

IN THE FEDERAL HIGH COURT OF NIGERIA

IN THE ABUJA JUDICIAL DIVISION

HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/2241 /2025.

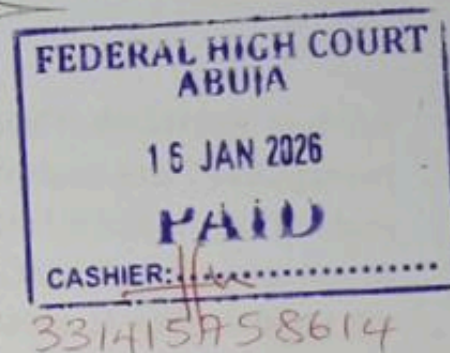
BETWEEN:

1. CHRISTABEL ZOE AYUK, ESQ.
2. QUEENDALINE ODINKEMMA EWO, ESQ.
3. EDEKI FRIDAY JOMANI, ESQ.
4. SUNDAY OKEREMUTE AKPORIDO, ESQ.
5. STEPHEN DANJUMA ZIRI, ESQ.
6. ABDULLAHI ABUBAKAR, ESQ.
7. CLIVE EYIMEARELU OTAIGBE, ESQ.
8. AKINWALE SUNDAY MICHAEL, ESQ.
9. TEMITOPE BENSON AKEREDOLU, ESQ.
10. ABDULAZEEZ AYOBAMI ABDULKAREEM, ESQ.
11. NDAMZI OGBONDA EKWULO, ESQ.
12. OSEIKHUEMEN AINABEBHOLO, ESQ.

(Suing for themselves as Nigerian legal practitioners and members of the Nigerian Bar Association and members of an unincorporated association of Nigerian lawyers known as the

'ADVOCACY FOR BAR LICENCE FREEDOM (ABLIF)

PLAINTIFFS/APPLICANTS.



AND

1. INCORPORATED TRUSTEES OF THE NIGERIAN BAR ASSOCIATION (NBA)
2. PRESIDENT, NIGERIAN BAR ASSOCIATION
3. GENERAL COUNCIL OF THE BAR (GCB) DEFENDANTS/RESPONDENTS.
4. CHIEF REGISTRAR OF THE SUPREME COURT OF NIGERIA.
5. ATTORNEY-GENERAL OF THE FEDERATION (AGF)

MOTION ON NOTICE

BROUGHT PURSUANT TO: Sections 6(6)(b), 36, and 46(1) & (2) of the Constitution of the Federal Republic of Nigeria 1999 (as amended);



Order 26 Rules 2 & 3, Order 28 Rule 1 and Order 35 Rules 1-3 of the Federal High Court (Civil Procedure) Rules 2019; and under the inherent jurisdiction of this Honourable Court.

**TAKE NOTICE** that this Honourable Court will be moved on the \_\_\_\_ day of \_\_\_\_\_ 2026, at the hour of 9 o'clock in the forenoon or so soon thereafter as Counsel may be heard on behalf of the Plaintiffs/Applicants for the following reliefs:

- i. **A DECLARATION OF THIS HONOURABLE COURT declaring** that the Continuing Professional Development (CPD) Compliance Notice issued and circulated by the Nigerian Bar Association Institute of Continuing Legal Education (NBA-ICLE) on or about the 11<sup>th</sup> January 2026, fixing 31 March 2026 as a compliance deadline, relates directly to and touches on the subject matter of this suit which is presently pending before this Honourable Court.
- ii. **A DECLARATION OF THIS HONOURABLE COURT declaring** that the issuance and circulation of the said Continuing Professional Development (CPD) Compliance Notice during the pendency of this suit, and in the face of a subsisting Bench Order of this Honourable Court directing parties to maintain the status quo, constitutes an act capable of undermining the authority and dignity of this Honourable Court.
- iii. **A DECLARATION OF THIS HONOURABLE COURT declaring** that the said Continuing Professional Development (CPD) Compliance Notice is illegal, invalid, null and void and of no effect whatsoever, pending the final determination of this suit.
- iv. **AN ORDER of this HONOURABLE COURT setting aside** the Continuing Professional Development (CPD) Compliance Notice issued by NBA-ICLE on or about the 11<sup>th</sup> January 2026.



- v. ***AN ORDER OF THIS HONOURABLE COURT*** punishing the 1<sup>st</sup> and 2<sup>nd</sup> Defendant for contempt of this Honourable Court pursuant to the provision of ***Order 35 Rule 1 of the Federal High Court (Civil Procedure) Rules, 2019.***
- vi. ***AN ORDER OF THIS HONOURABLE COURT*** restraining the Defendants/Respondents, whether by themselves, their agents, officers, privies, committees, or through Nigerian Bar Association-Institute of Continuing Legal Education (NBA-ICLE), from implementing, enforcing, giving effect to, or acting upon the said Continuing Professional Development (CPD) Compliance Notice against any legal practitioner (including the Plaintiffs/Applicants) pending the final determination of this suit.
- vii. ***AN ORDER OF THIS HONOURABLE COURT*** directing that the entire Continuing Professional Development (CPD)/Mandatory Continuing Professional Development (MCPD) regime forming the subject matter of this suit shall remain in abeyance and await the final decision of this Honourable Court.
- viii. ***AND FOR SUCH FURTHER ORDER(S) AS THIS HONOURABLE COURT*** may deem fit to make in the circumstances.

#### **GROUND(S) FOR THE APPLICATION**

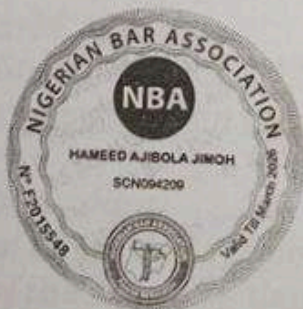
- a. This suit challenges the legality, constitutionality, and enforceability of the Continuing Professional Development (CPD)/Mandatory Continuing Professional Development (MCPD) regime.
- b. *The matter is fixed for hearing on 20<sup>th</sup> January 2026.*
- c. *This Honourable Court had at the proceedings of the 24<sup>th</sup> November, 2025, when this matter came up for hearing and the 1<sup>st</sup> and 2<sup>nd</sup>*



Defendants' Counsel were appeared in the matter, made a subsisting Bench Order directing all parties to maintain the status quo pending the determination of the suit.

- d. The 1<sup>st</sup> and 2<sup>nd</sup> Defendants/1<sup>st</sup> and 2<sup>nd</sup> Respondents were represented in Court by their legal team when the said order was made.
- e. Notwithstanding knowledge of the pendency of this suit and the subsisting order, Nigerian Bar Association- Institute of Continuing Legal Education (NBA-ICLE) issued and circulated a Continuing Professional Development (CPD) Compliance Notice fixing a compliance deadline.
- f. The said notice directly affects the subject matter of this suit and is capable of pre-empting the decision of this Honourable Court.
- g. The inherent jurisdiction of this Honourable Court includes the power to protect its authority and prevent acts capable of rendering its proceedings nugatory.
- h. It is in the interest of justice to grant this application.

Dated this 16<sup>th</sup> day of January, 2026.



Hameed Ajibola Jimoh Esq.

(Plaintiffs'/Applicants' Counsel)

**THE VICEGERENT LEGAL CONSULT,**  
No. 1, Salem Church Close, Off Dabban Street, Sabon-Geri Junction,  
Opp. ECWA Good News Church, Bwari, FCT-Abuja.



Phone No: 08168292549, 08085567456. Email:  
[hameed\\_ajibola@nigerianbar.ng](mailto:hameed_ajibola@nigerianbar.ng),  
[hameed\\_ajibola@yahoo.com](mailto:hameed_ajibola@yahoo.com)

**FOR SERVICE ON:**

**1. 1<sup>st</sup> and 2<sup>nd</sup> Defendants:**

*c/o their Counsel:*

ABDUL MOHAMMED, SAN.

CHIEF EMEKA OBEGOLU, SAN,

EKO EJMBI EKO, SAN,

J.J. USMAN, SAN,

YAKUBU PHILEMON, SAN.

ISIAKA KADIRI, ESQ.

H.I. HASSAN, ESQ.,

A. O. F. PHILIP., ESQ.,

S.T. MOMOH, ESQ.,

C.O. OGBU, ESQ.

D.O. ATITA, ESQ.

ASMA'U AHMED, ESQ.

U.I. UJAH, ESQ.,

I.Z. DANGANA, ESQ.

B.E. JAYE, ESQ.

G.O. ELIAS, ESQ.

N.U. USMAN, ESQ.,

I.Q. ABBEY, ESQ.

U.G. IKIOGHAM ESQ.

MADYAN LEGAL CONSULT,

NO. 4, Mubi Close, Off Emeka Anyaoku Crescent,  
Area 11, Garki, Abuja.

08067681669, 08033391892, 08136476696, 08035652645, 08033418538.  
[jjusman001@gmail.com](mailto:jjusman001@gmail.com) [jjusman001@nigerianbar.ng](mailto:jjusman001@nigerianbar.ng)

**2. 3<sup>rd</sup> Defendant:**

The General Council of the Bar,

*c/o Office of the Attorney-General of the Federation,*  
Federal Ministry of Justice, Abuja.

**3. 4th Defendant:**

WALE BALOGUN, SAN, LLM, MBA.  
Ifeoma Onuikwe, Esq.,  
Favour Otunenye, Esq.,  
Aishat Akanbi, Esq.,  
Okenwa Joy, Esq.,  
No. 8B, Bamako Street, Wuse Zone 1, Abuja,  
08033928546,  
Obalogun@greenbridge-law.com

**4. The 5th Defendant:**

The Attorney-General of the Federation,  
Federal Ministry of Justice, Abuja, C/O his Counsel:  
Maimuna L. Shiru (Mrs),  
Director, Civil Litigation & Public Law,  
Habibatu Udunma Chime,  
Okoye A.A. Princess,  
Bashir M. Imam,  
Office of the Hon. Attorney-General of the Federation  
and Minister of Justice,  
Federal Ministry of Justice, Maitama, Abuja.  
Bashir imam@justice.gov.ng  
08062381900.



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SUIT NO: FHC/ABJ/CS/2241 /2025.

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(Suing for themselves as Nigerian legal practitioners  
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'ADVOCACY FOR BAR LICENCE FREEDOM (ABLIF)

\_\_\_\_ PLAINTIFFS/APPLICANTS

AND

1. INCORPORATED TRUSTEES OF THE NIGERIAN BAR ASSOCIATION (NBA)
2. PRESIDENT, NIGERIAN BAR ASSOCIATION
3. GENERAL COUNCIL OF THE BAR (GCB) \_\_\_\_ DEFENDANTS/RESPONDENTS.
4. CHIEF REGISTRAR OF THE SUPREME COURT OF NIGERIA
5. ATTORNEY-GENERAL OF THE FEDERATION (AGF)



## AFFIDAVIT IN SUPPORT OF MOTION ON NOTICE

I, **CHRISTABEL ZOE AYUK, ESQ.**, Female, Adult, Legal Practitioner of Nigerian citizenship, and National Secretary of the Advocacy for Bar Licence Freedom (ABLIF), of Peace Close, Phase 3, Jikwoyi, AMAC, FCT-Abuja, do hereby make oath and state as follows:

1. That I am a Nigerian lawyer duly called to the Nigerian Bar, a member of the Nigerian Bar Association and the National Secretary of the '**ADVOCACY FOR BAR LICENCE FREEDOM (ABLIF)**' which is an unregistered association of some Nigerian lawyers who oppose the Defendants policy being complained about in this suit, and I am one of the Plaintiffs (also referred to as Applicants) in this suit and I have and or possess same interests in this suit as those of my co-Plaintiffs in regard to the subject matter(s) of this suit and by virtue of that position, I am conversant with the facts that I deposed to herein except where I state otherwise.
2. That I have the authority and consent of my co- Plaintiffs in this suit who are (to the best of my knowledge) also respectively Nigerian lawyer duly called to the Nigerian Bar, members of the Nigerian Bar Association and members of the '**ADVOCACY FOR BAR LICENCE FREEDOM (ABLIF)**' which is an unregistered association of some Nigerian lawyers, to depose to this affidavit and to state facts on their respective behalf as those facts concern them and I also have the consent of the National Convener by name '**Hameed Ajibola Jimoh, Esq.**' of the said '**ADVOCACY FOR BAR LICENCE FREEDOM (ABLIF)**' to depose facts and use documents or give evidence relating to the unregistered association as they relate to this suit, as myself and my co-Plaintiffs are members of the said unregistered association, except where I state otherwise.
3. That this suit challenges the legality, constitutionality, and enforceability of the Continuing Professional Development (CPD)/Mandatory



Continuing Professional Development (MCPD) regime, among other issues or complaints.

4. *That the matter is fixed for hearing on 20<sup>th</sup> January 2026.*
5. That this Honourable Court had at the proceedings *of the 24<sup>th</sup> November, 2025*, when this matter came up for hearing and the 1<sup>st</sup> and 2<sup>nd</sup> Defendants' Counsel appeared in the matter *and I was in Court and appeared too as the 1<sup>st</sup> Plaintiff*, made a subsisting Bench Order directing all parties to maintain the status quo pending the determination of the suit.
6. That the 1<sup>st</sup> and 2<sup>nd</sup> Defendants/1<sup>st</sup> and 2<sup>nd</sup> Respondents were represented in Court by their legal team when the said order was made. *I rely on the record of this Court of the 24<sup>th</sup> day of November, 2025, in evidence and proof this fact stated herein this paragraph 6.*
7. That, *on Sunday, January 11, 2026, (while this Suit and this Interlocutory Injunction Application is pending and despite) the Bench Order made by Your Lordship at the last adjourned date of 24<sup>th</sup> of November, 2025*, that parties should maintain status quo and not to do anything that would render whatever the decision of the Court would be on the subject matter (and in disobedience to such Bench Order made by Your Lordship), published a notice stated the compliance deadline of the mandatory *Continuing Professional Development (CPD) to be 1 April, to 31 March, wherein it is stated thus 'For clarity, the annual CPD reporting year runs from 1 April to 31 March. Accordingly, the 2025 CPD reporting period commenced on 1 April 2025 and will close on 31 March 2026. CPD activities completed outside this window will not count toward the current reporting year'.* The Assistant General Secretary (Henry Barnaba Ehi) of the 1<sup>st</sup> and 2<sup>nd</sup> Defendants via his whatsapp Number: 08037780064, issued and posted the said Notice on his personal Whatsapp Number and the 1<sup>st</sup> and 2<sup>nd</sup> Defendants also published same on its whatsapp handle. A printed copy of the said



*Whatsapp Print-Outs are hereby attached to this Further-affidavit and marked as Exhibit A1 and A2, respectively.*

8. That to the best of my knowledge, the above statement made by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants through their agents i.e. the Institute of Continuing Legal Education (ICLE) which is an agent of the 1<sup>st</sup> and 2<sup>nd</sup> Defendants/Respondents, was made in disobedience to the authority of this Honourable Court on this subject matter.

**CERTIFICATE IN COMPLIANCE WITH SECTION 84 OF THE EVIDENCE ACT, 2011 (AS AMENDED IN 2023)**

9. That I was informed on the 16<sup>th</sup> January, 2026, at about 9 am O' Clock in the forenoon or so soon thereafter, by Hameed Ajibola Jimoh, Esq., the Plaintiffs' Counsel in this suit, who personally handled the electronic transmission and printing of the documents referred to in the above paragraph 4(d) of this affidavit as Exhibit A, in my personal physical presence that the said documents were generated by computer processes as hereunder described, and I verily believe same and him (Hameed Ajibola Jimoh, Esq.) to be true as follows:
- i. that he downloaded Exhibits A1 and A2, respectively, from his WhatsApp chat on his Infinix Hot 12 Play (Android) mobile phone, which were each (i.e. each of the Exhibits) posted and or published by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants jointly and or severally by Whatsapp chats and other means of publication;
  - ii. That he further informed me that he transferred the said documents through the Bluetooth device on his said Infinix Hot 12 Play mobile phone to a Lenovo desktop computer system located at Shop J-7, Sky Memorial, Abuja, a business centre that regularly uses the said computer in the ordinary course of its business for receiving, processing, and printing documents;

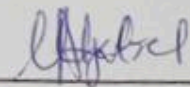


- iii. That the said Lenovo desktop computer and its connected Sharp MX- 4112N printer machine were, at all material times, in good working condition and were regularly used for processing and printing documents of this nature, and that the said documents were printed directly from the said computer;
  - iv. That the said productions and printings of the aforementioned Exhibits were done in my physical presence at the said Shop J-7, Sky Memorial, Abuja, on the 16<sup>th</sup> January, 2026, at about 9 am O' Clock or so soon thereafter and I personally witnessed the said printing process as described above;
  - v. That I was informed by the said Counsel, and I verily believe him, that the printed copies of the said documents are true, complete, and exact reproductions of the electronic copies posted and or published by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants jointly and or severally by Whatsapp chats and other means of publication, without any alteration or distortion whatsoever;
  - vi. That this affidavit is made in compliance with Section 84(1) and (2) of the Evidence Act, 2011 (as amended in 2023) to certify the manner in which the said computer-generated documents — Exhibits: A1 and A2, respectively, — were produced and printed;
  - vii. That I verily believe, based on the information given to me by the said Counsel and my personal observation, that the said Lenovo computer and Sharp MX-4112N printer at the said business centre are regularly used for processing operating properly at all material times, and that this affidavit serves as the certificate contemplated under Section 84(4) of the Evidence Act, 2011 (as amended);
10. That from the above evidence, notwithstanding knowledge of the pendency of this suit and the subsisting order, Nigerian Bar Association-Institute of Continuing Legal Education (NBA-ICLE) which is an agent of



the 1<sup>st</sup> and 2<sup>nd</sup> Defendants/Respondents, issued and circulated a Continuing Professional Development (CPD) Compliance Notice fixing a compliance deadline.

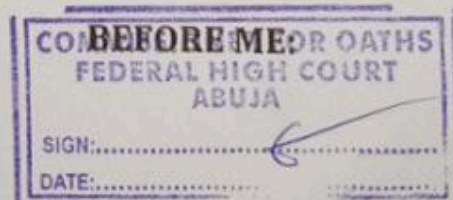
11. That to the best of my knowledge and that of my co-Plaintiffs, the said notice directly affects the subject matter of this suit and is capable of pre-empting the decision of this Honourable Court.
12. That to the best of my knowledge and that of my co-Plaintiffs, the inherent jurisdiction of this Honourable Court includes the power to protect its authority and prevent acts capable of rendering its proceedings nugatory.
13. That it is in the interest of justice to grant this application.
14. That I depose to this affidavit in good faith, conscientiously believing the facts herein to be true and correct, and in accordance with the Oaths Act.

  
\_\_\_\_\_

DEPONENT.

SWORN TO at the Federal High Court of Nigeria Registry, Abuja,

this 16<sup>th</sup> day of JAN, 2026.



COMMISSIONER FOR OATHS.

16/1/26





Nigerian Bar Associa...  
11K followers



**NIGERIAN BAR ASSOCIATION**

INSTITUTE OF CONTINUING LEGAL EDUCATION

*REMINDER*



**COMPLIANCE WITH  
5 CPD UNITS**

**REPORTING YEAR ENDS:  
31<sup>ST</sup> MARCH 2026**

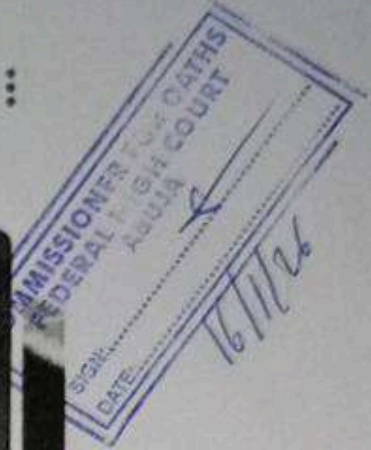
**5 CPD Units Compliance Deadline – 31  
March 2026**

Dear Learned Silk/Colleague,

This is a gentle reminder from the  
NBA Institute of Continuing Legal  
Education (NBA-ICLE) on your Continuing  
Professional Development (CPD)  
obligations for the current reporting year.

To remain in good standing and fully  
compliant with the NBA MCPD Rules, every  
legal practitioner is required to complete  
and record a minimum of five (5) CPD  
Hours/ Units on or before 31 March 2026.

For clarity, the annual CPD reporting  
year runs from 1 April to 31 March.  
Accordingly, the 2025 CPD reporting period







~~2~~

...

For clarity, the annual CPD reporting year runs from 1 April to 31 March. Accordingly, the 2025 CPD reporting period commenced on 1 April 2025 and will close on 31 March 2026. CPD activities completed outside this window will not count toward the current reporting year.

**Mandatory Requirement:**

- Stay informed, stay compliant, and let us continue to uphold and advance the standards of our noble profession.

**NBA Institute of Continuing Legal Education (NBA-ICLE)**  
...Advancing Professional Growth

9:45 AM





8:59 AM

EXHIBIT A2



HN

Henry Barnabas NLS  
online

Sunday



### 5 CPD Units Compliance Deadline – 31 March 2026

Dear Learned Silk/Colleague,

This is a gentle reminder from the NBA Institute of Continuing Legal Education (NBA-ICLE) on your Continuing Professional Development (CPD) obligations for the current reporting year.

To remain in good standing and fully compliant with the NBA MCPD Rules, every legal practitioner is required to complete and record a minimum of five (5) CPD Hours/ Units on or before 31 March 2026.

For clarity, the annual CPD reporting



Message





← HM Henry Barnabas NLS online

For clarity, the annual CPD reporting year runs from 1 April to 31 March. Accordingly, the 2025 CPD reporting period commenced on 1 April 2025 and will close on 31 March 2026. CPD activities completed outside this window will not count toward the current reporting year.

#### Key Information

##### Mandatory Requirement:

1. Minimum of 5 CPD Units/Hours
2. Compliance Deadline: Tuesday, 31 March 2026

3. Action Required: Log in to the NBA-ICLE Portal to register for approved CPD programmes and close any outstanding unit gaps.

4. Advisory: Early compliance is strongly encouraged. Kindly avoid last-minute registrations and ensure your records are properly updated.

Stay informed, stay compliant, and let us continue to uphold and advance the standards of our noble profession.

Kind regards,

**NBA Institute of Continuing Legal Education (NBA-ICLE)**

...Advancing Professional Growth

Stay Updated. Stay Compliant.

😊 Message





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HOLDEN AT ABUJA

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and members of an unincorporated association  
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2. PRESIDENT, NIGERIAN BAR ASSOCIATION
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5. ATTORNEY-GENERAL OF THE FEDERATION (AGF)



## WRITTEN ADDRESS IN SUPPORT OF THE MOTION

### 1.0. INTRODUCTION:

- 1.1. My Lord, this application goes to the very foundation of judicial authority. The Plaintiffs do not approach this Court lightly. They approach this Court to protect the sanctity of its proceedings and to ensure that no party, however eminent, conducts itself in a manner capable of overreaching the Court.
- 1.2. The application is accompanied with a 14-paragraphs affidavit. We rely on all the paragraphs of the affidavit.
- 1.3. The Plaintiffs'/Applicants' reliefs are as contained on the face of the Motion paper.

### 2.0. ISSUE FOR DETERMINATION

Whether, in the circumstances of this case, this Honourable Court ought to set aside the Continuing Professional Development (CPD) Compliance Notice issued by Nigerian Bar Association- Institute of Continuing Legal Education (NBA-ICLE) and restrain its implementation, having regard to the pendency of this suit and the subsisting order of status quo made by this Honourable Court?

### 3.0. LEGAL ARGUMENT

- 3.1. My Lord, we humbly submit in the affirmative in answer to this question formulated for determination as an issue.
- 3.2. My Lord, it is settled beyond controversy that once a matter is before a court of competent jurisdiction, parties are bound to refrain from any conduct capable of foisting a *fait accompli* on the court.
- 3.3. My Lord, the Continuing Professional Development-herein after referred to as-CPD- Compliance Notice issued by Nigerian Bar



Association- Institute of Continuing Legal Education herein after referred to as-NBA-ICLE- does not exist in a vacuum. It speaks directly to the subject matter of this suit. To issue and circulate such a notice, fixing a compliance deadline and exerting regulatory pressure on legal practitioners (including the Plaintiffs/Applicants), while the legality of the regime itself is under judicial interrogation, is to invite chaos into the administration of justice.

3.4. My Lord, the gravamen of this application is not mere disobedience; it is institutional overreach.

3.5. My Lord, Courts have consistently held that acts done during the pendency of a suit, which tend to prejudice the res or undermine the authority of the court, are liable to be set aside. *See:*

- i. *Military Governor of Lagos State v. Ojukwu (1986) 1 NWLR (Pt. 18) 621;*
- ii. *Mobil Oil (Nig.) Ltd v. Assan (1995) 8 NWLR (Pt. 412) 129.*

3.6. My Lord, we humbly submit that obedience to court orders is not optional. It is the bedrock of constitutional democracy. Where a court orders maintenance of status quo, no party is permitted to act in a manner that alters, disturbs, or pressures the existing state of affairs, whether directly or indirectly.

3.7. It is therefore submitted, with the greatest respect, that the CPD Compliance Notice must give way to the authority of this Honourable Court.

3.8. My Lord, in the case of *Mobil Oil (Nig.) Ltd v. Assan (supra)*, the Supreme Court of Nigeria held that

*'The phrase 'contempt of court' does not in the least describe the true nature of the class of offence with*



*which we are here concerned..... The offence consists in interfering with the administration of the law; in impeding and perverting the course of justice ..... It is not the dignity of the Court which is offended - a petty and misleading view of the issues is the fundamental supremacy of the law which is challenged'. We equally refer Your Lordship to the case of A-G V Times Newspapers Ltd. (1974) AC 273.*

- 3.9. My Lord, it is important for us to bring to the attention of Your Lordship that *on Sunday, January 11, 2026, (while this Suit and this Interlocutory Injunction Application is pending and despite) the Bench Order made by Your Lordship at the last adjourned date of 24<sup>th</sup> of November, 2025, that parties should maintain status quo and not to do anything that would render whatever the decision of the Court would be on the subject matter (and in disobedience to such Bench Order made by Your Lordship), published a notice stated the compliance deadline of the mandatory Continuing Professional Development (CPD) to be 1 April, to 31 March, wherein it is stated thus 'For clarity, the annual CPD reporting year runs from 1 April to 31 March. Accordingly, the 2025 CPD reporting period commenced on 1 April 2025 and will close on 31 March 2026. CPD activities completed outside this window will not count toward the current reporting year'.* The Assistant General Secretary (Henry Barnaba Ehi) of the 1<sup>st</sup> and 2<sup>nd</sup> Defendants via his whatsapp Number: 08037780064, issued and posted the said Notice on his personal Whatsapp Number and the 1<sup>st</sup> and 2<sup>nd</sup> Defendants also published same on its whatsapp handle. A printed copy of the said Whatsapp PrintOuts have been attached to the Plaintiffs' affidavit herein and marked as Exhibit A1 and A2, respectively, with certificate of compliance with Section 84 of the Evidence Act, 2011.



3.10. My Lord, we humbly submit that to the best of our knowledge, the above statement made by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants through their agents i.e. the Institute of Continuing Legal Education (ICLE) (*agent to the 1<sup>st</sup> and 2<sup>nd</sup> Defendants*) was made in disobedience to the authority of this Honourable Court on this subject matter. This Honourable Court is urged to so hold.

3.11. We therefore humbly urge and pray this Honourable Court to *declare such publication invalid and or illegal and of no effect and to hold the 1<sup>st</sup> and 2<sup>nd</sup> Defendants jointly and or severally in contempt of this Honourable Court for disrespect and or disobedience of this Honourable Court*, same having been issued and or published by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants and their agents while this Suit is pending and despite the Bench Order made by this Honourable Court that parties to this Suit shall maintain *status quo* on the subject matter of this Suit pending the final determination of the Suit by this Court.

3.12. My Lord, *in the case of C.O.P. V Omanukwue (1999) 2 NWLR (Pt. 590) 190, Pp. 201-202, paras. H-A), C.A.*, the Court of Appeal of Nigeria held thus

*'Traditionally, contempts are classified into two, civil and criminal. A civil contempt basically comprises the failure to comply with an order of court. the rules of civil contempt like those of criminal contempt are concerned to uphold effective administration of justice. A person who has committed a civil contempt by disobeying a court order may be subject to the rule that a party in contempt cannot be heard or take proceedings in the same cause until he has purged his contempt.*



*Mobil Oil (Nigeria) Ltd. V Assan (1995) 8 NWLR (Pt. 412) 129, at 132, referred to.*

3.13. *We equally refer Your Lordship to Order 35 Rules 1-3 of the Federal High Court (Civil Procedure) Rules, 2019.*

3.14. My Lord, we humbly submit that it is the duty of this Honourable Court to protect and ensure that orders lawfully made are not rendered useless or nugatory by the action and conduct of the parties, such as the 1<sup>st</sup> and 2<sup>nd</sup> Defendants jointly and or severally and other Defendants in this Suit. *We humbly refer to the case of Globestar Eng. (Nig.) Ltd. V Malle Holdings Ltd. (1999) 10 NWLR (Pt. 622) 270, (P. 283, para. H).*

3.15. *Furthermore, My Lord, on the need for this Honourable Court to protect its authority from being disrespected and or disregarded by the parties in this Suit, especially the Defendants jointly and or severally, the Supreme Court of Nigeria held in the case of Adejugbe v Aduloju (2022) 3 NWLR (Pt. 1816) 131, S.C. thus*

*'Every Court has the inherent duty to protect its authority and its processes from being disregarded and frustrated by any person particularly parties in cases before it. When such an affront and contempt arises, it must be promptly addressed before any further step is taken in the proceedings. If a court allows a party before it or any person to affront its authority and contempt its process with impunity, it loses its capacity of effective and efficient adjudication and cannot deliver justice in the case before it. Whatever it does, without addressing the contempt for its process and authority, would amount to an inflated pretention and a charade'.*



Also see: *Oguebego v P.D.P.* (2016) 4 NWLR (Pt. 1503) 446.

3.16. Also, My Lord, in *Ebodaghe v. Okoye* (2004) 18 NWLR (Pt 905) 472 at 494 – 495, held:

*"Where an issue of jurisdiction is raised by a party, the court ought generally to take it first. However, where an act which would impugn on the majesty of a court, and likely to bring the court to odium and disrespect is done, it is not just desirable but essential for the court to first look into the matter of contempt before proceeding on the issue of jurisdiction because it is the duty of the court, at all times, to guard jealously its powers and should give first consideration to committal proceedings even when it is faced with the question of its competence to adjudicate on a matter from which the contempt issue arose. In the instant case, the Court of Appeal erred when it held that the trial court ought to have determined the issue of its jurisdiction first notwithstanding the issue of misrepresentation of the court's proceedings brought to its attention."*  
(Underlining is mine for emphasis).

3.17. Finally, therefore My Lord, we humbly submit that the issuance and or publication of Exhibits A1 and A2 respectively attached to the Plaintiffs' affidavit herein amount to *contempt of this Honourable Court for which the said 1<sup>st</sup> and 2<sup>nd</sup> Defendants shall be so held by this Honourable Court and for this Honourable Court to declare such publication invalid and or illegal and of no effect for disrespect and or disobedience of this Honourable Court*, same having been issued and or published by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants and their agents while



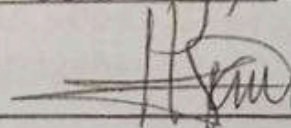
this Suit is pending and despite the Bench Order made by this Honourable Court that parties to this Suit shall maintain status quo on the subject matter of this Suit pending the final determination of the Suit by this Court. This Honourable Court is urged to so hold.

3.18. We therefore humbly urge and pray this Honourable Court to *declare such publication invalid and or illegal and of no effect and to hold the 1<sup>st</sup> and 2<sup>nd</sup> Defendants jointly and or severally in contempt of this Honourable Court for disrespect and or disobedience of this Honourable Court*, same having been issued and or published by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants and their agents while this Suit is pending and despite the Bench Order made by this Honourable Court that parties to this Suit shall maintain *status quo* on the subject matter of this Suit pending the final determination of the Suit by this Court.

#### 7.0. CONCLUSION:

7.1. My Lord, we urge and pray this Honourable Court to resolve all the issues for determination as formulated by the Plaintiffs in their favour and to declare such publication invalid and or illegal and of no effect and to hold the 1<sup>st</sup> and 2<sup>nd</sup> Defendants jointly and or severally in contempt of this Honourable Court for disrespect and or disobedience of this Honourable Court, same having been issued and or published by the 1<sup>st</sup> and 2<sup>nd</sup> Defendants and their agents while this Suit is pending and despite the Bench Order made by this Honourable Court that parties to this Suit shall maintain *status quo* on the subject matter of this Suit pending the final determination of the Suit by this Court.

Dated this 16<sup>th</sup> day of January, 2026.



Hameed Ajibola Jimoh Esq.



(Plaintiffs'/Applicants' Counsel)

THE VICEGERENT LEGAL CONSULT,  
No. 1, Salem Church Close, Off Dabban Street, Sabon-Geri Junction,  
Opp. ECWA Good News Church, Bwari, FCT-Abuja.  
Phone No: 08168292549, 08085567456. Email:  
[hameed\\_ajibola@nigerianbar.ng](mailto:hameed_ajibola@nigerianbar.ng),  
[hameed\\_ajibola@yahoo.com](mailto:hameed_ajibola@yahoo.com)

**FOR SERVICE ON:**

**1. 1<sup>st</sup> and 2<sup>nd</sup> Defendants:**

*c/o their Counsel:*

ABDUL MOHAMMED, SAN.  
CHIEF EMEKA OBEGOLU, SAN,  
EKO EJMBI EKO, SAN,  
J.J. USMAN, SAN,  
YAKUBU PHILEMON, SAN.  
ISIAKA KADIRI, ESQ.  
H.I. HASSAN, ESQ.,  
A. O. F. PHILIP., ESQ.,  
S.T. MOMOH, ESQ.,  
C.O. OGBU, ESQ.  
D.O. ATITA, ESQ.  
ASMA'U AHMED, ESQ.  
U.I. UJAH, ESQ.,  
I.Z. DANGANA, ESQ.  
B.E. JAYE, ESQ.  
G.O. ELIAS, ESQ.  
N.U. USMAN, ESQ.,  
I.Q. ABBEY, ESQ.  
U.G. IKIOGHAM ESQ.

MADYAN LEGAL CONSULT,

NO. 4, Mubi Close, Off Emeka Anyaoku Crescent,  
Area 11, Garki, Abuja.

08067681669, 08033391892, 08136476696, 08035652645, 08033418538.  
[jjusman001@gmail.com](mailto:jjusman001@gmail.com) [jjusman001@nigerianbar.ng](mailto:jjusman001@nigerianbar.ng)

**2. 3<sup>rd</sup> Defendant:**

*The General Council of the Bar,*



*Office of the Attorney-General of the Federation,  
Federal Ministry of Justice, Abuja.*

**3. 4th Defendant:**

**WALE BALOGUN, SAN, LLM, MBA.**  
**Ifeoma Onuikwe, Esq.,**  
**Favour Otunyenye, Esq.,**  
**Aishat Akanbi, Esq.,**  
**Okenwa Joy, Esq.,**  
**No. 8B, Bamako Street, Wuse Zone 1, Abuja,**  
**08033928546,**  
**Obalogun@greenbridge-law.com**

**4. The 5th Defendant:**

**The Attorney-General of the Federation,**  
**Federal Ministry of Justice, Abuja, C/O his Counsel:**  
**Maimuna L. Shiru (Mrs),**  
**Director, Civil Litigation & Public Law,**  
**Habibatu Udunma Chime,**  
**Okoye A.A. Princess,**  
**Bashir M. Imam,**  
**Office of the Hon. Attorney-General of the Federation**  
**and Minister of Justice,**  
**Federal Ministry of Justice, Maitama, Abuja.**  
**Bashir imam@justice.gov.ng**  
**08062381900.**