

IN THE HIGH COURT OF JUSTICE
EDO STATE OF NIGERIA
IN BENIN JUDICIAL DIVISION
HOLDEN AT BENIN CITY

BETWEEN:

HON GANI AUDU

AND

MARTINS VINCENT OTSE

**(USING THE NAME ONLINE VERYDARKMAN AND
VERYDARKBLACKMAN)**

CLAIMANT

DEFENDANT

WRIT OF SUMMONS

You are hereby commanded that within Six Months (6) months after service of the writ on you inclusive of the day of such service, you do cause an appearance to be entered for you in an action at the Suit of the Claimant and TAKE NOTICE that in default of your so doing, the Claimant may proceed therein and Judgment may be given in your absence.

Dated this _____ day of _____ 2026.

By Order of Court

.....
Registrar

MEMORANDUM TO BE SUBSCRIBED ON THE WRIT

NB: This Writ is to be served within six Calendar Months from the date thereof or if renewed, within three Calendar Months from the day of the last renewal, including the day of such date and not afterwards.

The Defendant may enter appearance personally or by a Legal Practitioner either by handing in the appropriate forms duly completed at the Registry of the High Court of the Judicial Division in which the action is brought or by sending them to the Registrar by registered post.

ENDORSEMENT OF THE WRIT OF SUMMONS

WHEREFORE, THE CLAIMANT CLAIMS AGAINST THE DEFENDANT AS FOLLOWS:

- 1. A DECLARATION** that the Defendant through his social media verified Facebook and Instagram pages with the name "Verydarkblackman" with over One Million Followers made defamatory remarks and comments against the Claimant through the video he posted on the 14th day of January, 2026.

IN THE HIGH COURT OF JUSTICE
EDO STATE OF NIGERIA
IN BENIN JUDICIAL DIVISION
HOLDEN AT BENIN CITY

SUIT NO:

B/58/2026

ETWEEN:

HON GANI AUDU

CLAIMANT

AND

**MARTINS VINCENT OTSE
(USING THE NAME ONLINE
VERYDARKMAN AND
VERYDARKBLACKMAN)**

DEFENDANT

CERTIFICATE OF PRE-ACTION COUNSELLING

I, **DOUGLAS OGBANKWA ESQ.**, representing the Claimant in this Suit have Counseled my Client on the strengths and weaknesses of their Cause or Matter, and informed him of the opportunities available for the Alternative Dispute Resolution of this case and the possibility of the reconciliation between the parties being affected either with or without assistant of each and other organization, and should this matter turn out to be frivolous, I am prepared to be liable as per the provisions of the Rules of Court.

Dated this 22nd day of January 2026.


Douglas Ogbankwa Esq.,
(Claimant's Counsel)
Douglas Ogbankwa Law Firm
17B, James Watt Road,
Benin City.
08070700176
douglasogbankwa@gmail.com

IN THE HIGH COURT OF JUSTICE
EDO STATE OF NIGERIA
IN BENIN JUDICIAL DIVISION
HOLDEN AT BENIN CITY

SUIT NO:

BETWEEN:
HON GANI AUDU

AND

MARTINS VINCENT OTSE (USING THE NAME
ONLINEVERYDARKMAN AND
VERYDARKBLACKMAN)

CLAIMANT

DEFENDANT

STATEMENT OF CLAIM

1. The claimant avers that he is the current Chief of Staff to the Edo state Governor – His Excellency, Governor Monday Okpebholo. **A Picture of his appointment being reported by punchng.com on the 15th day of November 2024 is hereby pleaded and shall be relied upon at the Trial.**
2. The claimant avers that before being the chief of staff to the Governor of Edo state he was a member of the Edo state House of Assembly, representing the Etsako west constituency.
3. The claimant avers that before he became a member of the Edo State House of Assembly, he was the chairman of Etsako west local Government Area of Edo state.
4. The claimant avers that in all these position of public trust he has demonstrated great statesmanship and he has been of exemplary conduct.
5. The Claimant avers that the defendant is an online content creator who creates content through diverse social media platforms.
6. The Claimant avers that on the 14th day of January 2026, the defendant made a video where he claimed that the Claimant called the DPO of Auchu Police Division, telling the DPO not to record the statement of Harrison Gwamnishu and also to allow Harrison Gwamnishu leave the police station.
7. The Claimant further avers that the Defendant also stated that the Claimant obstructed justice with his influence. In the Defendant's words **"Harrison called the Chief of Staff, Gani Audu, this is the Chief of Staff of**

IN THE HIGH COURT, EDO STATE OF NIGERIA
IN THE BENIN JUDICIAL DIVISION
HOLDEN AT BENIN CITY

B/00/283C/25
CHARGE No:

BETWEEN:

THE STATE
AND
MARY THEOPHILUS
HELEN IGHODARO

COUNT I:

That you MARY THEOPHILUS (f) and HELEN IGHODARO (f), between the 28th day of September, 2020 up till the 20th day of November, 2024, at Uyi Technical Nigeria Limited, Mission Road, Benin City, Edo State, in the Benin Judicial Division, did conspire amongst yourselves to commit a felony to wit: Stealing and thereby committed an offence punishable under Section 412 of the Criminal Law of Edo State, 2022.

COUNT II:

That you MARY THEOPHILUS (f) and HELEN IGHODARO (f), between the 28th day of September, 2020 up till the 20th day of November, 2024, at Uyi Technical Nigeria Limited, Mission Road, Benin City, in the Benin Judicial Division, did steal the sum of Two Five Million, Six Hundred and Forty Five Thousand, One Hundred and Fifty Six Naira (N25,645,156), properties of Uyi Technical Nigeria Limited, and thereby committed an offence punishable under Section 294 of the Criminal Law of Edo State, 2022.


U.A. OGEDENGBE Esq.
For: Attorney General,
Edo State.

IN THE HIGH COURT, EDO STATE OF NIGERIA
IN THE BENIN JUDICIAL DIVISION
HOLDEN AT BENIN CITY

B100/283C/25
CHARGE No:

BETWEEN:

THE STATE
AND
MARY THEOPHILUS
HELEN IGHODARO

COUNT I:

That you MARY THEOPHILUS (D) and HELEN IGHODARO (D), between the 28th day of September, 2020 up till the 20th day of November, 2024, at Uyi Technical Nigeria Limited, Mission Road, Benin City, Edo State, in the Benin Judicial Division, did conspire amongst yourselves to commit a felony to wit: Stealing and thereby committed an offence punishable under Section 412 of the Criminal Law of Edo State, 2022.

COUNT II:

That you MARY THEOPHILUS (D) and HELEN IGHODARO (D), between the 28th day of September, 2020 up till the 20th day of November, 2024, at Uyi Technical Nigeria Limited, Mission Road, Benin City, in the Benin Judicial Division, did steal the sum of Twenty Five Million, Six Hundred and Forty Five Thousand, One Hundred and Fifty Six Naira (N25,645,156), properties of Uyi Technical Nigeria Limited, and thereby committed an offence punishable under Section 294 of the Criminal Law of Edo State, 2022.


U.A. OGEDENGBE Esq.
For: Attorney General,
Edo State.

The Claimant avers that in proof of the fact that the video made by the Defendant was/is a calculated attempt to destroy the reputation and good standing of the Claimant in the minds of right-thinking members of the public, both within and outside Nigeria, the Defendant had the Claimant's picture displayed on the screen the whole time while making the video and the derogatory remarks against the Claimant.

15. The Claimant avers that he has suffered huge psychological trauma as a result of the video and the derogatory remarks made by the Defendant against him.

16. The Claimant further avers that he has suffered huge economical losses and setbacks as a result of financial expenses incurred by the Claimant to manage the consequences of the mental torture that the Defendant has by his derogatory comments against the Claimant, made the Claimant to go through.

17. The Claimant avers that the relationship with family and friends has suffered huge setbacks as they now tend to distance themselves from him due to the malicious defamatory remarks made by the Defendant against him.

18. The Claimant avers that unless the Defendant is adequately made to take the consequences of making defamatory remarks against innocent citizens of the federal republic of Nigeria, he will continue to make such remarks and put people in perpetual pains and agony as a result of his false and malicious remarks.

19. **WHEREFORE, THE CLAIMANT CLAIMS AGAINST THE DEFENDANT AS FOLLOWS:**

a. **A DECLARATION** that the Defendant through his social media verified Facebook and Instagram pages with the name "Verydarkblackman" with over One Million Followers did make defamatory remarks against the Claimant through the video he posted on the 14th day of January 2026.

b. An Order of this Honourable Court, compelling the Defendant to pay the sum of ₦500, 000, 000.00K (Five Hundred Million Naira) only, to the Claimant as damages for the injury done to the Claimant's reputation and integrity, as a result of the Defendant's Defamatory remarks against the Claimant.

c. An Order of this Honourable Court compelling the Defendant to publish an apology on two National Dailies and all his social media handles, containing a retraction of the defamatory remarks made by the Defendant against the Claimant.

Governor Monday Okpebholo, present Governor of Edo State. So he called this one, this one now told the DPO that he should let Harrison go. So if not for this man now, Harrison, we for don lock am. All these things when dey happen online, una for no even see am. So it is the Chief of staff, na him know the relationship when two of them get. That Chief of Staff self, you need to be investigated, because you obstructed justice, you obstructed the law with your influence, you obstructed justice and you obstructed the law. As a Chief of Staff of Edo State, this kind thing happen, them say person steal, the person say e no steal, eventually the person brought the money, you go know the kind person when e be, but the Chief of Staff said, okay, let Harrison go". A copy of the said video made by the Defendant is hereby pleaded and shall be relied upon at the trial.

8. The Claimant avers that the remarks made by the Defendant against him in the said video are all false and derogatory.
9. The Claimant avers that he wrote a letter through his solicitor to the defendant, demanding that the defendant retract the defamatory video on his Facebook and Instagram social media platforms, but the Defendant failed, refused and/or neglected to retract the said defamatory video. **The said letter dated the 14th day of January 2026 is hereby pleaded and shall be relied upon at the trial.**
10. The Claimant avers that he downloaded the video with his Samsung Galaxy Fold Phone during a period over which the Samsung Galaxy Fold phone was used regularly to store and process information. **A Certificate of Compliance with Section 84 of the Evidence Act is hereby pleaded the trial.**
11. The Claimant avers that all through the years of him holding diverse public positions, there has never been any time on record that he perverted the course of justice, as he had always carried out his lawful duties and responsibilities with sheer diligence and uprightness.
12. The Claimant avers that the video made by the Defendant was a calculated attempt by the Defendant to damage the reputation and good standing of the Claimant which he has painstakingly built over the years.
13. The Claimant avers that there was no particular point in time that he interfered with police investigation of one Harrison Gwamnishu or any person whatsoever as he does not have the legal powers to interfere with any police investigation.

2. An Order of this Honourable Court, compelling the Defendant to pay the sum of N=500, 000, 000.00K (Five Hundred Million Naira) only, to the Claimant as damages for the injury done to the Claimant's reputation and integrity, as a result of the Defendant's Defamatory remarks against the Claimant.
3. An Order of this Honourable Court compelling the Defendant to publish an apology on two National Dailies and all his social media handles, containing a retraction of the defamatory remarks made by the Defendant against the Claimant.
4. **AN ORDER** of Perpetual Injunction restraining the Defendant, his Agents, Servants Assigns, Privies or any person connected to him howsoever, from further making any defamatory publication against the Claimant.
5. Any other Equitable Reliefs.

This Writ was issued by Douglas Ogbankwa Esq, of Douglas Ogbankwa Law Firm of 17t James Watt Road, Benin City, for the said Claimant, who is of the Office of the Chief of Sta to the Edo State Governor, Edo State Government House, Dennis Osadebey Avenue, G.R./ Benin City, Edo State.

This writ was served by me at.....on the Defendant (inse mode of service) on the.....day of, 2026.

ENDORSED the.....day of 2026.

Signed:



Douglas Ogbankwa Esq.,
(Claimant's Counsel)
Douglas Ogbankwa Law Firm
7B, James Watt Road,
Benin City.
08070700176
douglasogbankwa@gmail.com

FOR SERVICE ON:
THE DEFENDANT,
House D4, White Diamond Estate,
Makuru Street off Embu Street, Aminu Kano,
Wuse II,
Federal Capital Territory,
Abuja.

File - 500
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Claim - 10,500

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SERVICE ON:

THE DEFENDANT,

House D4, White Diamond Estate,
Makuru Street off Embu Street, Aminu Kano,
Wuse II,
Federal Capital Territory,
Abuja.

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