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Perbandingan Hukum Penjaminan Benda Bergerak Gadai Dan Jaminan Fidusia Di Indonesia Dengan Possessory Dan Non-Possessory Pledge Di Belanda Dan Prancis = Comparative Study of Security Rights Over Movable Assets: Pledge And Fiduciary Security In Indonesia Versus Possessory And Non-Possessory Pledge In The Netherlands And France

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