individual rights with the public interest through mechanisms such as fair use and compulsory licensing, while the cultural principle ensures protection of traditional cultural expressions and local knowledge to prevent unethical exploitation. Contemporary comparative legal studies on copyright in the digital era especially in relation to digital artworks also highlight the importance of fair use/fair dealing doctrines and exceptions to copyright as instruments to maintain this balance between private rights and the wider public interest (Deniesa et al., 2023). Copyright, as a component of IPR, grants exclusive rights that arise automatically when a work is fixed in a tangible form without requiring formal registration (Republic of Indonesia, 2014). Indonesia's copyright protection system originated from the Dutch *Auteurswet* 1912, later replaced by Law Number 6 of 1982 and subsequently refined through Law Number 28 of 2014 to align with the Berne Convention and the WIPO Copyright Treaty (WCT).

Copyright consists of moral rights and economic rights; moral rights are inherent and perpetual to the creator, while economic rights provide the prerogative to obtain financial benefits from the exploitation of the work. Indonesian and comparative scholarship further notes that copyright must be responsive to rapid technological changes, particularly in the digital environment, where the ease of reproduction and dissemination increases the risk of piracy yet

also expands opportunities for creative reuse under fair use and related doctrines (Deniesa et al., 2023). In legal theory, the protection of IPR reflects law's function as an instrument to create justice, certainty, and utility (Rahardjo, 2000). Legal protection operates preventively to forestall violations and repressively to restore infringed rights (Hadjon, 1987). Recent Indonesian research on IPR enforcement shows, however, that implementation still faces serious challenges: low public awareness of IPR, inconsistent law enforcement, costly and time-consuming proceedings, and limited institutional capacity (Riswandi, 2024; Ruslina, 2024). Legal liability arises when there is a breach of a norm carrying sanctions; in line with Hans Kelsen's theory, liability arises from violations of positive legal norms regardless of the actor's moral motives (Kelsen, 1967). In the context of copyright, the use of a work without permission or a valid license constitutes an unlawful act that gives rise to civil and criminal liability (Republic of Indonesia, 2014). Normative and case-based studies on copyright infringement in the Indonesian Commercial Court also show that, although courts frequently declare infringement, the compensation awarded is often low or inconsistent, prompting calls for new procedural models such as small claims mechanisms to make remedies more effective for copyright owners (Riswandi, 2024).

Several recent case studies illustrate the practical importance of effective copyright protection. One widely discussed example is the decision of the Indonesian Commercial Court in the Rabbit Town case (Case Number 31/Pdt.Sus-Hak Cipta/2020/PN.Niaga.Jkt.Pst.), where the court found that a selfie theme park in Bandung had infringed the copyright in Chris Burden's public installation *Urban Light* (Shionoiri et al., 2021). The case underscores that commercial exploitation of artistic works without authorization can cause both economic loss and violation of moral rights, and has been cited in academic commentary as a turning point in Indonesian jurisprudence on the protection of visual artworks in public spaces. Building on this jurisprudence, legal scholarship has examined the adequacy of compensatory mechanisms and the broader implications of copyright enforcement for economic justice and the creative economy (Riswandi, 2024).

One concrete contemporary example and the focus of this research is the dispute between the heirs of the late Henk Ngantung and PT Fast Food Indonesia Tbk. KFC Indonesia, as reflected in Decision Number 4/Pdt.Sus-HKI/Cipta/2025/PN Niaga Central Jakarta. The dispute arose from the use of Henk Ngantung's "Welcome Monument" sketch in KFC's anniversary promotional design without permission from the copyright owner, despite the work having been duly registered with the Directorate General of Intellectual Property (DJKI). Such conduct inflicted economic loss and violated the creator's moral rights. From a doctrinal perspective, this case resonates with the concerns raised by Sardjono (2010) and Saidin (2015) regarding the weak internalization of IP-awareness among business actors and the tendency to treat cultural and iconic imagery as if it were part of the public domain. Against this background, an in-depth juridical analysis is required concerning the mechanisms of legal protection for copyright against the commercial use of works without licenses and the judicial reasoning of the panel of judges in adjudicating the dispute. Accordingly, this study is entitled: "A Juridical Study of Copyright Protection Against the Commercial Use of a Work Without a License (Pengadilan Niaga pada Pengadilan Negeri Jakarta Pusat, 2025)."

RESEARCH METHODS

This research employs a normative juridical method with a statute approach. The normative juridical method regards law as a set of binding norms that function to regulate social life (Ishaq, 2017). The statute approach is used to examine all relevant legal instruments, including statutes and court decisions, in order to understand the legal framework governing copyright protection against commercial use without a license (Marzuki, 2011). The subjects of

this study comprise legislation and judicial decisions related to copyright, with Decision Number 4/Pdt.Sus-HKI/Cipta/2025/PN Niaga Central Jakarta serving as the principal case study. The research materials consist of primary legal materials (Republic of Indonesia, 2014), secondary legal materials (books, scholarly journals, academic articles, and opinions of legal experts), and tertiary materials (law dictionaries, encyclopedias, and media publications that provide supplementary explanations to the other legal materials). Data collection is conducted through library research by tracing, identifying, and reviewing relevant written legal sources. The data obtained are then classified based on their relevance to the research focus. Subsequently, the data are analyzed using normative qualitative analysis, namely by interpreting primary, secondary, and tertiary legal materials in light of legal theory, legal principles, and scholarly doctrine (Soekanto, 2006).

The analytical model employed is descriptive-analytical, aiming to portray legal facts and to assess the congruence between positive legal norms and their practical application in court decisions. This research does not utilize statistical models, as it is oriented toward legal reasoning and normative interpretation. The study is conducted in Central Jakarta, considering that this area is the center of legal institutions and intellectual property administration in Indonesia, including the Directorate General of Intellectual Property (DJKI) and the Central Jakarta Commercial Court, both of which are relevant to the object of the research.

RESULT AND DISCUSSION

Pengadilan Niaga pada Pengadilan Negeri Jakarta Pusat (2025) Case Number 4/Pdt.Sus-HKI/Cipta/2025/PN Niaga Central Jakarta illustrates how copyright law instruments operate when a visual element deeply rooted in the collective memory the sketch of the “Welcome Monument” by the late Henk Ngantung is deployed as a device of commercialization without a license in a nationwide campaign. Normatively, the status of the work is unquestionable: protection arises automatically upon fixation (the declarative principle) in line with the general philosophy of the Copyright Law and the Berne regime, while administrative evidence in the form of Copyright Certificate No. 46190 and three DJKI registration letters of rights assignment in 2019 confirm the heirs’ standing as lawful right holders. Factually, exhibits P-39 through P-43 corresponding to T-6 show the use of the sketch elements on KFC’s 2022 anniversary bucket distributed widely; the absence of any license from the right holder and the implicit acknowledgment of the silhouette’s presence in the Defendant’s answer cement the element of factual use. Accordingly, the Panel found infringement of economic rights under Article 9 of the Copyright Law and a violation of moral rights due to the lack of adequate attribution to the original creator. From this first strand of analysis, the discussion yields a clear result: both the normative and evidentiary structure of the case strongly support the conclusion that the heirs validly hold copyright and that KFC’s nationwide campaign constitutes unauthorized commercial exploitation of that right.

Certainty as to the subject and object of rights functions as the foundation of proof. Examination of P-27 to P-38 shows that the sketch was created in 1962 and is therefore protected in the category of fine art under Article 40 letter f of the Copyright Law, with a term of protection lasting for the life of the author plus 70 years, calculated from January 1 of the following year; with Henk Ngantung’s passing on December 12, 1991, protection continues at least until 2062. This clarity is reinforced by previous decisions concerning the same object, at both the Commercial Court and Supreme Court levels, which affirm the status of the author and right holder; while such decisions are not formally binding on third parties, they carry strong persuasive authority and, sociologically, should have a preventive role. The discussion thus produces a second important result: there is no normative uncertainty about either the subsistence

of copyright or the identity of the right holder, so recurrent disputes over the same work must be traced not to legal ambiguity but to persistent failures of compliance in practice. The fact that disputes keep recurring indicates that the main problem is not the structure of the law but rather weak internalization of IP compliance obligations across the design, advertising, and marketing value chain.

The element of commercial use without authorization is significant not only because of profit-seeking motives, but also because the manner of use positions the protected expression as a visual identity marker of the campaign. This reasoning accords with the structure of Article 9(1) of the Copyright Law, which grants the right holder exclusive control over acts of reproduction, communication to the public, distribution or rental, and any form of use for commercial purposes; each exercise of economic rights must obtain permission (paragraph (2)) and is prohibited if done without authorization (paragraph (3)). The defense narrative that the image was created by a third party and is “original” as a multi-element composition does not negate the licensing requirement where the protected portion remains recognizable and functions as a pillar of commercialization. Thus, the issue of composite originality is irrelevant to absolve the end user of responsibility; the legal relationship with the third party creator including contractual warranties of non-infringement lies in a different domain and does not sever the causal link with the injured right holder. The result of this discussion is that corporate users cannot shelter behind creative intermediaries: whenever a recognizable copyrighted element is used as a core commercial signifier, the obligation to secure a license remains squarely with the exploiting company.

The rejection of the error in persona objection clarifies the structure of liability in IP infringement: the party engaging in exploitative-commercial conduct in the marketplace is the proper defendant because it enjoys the direct economic benefit and controls the decision to use. A corporation’s duty of care to ensure lawful exploitation through IP due diligence covering provenance checks, verification of the chain of title, licensing clearance, and attribution documentation cannot simply be delegated to a third party. The framework of Article 1365 of the Civil Code provides a reliable civil foundation: fault need not be proven as malice; negligence in securing permission and ignoring a cease-and-desist is sufficient to establish liability. This construction aligns with Article 1367 of the Civil Code on responsibility for acts of others within a sphere of supervision, so the argument that “a third party drew it” is ineffective to extinguish the commercial user’s liability. Consequently, the discussion confirms a third doctrinal result: in copyright disputes involving corporate campaigns, the commercial exploiter rather than its contractors remains the primary bearer of civil liability under Articles 1365 and 1367 of the Civil Code.

The Panel’s calculation of material damages a license royalty of 3% of estimated national turnover is notable because it signals a shift in proof practice toward a transparent, measurable, and auditable model. The formula used (number of outlets multiplied by average sales per outlet, multiplied by sales duration, multiplied by unit price, all then multiplied by 3%) embodies the principle of the “lost license price” familiar in licensing economics. Operational parameters that went undisputed by the Defendant strengthen the model’s precision, while the conservative royalty percentage avoids over-compensation. As a result, the discussion on damages shows that Indonesian courts are capable of applying economically rational and replicable models to quantify copyright losses, which can serve as a template for future litigation. A methodological takeaway, however, is the importance of preparing credible comparator scenarios for instance, an account-of-profits approach to estimate margins causally attributable to the protected element; a hypothetical negotiation approach to reconstruct the ex ante license price considering duration, exclusivity, and reach; and, where appropriate, a limited disgorgement targeting the portion of profits reasonably associated with the protected use. The availability of multiple models is not to

inflate figures, but to furnish a richer evidentiary landscape so the judge has a stronger evaluative anchor.

The refusal to award non-material damages underscores that equating moral-rights violations with monetary compensation remains subject to the discipline of civil proof. Substantively, the infringement of moral rights especially the right of attribution is recognized, but converting it into compensable figures requires measurement tools beyond generalized reputational harm. In practice, plaintiffs can build an evidentiary bridge through independent expert appraisal of the creation's reputational value, quantifiable public-sentiment metrics, or indicators of "lost attribution" affecting the economic value of the work and the creator's family brand. Without such apparatus, non-material claims remain vulnerable to rejection, even when moral-rights infringement is normatively acknowledged. Thus, the discussion produces another concrete result: future plaintiffs must support non-material claims with verifiable indicators of reputational and moral harm if they wish to secure compensation for moral-rights violations. In other words, this case encourages strengthening methodologies for non-material proof consistent with the principle of verifiability.

The petition for *dwangsom* was properly denied on doctrinal grounds. In Indonesian civil procedure, *dwangsom* functions as psychological pressure to compel compliance with an order to do or refrain from doing something; it is not a coercive tool for the payment of money. For monetary awards, real-execution mechanisms already exist, so applying *dwangsom* here would not only be unnecessary but could blur functional boundaries among enforcement instruments. This clarity preserves the purity of execution procedures and prevents disproportionate expansion of civil coercion devices. Accordingly, the discussion confirms that the limits of *dwangsom* in Indonesian law must be maintained to avoid transforming it into a general instrument of debt collection. From a legal-theory vantage point, the decision harmonizes four values often used as evaluative compasses: certainty, justice, utility, and protection. Certainty is evident in the affirmation of authorship, ownership, and the protection term; corrective justice is realized through restoration of economic benefits equivalent to royalties; utility is present because the orders do not exceed the evidence, particularly as to non-material damages and *dwangsom*; and protection is not merely private but symbolic, affirming that works functioning as city icons and cultural memory remain subject to licensing when monetized. More broadly, this case spurs corporate practice reform: IP-compliance SOPs must be integral to governance; non-infringement warranties and indemnities must be sharpened in creative contracts; and compliance audits should be designed from the campaign-planning stage, not post-production.

At the policy level, replication of disputes over the same object indicates that sanctions and judgments alone do not suffice to change behavior. What is needed are preventive strategies that reduce compliance costs and information asymmetry. Regulators and industry associations can promote sectoral guidelines on royalty ranges for visual licenses in retail and F&B campaigns, standardize simple license-agreement templates usable by MSMEs and corporations, and integrate IP modules into creative and marketing training curricula. This is not mere education, but institutional engineering that makes compliance the cheapest and most certain practical choice. The policy-oriented result of this discussion is that sustainable copyright protection requires structural incentives and user-friendly mechanisms, not merely punitive judgments.

At the doctrinal level, this case clarifies the boundary between permitted uses and those requiring licenses. Non-commercial uses for education, research, or news reporting may fall within exceptions, but once a protected work is used as a promotional device to drive sales, its economic dimension predominates and exceptions cannot be used as a blanket shield. This reasoning minimizes opportunities to smuggle in a "new work" concept to bypass authorization when the protected expression remains recognizable. Here lies the significance of the case at hand: it signals that creative transformation must rest on the foundation of proper licensing, not

on exploiting doctrinal ambiguity to rationalize unauthorized use. In doctrinal terms, the discussion result can be stated clearly: transformative use is not a substitute for licensing where the original expression continues to be identifiable and serves a commercial function.

All elements of an unlawful act in the context of copyright infringement are cumulatively satisfied. There is conduct contrary to the Copyright Law in the form of commercial use of protected sketch elements without permission; there is at least negligence by the corporation in verifying permissions and in substantively responding to the cease-and-desist; there is economic loss calculable through a license-royalty model; and there is a direct causal link between unauthorized use and the right holder's lost economic benefit. The award of material damages anchored to a 3% royalty yielding IDR 2,831,400,000 demonstrates a proportional and replicable correction; at the same time, the rejection of non-material damages and *dwangsom* reflects fidelity to evidentiary principles and to the proper functions of civil-execution instruments. Summarizing the overall discussion, the results can be framed as follows: (1) the case consolidates doctrinal clarity on authorship, ownership, and the scope of economic and moral rights; (2) it affirms corporate liability for unauthorized commercial exploitation despite reliance on third-party designers; (3) it showcases a workable model for calculating material damages based on lost-license royalties; and (4) it highlights the need for more rigorous evidentiary standards for non-material damages and for strengthening *ex ante* IP compliance mechanisms in corporate practice.

CONCLUSION

Under Law Number 28 of 2014 on Copyright, economic rights are part of the exclusive rights granted to authors or copyright holders to obtain economic benefits from their works. The exercise of these economic rights is carried out through licensing, namely an official authorization that allows other parties to use the work while respecting the author's rights and interests. Any form of commercial exploitation of a work without a license constitutes an infringement of the copyright holder's economic rights. The statute provides legal protection through civil and criminal sanctions to ensure respect for copyright and to prevent unauthorized economic exploitation. Accordingly, the copyright protection system not only safeguards the personal interests of creators but also fosters a fair and healthy climate for creative economic activity in Indonesia.

After examining and assessing copyright infringement from a juridical perspective in Decision Number 4/Pdt.Sus-HKI/Cipta/2025/PN Niaga Central Jakarta, the Panel of Judges found that the Plaintiff was proven to be the lawful copyright holder of the "Welcome Monument" image based on the copyright certificate and rights-assignment letters, thereby possessing legal standing to sue. In this case, KFC (in *casu*, the Defendant) was proven to have committed copyright infringement, as the silhouette of the "Welcome Monument" was used on its anniversary (43rd) product packaging bucket without authorization and license, clearly resulting in a violation of the Plaintiff's economic rights as the copyright holder. Consequently, the Panel granted material damages based on a calculation of the economic benefit obtained by the Defendant. Although the proceedings revealed as a matter of fact that the design on the packaging bucket was created and drawn by a third party, namely Alnurul Gheulia, the Judge, in the court's reasoning, emphasized that legal responsibility remains with KFC Indonesia as the party that used the work for commercial purposes.

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