



NIGERIAN BAR ASSOCIATION LAWYERS WITH DISABILITIES FORUM

NBA House, Plot 1101 Muhammadu Buhari Way, Central Business District, Abuja F.C.T Nigeria

0703 441 6144 nba-lwdf@nigerianbar.org.ng

22nd January, 2026

The Honourable Minister of Health
Federal Ministry of Health
Federal Secretariat Complex
Abuja, FCT.

Dear Sir/Madam,

PRE-ACTION NOTICE OF INTENTION TO COMMENCE LEGAL PROCEEDINGS

RE: ALLEGED DISCRIMINATION AND DENIAL OF REASONABLE ACCOMMODATIONS AGAINST MS. UCHE OLIVIA DURING ENTRANCE EXAMINATION FOR FEDERAL NEUROPSYCHIATRIC SCHOOL OF POST-BASIC MENTAL HEALTH NURSING, ENUGU.

We act as Solicitors to Ms. Uche Olivia, (hereinafter referred to as our Client) on whose instructions and direction we write you as hereunder contained, to formally notify you of her intention to commence legal proceedings against the Federal Ministry of Health for failure of statutory oversight resulting in discrimination against her at a federal health training institution under your Ministry.

It is our Client's brief that our Client, a registered nurse with visual impairment, sat for the entrance examination into the Federal Neuropsychiatric School of Post-Basic Mental Health Nursing, Enugu, on the 22nd day of March, 2025. Prior to the examination, she formally requested reasonable accommodations, including but not limited to large-print question papers, a reader/scribe, and/or additional time, necessary to facilitate her participation given her disability.

Despite these requests and reminders shortly before the examination, the School failed to provide any accommodation. On the day of the examination, the School wilfully failed, refused, and neglected to provide any accommodation whatsoever. Our client was subjected to undue delay, humiliation, dismissive conduct, and was effectively compelled to attempt an examination she could not reasonably access. When she sought assistance from an examiner and the Provost, she was told to "answer only what she could see," a statement that is demeaning, discriminatory, and wholly indefensible in law and ethics.

COUNCIL MEMBERS:

Patience Nkeonyeasua Etumudon - **Chairperson**;

Sani Moyi - **Alternate Chairman**; Rex Eramah - **Secretary**; Florence Marcus - **Member**; Justice Christopher - **Member**; Arinze Mbanefo - **Member**;
Damilola Victoria Alabi - **Co-opted Member**; Omolade Martha Ijeh - **NBA Liaison Officer**

The conduct of these Institutions (the School and the Hospital) supervised by your Ministry constitutes a flagrant breach of our client's right to dignity of the human person and freedom from discrimination contrary to the Constitution of the Federal Republic of Nigeria, the Discrimination Against Persons with Disabilities (Prohibition) Act, 2018, and other relevant laws which imposes a mandatory duty on public institutions to provide reasonable accommodations to persons with disabilities, particularly in access to education and examinations. The failure complained of was not accidental; it was systemic, deliberate, and reflective of institutional disregard for the rights of persons with disabilities.

The Ministry bears supervisory responsibility for ensuring compliance with federal laws and policies within institutions under its control. The failure to ensure compliance constitutes a breach of statutory duty.

By reason of the foregoing acts and omissions, our client has suffered psychological trauma, public humiliation, loss of opportunity, and unlawful exclusion from an educational process for which she was otherwise qualified.

TAKE NOTICE that unless within thirty (30) days from receipt of this letter the Ministry:

1. Issues a formal written apology to Ms. Uche Olivia, to be published on the Hospital's official platforms and in two (2) national dailies;
2. Pays ₦10,000,000.00 (Ten Million Naira only) as compensation; and
3. Issues enforceable directives mandating disability-inclusive practices in federal health institutions,

We shall proceed to institute legal action without further notice. This notice shall be relied upon as compliance with all statutory pre-action requirements.

Yours faithfully,



PATIENCE N. ETUMUDON (MS.)
Chairperson



JUSTICE CHRISTOPHER
Chairman, Litigation
Committee, NBA-LWDF
07034416144 , 08033237101



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22nd January, 2026

The Provost / Head of Institution

Federal Neuropsychiatric School of Post-Basic Mental Health Nursing

Federal Neuropsychiatric Hospital

Enugu State.

Dear Sir/Madam,

PRE-ACTION NOTICE OF INTENTION TO COMMENCE LEGAL PROCEEDINGS

RE: ALLEGED DISCRIMINATION AND DENIAL OF REASONABLE ACCOMMODATIONS AGAINST MS. UCHE OLIVIA DURING ENTRANCE EXAMINATION FOR FEDERAL NEUROPSYCHIATRIC SCHOOL OF POST-BASIC MENTAL HEALTH NURSING, ENUGU.

We write to you as Solicitors to Ms. Uche Olivia, (hereinafter referred to as our Client) on whose instructions and direction we write you as hereunder contained, pursuant to the relevant laws regulating actions against public institutions and statutory bodies, to formally notify you of her intention to commence legal proceedings against the Federal Neuropsychiatric School of Post-Basic Mental Health Nursing, Enugu, should this matter not be resolved within the time prescribed by law.

It is part of Our Client's brief, that our Client, a registered nurse with visual impairment, applied for and presented herself for the entrance examination conducted by your School on the 22nd day of March, 2025. Prior to the examination, she formally notified your institution of her visual impairment and requested reasonable accommodations, including large-print examination materials, additional time, and/or the assistance of a reader or scribe. These requests were ignored.

On the examination day, your officials failed and refused to provide any accommodation. Our client was delayed, humiliated, and dismissed when she requested assistance, and was told to "answer only what she could see." This conduct amounted to exclusion and discrimination on the ground of disability.

Your actions and omissions constitute a grave violation of our client's right to dignity of the human person and freedom from discrimination, and a flagrant breach of the Discrimination Against Persons with Disabilities (Prohibition) Act, 2018, the Constitution of the Federal Republic of Nigeria and other relevant laws which imposes a mandatory obligation on public educational institutions to provide reasonable accommodations.

COUNCIL MEMBERS:

Patience Nkeonyeasua Etumudon - Chairperson;

Sani Moyi - Alternate Chairman; Rex Eramah - Secretary; Florence Marcus - Member; Justice Christopher - Member; Arinze Mbanefo - Member; Damilola Victoria Alabi - Co-opted Member; Omolade Martha Ijeh - NBA Liaison Officer

TAKE NOTICE that you are hereby advised to within thirty (30) days from receipt of this letter to:

1. Issues a written public apology to Ms. Uche Olivia, to be published on the School's official platforms and 2 (two) national dailies;
2. Pays the sum of ₦10,000,000.00 (Ten Million Naira only) as compensation; and
3. Gives a written undertaking to comply with disability-inclusive examination standards,

In the event of your failure to comply with these demands within the stipulated period, our client shall be constrained to seek judicial redress, including declaratory reliefs, damages, injunctive orders, and ancillary reliefs, in a competent court of law. This letter shall be relied upon as proof of compliance with all statutory pre-action requirements.

Yours faithfully,



PATIENCE N. ETUMUDON (MS.)
Chairperson



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22nd January, 2026

**The Chief Medical Director
Federal Neuropsychiatric Hospital
Enugu State.**

Dear Sir/Madam,

PRE-ACTION NOTICE OF INTENTION TO COMMENCE LEGAL PROCEEDINGS

RE: ALLEGED DISCRIMINATION AND DENIAL OF REASONABLE ACCOMMODATIONS AGAINST MS. UCHE OLIVIA DURING ENTRANCE EXAMINATION FOR FEDERAL NEUROPSYCHIATRIC SCHOOL OF POST-BASIC MENTAL HEALTH NURSING, ENUGU.

We act as Solicitors to Ms. Uche Olivia, (hereinafter referred to as our Client) on whose instructions and direction we write you as hereunder contained, pursuant to the relevant laws regulating actions against public institutions and statutory bodies, to formally notify you of her intention to commence legal proceedings against the Federal Neuropsychiatric Hospital, Enugu, arising from discriminatory acts connected with the entrance examination into the School operated under your control.

It is Our Client's brief that the Hospital, through its officers and agents, failed to ensure that reasonable accommodations were provided to our Client, a registered nurse with visual impairment during the aforementioned examination, despite prior notice of her disability. On the 22nd of March, 2025, the examination day, the School wilfully failed, refused, and neglected to provide any accommodation whatsoever. Consequently, our Client faced undue delays, humiliation, dismissive conduct, and was effectively compelled to attempt an examination she could not reasonably access. When she sought assistance from an examiner and the provost, she was told to "answer only what she could see," a statement that is demeaning, discriminatory, and wholly indefensible in law and ethics.

The Hospital bears responsibility for the actions and omissions of the School operating within its institutional framework. Your failure to prevent or address this discriminatory treatment is a breach of statutory duty and constitutes a clear violation of our Client's

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Damilola Victoria Alabi - **Co-opted Member**; Omolade Martha Ijeh - **NBA Liaison Officer**

constitutional right to dignity and freedom from discrimination. It also represents a blatant breach of the Discrimination Against Persons with Disabilities (Prohibition) Act, 2018, the Constitution of the Federal Republic of Nigeria, and other relevant laws that mandate public institutions to provide reasonable accommodations to persons with disabilities, particularly regarding access to education and examinations. The failures outlined were not accidental; they reflect a systemic and deliberate disregard for the rights of persons with disabilities.

As a result of these acts and omissions, our Client has suffered psychological trauma, public humiliation, loss of opportunity, and unlawful exclusion from an educational process for which she was otherwise qualified. The actions of officials within your institution have subjected her to humiliation, exclusion, and unlawful discrimination.

TAKE NOTICE that unless within thirty (30) days from receipt of this letter the Hospital:

1. Issues a written public apology to Ms. Uche Olivia, to be published on the Hospital's official platforms and in two (2) national dailies;
2. Pays ₦10,000,000.00 (Ten Million Naira only) as compensation; and
3. Commits in writing to institutional compliance with disability-inclusive standards,

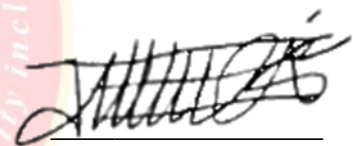
We will be compelled to initiate legal proceedings on behalf of our Client. This will include seeking declaratory reliefs, damages, injunctive orders, and ancillary reliefs in a competent court of law. This letter is intended to serve as proof of compliance with all statutory pre-action requirements.

Be assured of our esteem regards.

Yours faithfully,



PATIENCE N. ETUMUDON
Chairperson, NBA-LWDF



JUSTICE CHRISTOPHER
Chairman, Litigation Committee, NBA-LWDF
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