

Indirect Contributions of the Wife in the Distribution of Matrimonial Assets

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Abstract

Indirect contributions represent a critical criterion the Malaysian Sharia Court considers in determining the distribution of matrimonial asset claims. Legally, contributions of this nature usually favour the wife compared to the husband. This article discusses the extent and types of indirect contributions made by the wife in matrimonial assets which influence the share obtained by the wife in cases brought before the Sharia Court in Malaysia. A case study method was used in this study, which focused on legal decisions reported in the law journal and unreported cases. The study found that the Sharia Court has several approaches to determining the extent and types of indirect contributions which ultimately influence the proportion of the share obtained by the wife. According to the preliminary results of this study, indirect contributions are not clearly defined in the legal provisions, and there is no specific method of determining the extent of indirect contributions used by Sharia courts.

Keywords: Matrimonial Assets, Indirect Contributions, Shariah Court, Islamic Family Law

Introduction

Matrimonial assets constitute a fundamental aspect of family law in Malaysia, particularly under the framework of Islamic jurisprudence that governs Muslim family affairs. These assets, generally defined as properties acquired by spouses during the subsistence of a legally recognised marriage, carry profound implications for justice, gender equity, and social harmony. The concept also extends to assets owned by a spouse prior to marriage but subsequently nurtured, improved, or developed during the marital relationship. In Malaysia, matrimonial assets are codified and uniquely practised within the Malay Archipelago, reflecting both cultural heritage and the influence of Shariah law.

The study of matrimonial assets is of significant importance because it deals directly with the distribution of wealth, rights, and responsibilities within the family institution, the cornerstone of society. The recognition of both direct and indirect contributions in determining the division of matrimonial property is essential to ensure fairness between spouses. Direct contributions, such as monetary investments or property acquisition, are relatively straightforward to prove; however, indirect contributions, such as homemaking, childcare, and emotional support, are more complex yet equally vital. The Shariah Court has acknowledged the value of indirect contributions, often linked to the role of wives, thereby underscoring the need for a nuanced and equitable approach in adjudication.

Despite its importance, the current statutory framework lacks explicit provisions detailing how such contributions should be assessed. This legal gap has led to inconsistencies in judicial reasoning and outcomes, creating uncertainty for litigants and challenges for judges. The absence of clear guidelines compels parties to rely on varied interpretations and evidence, sometimes resulting in outcomes that fail to fully reflect the spirit of justice intended by Islamic law. Consequently, this area requires deeper academic scrutiny and legal reform to strengthen the protection of spouses' rights and enhance the credibility of Shariah Courts.

The significance of this study lies in its potential to address both theoretical and practical dimensions of matrimonial asset disputes. From a legal perspective, it contributes to the development of Islamic family law in Malaysia by identifying gaps and proposing reforms that align with *maqasid al-shariah* (objectives of Islamic law), particularly in upholding justice and protecting the vulnerable. From a societal perspective, the study benefits spouses especially women who often rely on the recognition of indirect contributions to secure a fair share of matrimonial property. Furthermore, judges, legal practitioners, and policymakers stand to gain clearer insights and workable recommendations that can improve consistency, fairness, and efficiency in the adjudication process.

In light of these considerations, this study does not merely address a technical legal issue; it examines a matter central to the well-being of families and, by extension, the moral and social fabric of Malaysian society. By focusing on the evaluation of indirect contributions in matrimonial asset disputes, the research aims to advance a more just, balanced, and contextually relevant legal framework that upholds both the principles of Islamic jurisprudence and the evolving realities of contemporary family life.

Matrimonial Assets in Islamic Family Law

The assessment of matrimonial assets commences from the first day a couple is married. All assets acquired during this time until divorce is considered to have fulfilled their intended purpose from a legal standpoint. Matrimonial assets are acquired or generated during a husband's and wife's marriage through combined resources or efforts (Abdullah 2014). These assets can be in two primary forms: movable assets such as vehicles, savings, stocks, etc., or immovable assets like land, houses, buildings, etc. Matrimonial assets are generally considered any movable or immovable assets jointly acquired by the husband and wife through collective efforts and contributions. At the same time, their marriage is still valid and in effect (Kamarudin & Halim 2009).

The law on matrimonial assets in Malaysia is not static but evolves according to circumstances and times. Consequently, matrimonial assets have been expanded to include any assets acquired before marriage but accumulated or developed during marriage. It is also considered matrimonial assets whether they have been collected individually or with the spouse's assistance (Sitiris & Halim 2010). However, inheritance is not considered as matrimonial assets (Hassan, 2021). Nonetheless, inherited assets can be considered matrimonial assets if there have been any additions to these assets during marriage, whether in the form of construction, renovation, or otherwise. For instance, if one party constructs a house on inherited land during the marriage, that house is considered a matrimonial asset.

Contribution is a critical element of matrimonial assets. Two types of contributions can be considered: direct and indirect contributions. Legal recognition of direct contributions can be seen in section 122 of the Islamic Family Law Act/Enactments in all states of Malaysia as stated:

(1) The court shall have power, when permitting the pronouncement of talaq or when making an order of divorce, to order the division between the parties of any assets acquired by them during their marriage by their joint efforts or the sale of any such assets and the division between the parties of the proceeds of sale.

The law also establishes that one party may receive a larger share due to significant contributions. In the case of *Mazhatulshima binti Mohd Zahid vs Kamardin bin Zainal Abidin* (2018) JH 47(2) (253), the Sharia Court of Appeals allowed the Appellant's appeal after proving that the contributions made by the Appellant were more significant than the respondent. *Hamzah Awi vs Madini Fajariah Bujang* (2016) JH 42(2) 231 also demonstrates that the Sharia Court grants a more significant share to the party, making more contributions if successfully proven during the trial.

Direct contributions recognised by the Sharia court include financial and labour contributions, either individually or shared, also known as the joint contributions of both parties (Jusoh 2019). Direct contributions refer to financial and labour contributions to acquire assets during the marriage (Jusoh 2016). For example, a husband and wife both spend money to purchase, pay instalments, and pay for renovations on the acquired property. Meanwhile, direct labour contributions involve both parties working hard to cultivate a field if the asset is agricultural land, jointly building a house or building, and together maintaining it. This can be seen in the case of *Mansjur vs Kamariah Nordin* (1988) JH 4 (2) 34. Labour efforts were recognised in this case, indicating that such efforts have legal recognition. Labour contributions exist when parties jointly exert efforts and energy in developing land into assets (Tapah 2003). This situation is considered as both parties jointly contributing capital and effort (Asri, 2001). If one party makes greater direct contributions than the other, they will receive a larger share as stipulated in section 122(4) of the Islamic Family Law Act/Enactments of the States.

The Sharia Court defines indirect contributions as moral support, assistance with household chores, managing children, providing meals for the family, and connecting to the spouse's family, which can assist in career advancement (Jusoh 2019). Indirect contributions generally revolve around tasks performed by the spouse in their daily life, including duties as

a homemaker, contribution of ideas, encouragement, and comfort enjoyed by them, enabling the spouse to work and accumulate wealth (Jusoh 2016). Moreover, the wife's influence, status, and standard of living also entitle her to rights based on indirect contributions (Ibrahim 2007).

It is argued that Section 122(4)(a) is a legal provision recognising indirect contributions. However, the text of the related provision does not explicitly mention indirect contributions as stated:

(4) In exercising the power conferred by subsection (3), the court shall have regard to - (a) the extent of the contributions made by the party who did not acquire the assets, to the welfare of the family by looking after the home or caring for the family;

The recognition of Sharia courts for indirect contributions can be seen in many cases that have been decided, such as in the case of *Tengku Anum Zaharah vs Dato' Dr Hussein* (1983) JH 3(1) 125, *Sharifah Badariah binti Mari vs Yasran bin Haji Hussain* (2020) JH 50 (1) 52, *Rehanah bt. Mohd Dom vs Zainal Abidin b. Yusof & another* (2020) JH 36 (1) 80. The aforementioned cases have demonstrated that all the plaintiffs successfully established ownership of the assets acquired during the marriage. The source of the finances is attributed to the defendant, given that all the plaintiffs served as homemakers.

Consequently, the Sharia Court has recognised the role and responsibilities undertaken by the wife as a homemaker, which in turn fulfils the obligations of the working husband. The husband would not be able to perform his duties effectively if he was not supported and sacrificed for by his wife. The contributions made by the wife are seen as indirect, yet they are taken into account by the Sharia Court as a determining factor in the division of matrimonial assets. Non-financial contributions of a wife are considered indirect contributions, which primarily refer to her household responsibilities.

Meaning of Indirect Contribution

Indirect contribution can be interpreted as an individual who does not provide financial and physical contributions toward the acquisition of wealth, such as a non-working wife who performs household duties, qualifying her to claim matrimonial assets as a form of recognition for taking on the responsibilities that should have been performed by her husband (Latiff 2004). It also encompasses contributing ideas, encouragement, and comfort to the husband, enabling him to work and accumulate wealth (Jusoh 2016). The case of *Ramli Baba vs Wan Zainun Wan Abdullah* (2015) JH 40(2) 211 can be used as a benchmark where the Putrajaya Sharia Court of Appeal referred to the judgment in the case *Noor Bee vs Ahmad Sanusi* (1401H) JH (2) 63, stating:

"...matrimonial assets are permitted by Sharia based on service and shared life. The wife manages and controls the household, while the husband goes out to earn a living. According to Sharia, the wife has the right to have domestic help in managing the household; if not, cooking, cleaning, and household management should be considered as part of the work that reduces the husband's burden."

The wife's social status and influence are also recognised by the Sharia court as forms of indirect contributions. A wife of social standing and status provides a privilege to the husband to succeed in business affairs, thereby gaining a high position, business success, and so on. This is also considered when determining the share of matrimonial assets. In the case of *Tengku Anum Zaharah vs Dato' Dr Hussein* (1980) JH 3 (1) 125, even though the plaintiff did not provide any financial contribution, the plaintiff's status coming from a royal family allowed the defendant to be awarded with the title 'Dato' and achieve various successes in a business venture. The court considered this an indirect contribution by the plaintiff, qualifying her for matrimonial assets.

The indirect contributions of a wife within marriage are not uniform. Four categorisations can be made regarding these contributions, namely (1) full-time homemaker without the aid of domestic help, (2) full-time homemaker with the aid of domestic help, (3) career wife, homemaker without the aid of domestic help, and (4) career wife, homemaker with the aid of domestic help. Hassan (2021) expanded on the indirect contributions of a wife beyond the above four criteria by adding obedience, encouragement, morale, the wife's influence, and providing a peaceful environment for the husband as determining factors of a wife's indirect contributions.

Court Decisions in Cases Involving Indirect Contributions

The law has allowed for claims to matrimonial assets due to divorce, death, and polygamy, whether these assets are immovable such as land, houses, buildings, etc., or movable assets in the form of vehicles, modern assets like stocks, bonds, sukuk, etc. The three types of matrimonial asset claims are pursued in the Sharia Court, each utilising distinct legal provisions. For instance, claims arising from divorce, whether it be a mutually agreed divorce, divorce by hakim, *taklik* (conditional stipulation), or *fasakh* (annulment), can be made under Section 122 of the Islamic Family Law of the respective states. Claims arising from polygamy with the permission of the Sharia Court are made in accordance with Section 23 of the Islamic Family Law of the respective states. Claims for matrimonial assets due to death adhere to the Practice Directive (Arahan Amalan) No. 5 of 2003 by JKSM, which states that such claims can be made during divorce proceedings, post-divorce, or post-death. Despite leveraging different provisions, the method of proof remains consistent with what is outlined in the procedural statutes of the Sharia Court and the evidence statutes of the Sharia Court. Emphasis is placed on all parties adhering strictly to all procedural and evidentiary rules to enable the Sharia Court to determine each party's rights in the most just manner.

In claims for matrimonial assets involving immovable property due to divorce, as in the case of *Yahazizanamini binti Mat Yasir vs Md. Zaidi bin Ismail* (Summons No: 10100-017-0630-2017), decided by the Shah Alam High Sharia Court on September 21, 2022, the couple only lived in the house as husband and wife for a year and a half. The plaintiff resided in the house for several years while the defendant paid the monthly house instalments even after the divorce. The plaintiff claimed 80% of the property. Still, the court awarded only 33.65% to the plaintiff considering her indirect contributions, and the defendant received 66.35% considering his direct contributions to the property, considering contributions made after the divorce. Similarly, in the case of *Noorizan Hassan vs Sufri Md Zin* (Summons No.10100-017-0095-2013), the Shah Alam High Sharia Court on December 1, 2016, ordered that the wife

receive half of a luxury bungalow despite her being a full-time homemaker who managed all household chores with the aid of domestic help, enabling her husband to succeed in business.

On the other hand, legal recognition of indirect contributions due to death can be seen in the case of *Wan Nur Sharlinie bt Wan Mohd Rosli vs Siti Fatimah bt Awang and four others* (Summons No: 03200-017-0278-2018). The plaintiff is the deceased's wife, while the defendants are the mother-in-law and the deceased's siblings, who are legitimate heirs according to Islamic jurisprudence. The plaintiff and her husband maintained a long-distance marital relationship, meeting primarily on weekends or holidays. Following her husband's death and the existence of several movable and immovable assets belonging to him, the plaintiff claimed a share of matrimonial assets before the assets were distributed according to Islamic inheritance laws. The Kota Bharu Sharia High Court presiding judge awarded the plaintiff only a 1/6 share in a house in Jitra, Kedah, based on her indirect contribution as a wife. The court dismissed other claims. This decision considered the fact that the house was acquired during their marriage. The decision seems reasonable, considering the plaintiff's long-distance marital status and limited time in the marital home, returning only on weekends or holidays. Nevertheless, the case is still under appeal as the plaintiff is dissatisfied with the judgment.

For polygamous couples, claims for matrimonial assets will also be decided based on the indirect contribution of a party who did not acquire the asset directly. In the case of *Kamal Azman binti Yaakub vs Nor Suhaila bin Muhamed Ali* (Case No: 10200-017-0498-2016) at the Sharia High Court in Shah Alam, the Sharia Judge Salehan bin Yatim awarded the defendant a 20% share in a house in Kajang, Selangor. This was based on the defendant's indirect contribution during the marriage, emphasising that indirect contributions involve core duties, such as a wife's devotion to managing the household and supporting her husband's professional success. This claim ensued after a polygamy order previously issued by the Sharia High Court when the defendant decided to divorce following several years of polygamous living. After the divorce, the parties claimed a division of matrimonial assets. For polygamous couples who have received permission from the court, the resolution of matrimonial asset claims proceeds in two stages. Initially, when the Sharia Court grants permission for polygamy, the assets acquired during the marriage are only ordered as matrimonial assets without a determined division among the parties. The Sharia Court decides these assets' division only when the parties divorce and claims are made through separate proceedings.

Indirect contributions are not limited solely to immovable assets but encompass all movable assets, including modern assets like stocks, bonds, etc. The evolution of such modern assets indirectly broadens the scope of matrimonial asset claims in the Sharia Court. However, proving such contributions is highly subjective and relies heavily on the duration of the marriage and the sacrifices made. In the case of *Noorizan Hassan vs Sufri Md Zin* (Case No.10100-017-0095-2013), the plaintiff was awarded 10% of the defendant's stocks listed on the Kuala Lumpur Stock Exchange. The Sharia High Court in Shah Alam recognised the indirect contributions made by the wife throughout their marriage.

Movable assets in the form of National Trust Funds, Bumiputra Trust Funds, and Tabung Haji are also considered matrimonial assets. The case of *Sharifah Badariah binti Mari vs Yasran bin Haji Hussain* (2020) JH 51(1) (33) demonstrated the court's authority to order such

based on indirect contributions. In this case, the court recognised all the money in the mentioned accounts during the marriage as matrimonial assets and can be ordered based on indirect contributions. Similarly, in the case of *Norhayati binti Yusoff vs Ahmad Tabrani* (2008) JH 27(1) 49, the Sharia High Court in Kota Bharu awarded the plaintiff 20% of the defendant's Employee Provident Fund savings. This was based on her indirect contributions as a homemaker throughout their marriage, and these savings were accumulated during their union.

Questions arise about how shares owned by the former husband are considered matrimonial assets guided by indirect contributions, especially when the former wife was not directly involved. For instance, in cases where the husband solely managed stock affairs, such as company shares or trust-form shares, where does the wife's indirect contribution come into play? This differs from indirect contributions, where the wife manages household chores, rental properties, farms, and so forth, where clear tasks are performed. Regardless, the Sharia Court focuses on the marital status and whether these shares were acquired during the marriage, justifying the division of such assets.

Proving the Extent of Indirect Contributions

Proving indirect contributions differs from proving direct contributions, as establishing direct contributions requires documentary evidence and witnesses. However, the involvement in establishing indirect contributions is only evidenced by the parties' acknowledgements and witness testimony. These contributions are proven with circumstantial evidence as provided for in sections 6 to 16 of the Sharia Court Evidence Statute (Noor 2007; Mudaran & Kusrin 2016). This circumstantial evidence is straightforward to tender and establish. It only requires the parties' acknowledgements and the testimonies of witnesses who have seen and observed the activities such as house cleaning, cooking, childcare, etc. Since women in traditional societies such as Malaysia perform these kinds of activities, it has set a very low threshold of proof that can be used in court. It is highly unlikely that a wife would not ever engage in such activities during her marriage.

Indirect contributions are sufficiently established by the husband's acknowledgement, even if the wife fails to prove them. This can be seen in the case of *Adli bin Abdullah vs Fara Emiza binti Mohamed Shah* (Summons no: 10300-017-0227-2011), where the presiding judge of the Shah Alam High Sharia Court stated: "... therefore there is no issue of the respondent's failure to prove the claim as there is acknowledgement and admission by the Appellant in the said issue...". Throughout the marriage, the husband acknowledges that the wife handled household chores, cared for the children, and prepared meals for the family. This can be seen in the appeal case between *A. Rahman bin Ismail vs Norhayati binti Mamat* (2016) JH 42(1) 21, where the Sharia Court of Appeal judges observed the appellant's acknowledgement of the respondent's role in taking care of the residence and all household affairs throughout the marriage. With the acknowledgement made by the appellant himself, the Sharia Court of Appeal dismissed the appellant's appeal to change the decision of the High Sharia Court previously.

In the case of *Hamzah Awi vs Madini Fajariah Bujang* (2016) JH 42(2) 231, the Kuching Sharia Court of Appeal ordered the respondent to receive 1/3 share based on the indirect contributions made by the respondent throughout the marriage, even though the respondent

was not aware of the existence of the shares during the marriage. The appeal panel judges stated, "...the respondent did not have any monetary contributions and was found to be unaware that the appellant had investments in ASNB until the respondent received an ASNB statement in the appellant's name at the respondent's parents' address." However, in another case, the Sharia court took a different approach. In the case of *Faridah binti Sulaiman vs Mohd Noh bin Othman* (2011) JH 32(1)(13), the trial judge rejected a matrimonial property claim in the form of Unit Trust shares and ASM MARA Unit Trust owned by the defendant because the plaintiff did not provide any evidence regarding her contributions to these shares even though the shares were known to the plaintiff.

Similarly, recognition of indirect contributions was granted by the Sharia Court in the case of *Sharifah Badariah binti Mari vs Yasran bin Haji Hussain* (2020) JH 51(1)(33). Although the plaintiff failed to prove her claim regarding direct monetary contributions to the purchase of property in Langkawi, the court recognised the role of a wife in household chores, supervision, and childcare, which allowed the husband to work peacefully outside the home. With these indirect contributions, the court ordered the plaintiff to receive 5% of the property. This amount was considered appropriate given the ownership period of only 12 years and that the property was not a matrimonial home but was used as a rental property.

Although the provision for the division of indirect contributions is quite general, usually, the highest rate for indirect contributions is only up to 1/3 of the share. This can be seen in the case of *Zailan bin Abas and three others vs Zaiton binti Abdullah* (2006) JH XXX(II)(277), where the appeal panel of the Terengganu Sharia Court of Appeal stated that it is not appropriate for the wife's indirect contributions to allow her to receive 1/2 share and serving and taking care of children and living together only entitles her to 1/3 of the deceased's property as joint property.

However, that decision is not binding on other Sharia Courts. There are also decisions where indirect contributions receive 1/2 share, such as in the case of *Noorizan Hassan vs Sufri Md Zin* (Summons No.10100-017-0095-2013). In the case of *Mohd Anuar bin Omar vs Norafidah binti Ibrahim* (2015) JH 41(2) (200), the Sharia Court of Appeal recognised the respondent's indirect contributions throughout the marriage, even though the respondent did not make any direct contributions in the form of financial or effort towards the properties acquired during the marriage but still received 1/2 share. The Sharia Court of Appeal stated:

"The plaintiff's duties for six years as a part-time housewife while working at an insurance company and 17 years as a full-time housewife have greatly assisted the defendant in acquiring these properties. This is because, during that period, the plaintiff took good care of the household, including the defendant's food, clothing, and raising their children, making the defendant feel at ease and successfully acquiring the properties."

There are differences in these decisions because of different circumstances; for instance, a homemaker who does not work will have a background that the court should examine in depth. The court also looks and differentiates between the circumstances of a wife who has a high level of education up to the university level and has worked but is willing to quit work to take care of the household and children full-time compared to a wife with low qualifications who performs the same duties (Sitiris & Halim 2010). The circumstances of a wife who has

never been declared *nusyuz* (disobedience) throughout the marriage are also considered in making decisions. Although *nusyuz* does not negate the claim, the act can reduce the division received.

In summary, recognising indirect contributions in matrimonial disputes in the Sharia Court considers various factors, including the role played by the wife in the household and in taking care of children. Circumstantial evidence and acknowledgements from the parties involved are vital in establishing indirect contributions. Court decisions may vary, with indirect contributions sometimes awarded up to 1/3 or even 1/2 of the property in question, depending on the case's specifics, contributions, and the wife's background. The court exercises discretion based on the particulars of each case and the nature of contributions made during the marriage.

Court's Approach in Determining Indirect Contribution Distribution

Given the absence of clear guidelines in the statutes applied in Sharia Courts to ascertain the method and manner of division based on indirect contributions, these courts have employed various approaches to facilitate a fair resolution for both parties. Based on the cases previously mentioned, several approaches have been adopted, which include:

Duration of the Marriage

The length of the marital union plays a pivotal role in determining indirect contributions. A prolonged marriage accentuates the recognition of these contributions. For instance, consider a wife dedicated over 25 years to full-time homemaking with their children successfully advancing to tertiary education, only for a sudden divorce to ensue. At such an age, her capacity to work, generate income, and secure housing becomes significantly challenging. Consequently, the Sharia Court's methodology gives weight to the marriage's duration as a pertinent approach for distribution based on indirect contributions. A longer marital span results in a more significant asset division for the involved parties, as exemplified in the decision of *Noorizan Hassan vs Sufri Md Zin* (Case No.10100-017-0095-2013).

Sacrifice and Service

A non-working wife, especially one with qualifications like a degree, makes immense sacrifices for the household. This commitment reflects a willing dedication or a mutual agreement to household responsibilities. Although such contributions are challenging to quantify, given their subjective nature, the Sharia Court analogously assesses them against the salary of a domestic helper, which can be thousands of Malaysian ringgit per month. This approach, combined with the previously mentioned marriage duration, facilitates asset distribution.

These two aspects are evident in the Appeal Panel's decision of *Isa bin Abd Rahman vs Fatimah @Yong binti Mohamad* (1426H) JH XX(I) 67. Before concluding, the court outlined several considerations, such as determining if the acquired assets resulted from both parties' efforts, whether the contribution was a direct collaborative effort or an indirect one wherein the wife managed the household, and if both contributed, what the appropriate division rate should be. The court's methodology in addressing these matters acknowledges the sacrifices made throughout the marital period. Managing household affairs is not a trivial task. Navigating children's needs, emotional stress, and sometimes health challenges can be

daunting. Decades of dedication to homemaking rightfully deserve acknowledgement in the event of divorce.

Conclusion

Although direct contributions grant substantial rights to the parties involved, indirect contributions are also legally recognised to grant rights to parties that do not make direct contributions. The provisions of the law are somewhat general, leading to different decisions. The text of the law only mentions 'parties that did not acquire assets' without mentioning gender or status as either a wife or husband. This raises questions, especially in the context of socio-economic changes in society, where families are headed by women and wives who the sole breadwinners are. Does the 'party' in section 122(4)(a) only focus on the wife? Such questions are relevant for thorough discussion in future research. Today, the decisions of the Sharia Court seem to focus only on the wife as it is customary for household chores, taking care of children, and so on, to be done by the wife, whether as a full-time or part-time responsibility.

The Sharia Court's approach to proving indirect contributions is considered to be very simple and easy compared to establishing direct contributions. It is almost impossible for a wife not to perform household duties throughout the marriage. Moreover, no specific guidelines are stated in the statute as a guide for the parties and the Sharia Court to estimate such contributions. While direct contributions require documentary evidence related to the contribution, indirect contributions are the opposite. It is time for a step forward to be taken so that a comprehensive proposal is made to create specific guidelines related to these indirect contributions, considering several aspects can be broken down regarding these indirect contributions. This is because indirect contributions in one case of a claim for jointly acquired property are not the same as in another and should be carefully examined during the hearing before a judgment is made.

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