



EBUN-OLU ADEGBORUWA SAN & CO

BARRISTERS | SOLICITORS | CONSULTANTS



Our Ref: A&C/RC/L-10/09/25

Monday, September 29, 2025

The Managing Director,
Renaissance Africa Energy Company Ltd.,
21/22 Marina, Lagos, Nigeria.

OR

The Managing Director,
Renaissance Africa Energy Company Ltd.,
Plot 461, Constitution Avenue,
Central Business District, Abuja.



Dear Sir,

"without prejudice"

**IN THE MATTER OF SUBSISTING AND CONTINUED LOSSES
SUFFERED BY THE ESTATE OF LATE MR. ETO SONAM OBHUO
OWING TO THE HORRIFIC MEDICAL NEGLIGENCE AT SHELL
INDUSTRIAL AREA HOSPITAL, RUMUOBIAKANI, PORTHACOURT,
RIVERS STATE, NIGERIA**

DEMAND FOR COMPENSATION IN THE SUM OF \$100,000,000.00

Introduction

We act as the retained Solicitors to the family of Late Mr. Eto Sonam Obhuo, being represented by Itohan Obhuo and Nayelam Obhuo, the Legal Administrators of the Estate of Late Mr. Eto Sonam Obhuo (hereafter referred to as *Our Client/the Family*) and on whose behalf and express instructions we write your highly esteemed office on the subject matter captioned above.

Brief Background Facts

- (1.) It is our brief that sometimes on or about the 16th day of June 2011, the late Mr. Eto Sonam Obhuo, then a staff of then Shell Petroleum Development Company of Nigeria (now Renaissance Africa Energy Company Limited (*your Company*)), was rushed to *Shell Industrial Areal Hospital, Rumuobiakani, Porthacourt Rivers State*, where he was admitted and tragically passed away on the same 16th day of June 2011, barely 15 hours under your Company's care.

LEKKI LAW CENTER[®]

Jesus Arena, 'Kogun Chambers

Itedo / Freedom Way, Off Admiralty Way | Lekki Phase 1, Lagos - Nigeria.

Tel: 0810 000 0758 | 0810 000 0759 | 0803 301 6673 | 0803 324 6500 • Email: adegboruwalaw@yahoo.com | adegboruwalaw@gmail.com

For further information

His death, as revealed by inquiries, medical reports and other documented circumstances, was occasioned by gross if not horrific medical negligence on the part of your Company and its medical personnel, notably **Dr. Amos Essien, Dr. Omoruyi Asemota and other attending staff**, who all failed in their duty of care, to the deceased.

- (2.) Whereas, from records and extant preliminary findings availed on this matter, it has been revealed that the circumstances leading to the death of Late Mr. Eto Sonam Obhuo at the hands of your Company's medical staff was NOT natural; further revelations have shown glaring discrepancies on the medical case notes and post-mortem records, pointing to a cover-up of likely criminal liability rather than transparency, leading to the intervention of law enforcement agencies for the determination of any culpability in the demise of Late Mr. Eto Sonam Obhuo. The outcome is aptly captured in the report of police investigation on the matter and the interim report of the Investigation Panel of the Medical and Dental Practitioners Disciplinary Committee.
- (3.) Notwithstanding the extant narrative on likely criminal liability/culpability of the medical personnel involved in the demise of Late Mr. Eto Sonam Obhuo (**the Deceased**), the prevalence of gross medical negligence in the death of the Deceased is not in dispute. The particulars of negligence are, inter alia state as follows:

PARTICULARS OF MEDICAL NEGLIGENCE

Lack of Consent

- A) **Failure to obtain informed consent** before administering a regimen of medication on the Deceased.

Our investigation reveals that Mr Eto Sonam Obhuo (Deceased) was administered a regimen of medication without his prior and voluntary informed consent.

The specific drugs, dosages and potential risks were not adequately disclosed to or discussed with the patient or his family, thus depriving them of the opportunity to make informed decisions.

Deliberate Criminal Non-Disclosures

- B) **Non-disclosure of critical medical information** regarding drugs, dosages, and risks thereto, thereby depriving the deceased and his

family of the opportunity to make informed decision about the treatment, thus resulting in fatal consequence.

Unauthorized Insertion

- C) **Unauthorized insertion of airway adjuncts (Oropharyngeal Airways OPAs)** without documented consent, thereby exposing the deceased to complications, including aspiration. Airway adjuncts were inserted into the patient without obtaining proper and documented consent. This unauthorized intervention not only violated the patient's anatomy but also significantly contributed to the tragic outcome.

There is no gainsaying the fact that some medical procedure can increase the risk of aspiration and evidence-based medicine has observed that aspiration is one of the complications of using airway adjuncts.

Further to the above, from the clinical notes, the airway intervention was an emergency as the patient was said to have stopped breathing, so the attending doctor ought to have done an endotracheal intubation.

In other words, the airway management protocol was negligent.

Lack of Monitoring

- D) **Failure to monitor the patient appropriately**, which resulted in aspiration of stomach contents, a preventable complication that directly led to his death. There was a glaring lack of appropriate monitoring and this oversight led to the aspiration of stomach content, respiratory depression and neuroleptic malignant syndrome, all preventable complications that directly resulted in the patient's death. Proper monitoring and timely intervention could have saved the patient's life.

Lack of Timely and Adequate Medical Intervention

- E) **The pathology report confirmed cyanosis** of the oral mucous membranes and fingernail beds, indicative of hypoxemia and respiratory distress, prior to death, which would have been prevented with timely and adequate medical intervention.

Cyanosis in a deceased individual can provide valuable information about the circumstances surrounding their death.

- (i) In the circumstances of this case, it points to hypoxemia or cardiovascular or respiratory problem or respiratory distress

before death, occasioned by airway obstruction and impaired gas exchange or drug reaction as a very important life-threatening complication/side effect of chlorpromazine (largactil). One of the cocktails of drugs administered on the deceased is neuroleptic malignant syndrome.

- (ii) The deceased actually showed one of the telltale signs to indicate he had suffered neuroleptic malignant syndrome as medical notes and the attending doctors confirmed the patient was confused and agitated.
- (iii) This failure to recognize neuroleptic malignant syndrome which requires immediate medical attention led to the avoidable death of the deceased, particularly in the instant case where the attending doctors combined diazepam and largactil, a combination which can cause respiratory depression.
- (iv) Failure to anticipate and prepare for neuroleptic malignant syndrome or respiratory depression occasioned by the cocktail of drugs administered on the deceased by treating the patient in the general ward as against the intensive care unit and lack of proper monitoring or use of defective monitors in the hospital led to the death of the patient.

FURTHER CASES OF MEDICAL NEGLIGENCE

- F. If monitors were not defective, it will give accurate clinical parameters such as body temperature, and vital signs in real time and were the nurses attentive, they would have observed muscle rigidity, neurological signs such as tremors, dystonia or other abnormal movements, even his disturbed mental status of confusion and agitation are indicators that should have alerted the attending physicians and nurses, a clear sign which they missed.
- G. The doctors have no clear or working diagnosis as a cursory look at page 30 of the clinical notes suggested that the patient was being treated for maniac disorder /exacerbation aggressive disorder while at page 31, it is chronic schizophrenia. We then ask, if there is no working diagnosis, how then did they administer treatment?
- H. If the deceased "ETO SONAM OBHUO" had received prompt medical attention and the attending medical

1. **Full and unconditional disclosure** of all relevant medical records, documentation, and case notes relating to the treatment of Late Mr. Eto Sonam Obhuo, particularly all the nursing chats, temperature and oxygen saturation recording of the patient's chat.
2. **A comprehensive explanation** of SPDC's medical policies and procedures that were in place at the material time, and why they failed to prevent such gross negligence.
3. **Disclosure of any internal investigation or review** conducted by SPDC into the circumstances of the death, together with certified copies of such reports.
4. **Immediate computation and payment** of all accrued death benefits due to the Estate of Late Mr. Eto Sonam Obhuo, through our office.
5. **Payment of the sum of USD 100,000,000.00 (One Hundred Million United States Dollars)** as adequate compensation to the family for the wrongful death, loss of dependency, pain, suffering, and emotional distress occasioned by the negligence of your Company and its members of staff.

TAKE NOTICE that if within **fourteen (14) days** of the receipt of this letter by your Company, we do not receive a positive response/effort aimed at ameliorating the plight of our Client with a view of resolving the extant grievances permanently and other pending legal matters, we have our Client's firm instructions to take out appropriate legal proceedings against your Company, both civil and criminal, without further recourse to your Company.

Please accept the assurances of our highest regards always.

Yours faithfully,


 **SIGNED**
EBUN-OLU ADEGBORUWA, SAN
EBUN-OLU ADEGBORUWA, SAN

cc:

The Managing Director,
 Shell PLC (UK),
 Shell Center, London.
 SE1 7NA, United Kingdom.





13 January 2026

Dear Customer,

This is a proof of delivery / statement of final status for the shipment with waybill number 5065893652.

Thank you for choosing DHL Express.

www.dhl.com

Your shipment 5065893652 was delivered on 01 October 2025 at 15.32

Signed	THE CHIEF EXECUTIVE OFFICER	Receiver Name	SHELL PLC
Shipment Status	Delivered	Receiver Address	SHELL PLC- SHELL CENTER , 2 YORK ROAD, LONDON , UNITED KINGDOM UNITED KINGDOM
		Piece ID(s)	JD014600012288066983

Additional Shipment Details

Service	EXPRESS EASY doc	Shipper Name	EBUN-OLU ADEGBORUWA SAN & CO
Picked Up	29 September 2025 at 10.11	Shipper Address	ITEDO/FREEDOM WAY LEKKI 1 LAGOS STATE NIGERIA
Number of Pieces	1		
Weight	0.30 lbs / 0.14 kg	Shipper Reference	5065893652NG20250929101117917 ADE
Contents	DOCUMENTS - GENERAL BUSINESS		