

IN THE HIGH COURT OF ANAMBRA STATE OF NIGERIA
IN THE HIGH COURT OF OGBARU JUDICIAL DIVISION
HOLDEN AT ATANI

SUIT NO: AT/TS/2026

A11273m126

BETWEEN:

4. HIGH CHIEF RAPHAEL AGU
5. COMRADE OBUMNAEKE OHIAGU
6. ANAYO OJINNAKA
(FOR THEMSELVES AND ON BEHALF OF THE
CONCERNED LANDLORDS AND TENANTS/RESIDENTS
OF OKPOKO COMMUNITY)

PLAINTIFFS

AND

5. CHIEF CHARLES EZEOKAFOR
6. CHIEF IKECHUKWU UNOGU
7. UGOCHUKWU ONYEGUIRI
(FOR THEMSELVES AND ON BEHALF OF THE
EXECUTIVE MEMBERS OF OKPOKO COMMUNITY
DEVELOPMENT UNION)
8. ONYEBUCHI OBI
(CHAIRMAN OF OKPOKO
CENTRAL LANDLORDS ASSOCIATION,
OKPOKO COMMUNITY)
5. MR. EMEKA OMIRE
(CHAIRMAN OKPOKO PROPERTY
OWNERS ASSOCIATION)

DEFENDANTS

MOTION ON NOTICE BROUGHT PURSUANT TO ORDER 3 RULE 1
OF THE HIGH COURT (CIVIL PROCEDURE) RULES 2019
ANAMBRA STATE AND THE COURT'S INHERENT JURISDICTION

1. **AN ORDER OF INTERLOCUTORY INJUNCTION** restraining the Defendants whether acting by themselves, or through their Servants, Agents, Privies, or Workmen, from taking any further Step to implement the unilateral increased Security/Vigilante Levy of ₦400.00 per tenant/resident pending the hearing and final determination of the substantive suit in this matter.
2. **AN ORDER OF INTERLOCUTORY INJUNCTION** restraining the Defendants whether acting by themselves, Servants, Agents, Privies, or Workmen, from invading in a Commando style, the Premises of the Plaintiffs and other Residents of Okpoko Community to demand the payment of the contested ₦400.00 Security/Vigilante Levy pending the hearing and final determination of the substantive suit in this matter.

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(CHAIRMAN OKPOKO PROPERTY
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DEFENDANTS

WRIT OF SUMMONS

1. You are hereby commanded that within forty-two days after the service of this 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 (1) HIGH CHIEF RAPHAEL AGU, (2) COMRADE OBUMNAEKE OHIAGU, and (3.) ANAYO OJINNAKA and take notice that in default of your so doing, the plaintiff may proceed therein, and judgment may be given in your absence.

Dated this 17th day of August, 2026.

.....
REGISTRAR



3. **AN ALTERNATIVE ORDER OF INTERLOCUTORY INJUNCTION** directing PARTIES in this Suit to maintain **Status quo ante bellum** pending the hearing and final determination of the substantive Suit in this matter.

4. **AND FOR such wider order** (s) as the Honourable Court may deem fit to make.

Dated at Atani this 17th day of August, 2026.

ADDRESS OF SERVICE:

1ST – 3RD DEFENDANTS OKPOKO
COMMUNITY DEVELOPMENT
UNION SECRETARIAT, OKPOKO
OGBARU LGA.

4TH – 5TH DEFENDANTS
OKPOKO COMMUNITY

A. G. OGBACHALU Esq., ACIarb(UK) ALD
A.C Onah Esq., FIAHRC
Georgian Ogechi Opara LL.M (London)
P.U Okereke Esq.,
AIG DR. T.J OGUNSAKIN (RTD) ESQ., LL.M
GINALEXI SOLICITORS - LP
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pd on case
1742524
18/08/26





GOSHEN LAWLORDS SOLICITORS

INTERNATIONAL BUSINESS AND INVESTMENT ATTORNEYS
SOLICITORS & ADVOCATES OF THE SUPREME COURT OF NIGERIA

(GOSHEN LAWLORDS SOLICITORS)
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PRINCIPAL COUNSEL: ABUCHI GOSHEN OGBACHALU, ESQ, BMTC (NIGERIAN ARMY), LL.B(HONS) LL.M (DUBLINMET) B.L., ACIarb(UK), PAMB., ALD., HDMA

18th Aug., 2026

Messrs:

The Divisional Police Officer
Nigeria Police Force
Okpoko Divisional Headquarters
Anambra State.

AND

The President General
Okpoko Community
Okpoko, Anambra State.

RE: FORMAL NOTICE AND DEMAND TO DESIST FROM FURTHER DEMAND, COLLECTION OR ENFORCEMENT OF SECURITY LEVY FROM LANDLORDS, TENANTS AND RESIDENTS OF OKPOKO PENDING THE HEARING OF THE MOTION NO:AT/273M/2026 AND DETERMINATION OF THE PENDING SUIT BEFORE THE OGBARU JUDICIAL DIVISION

Our Professional Services are still retained by Messrs :

1. High Chief Raphael Agu
2. Comrade Obumnaeke Ahiagu
3. Anayo Ojinnaka(For Themselves and on behalf of the Concerned Landlords and Tenants/Residents of Okpoko Community) whom are Plaintiffs in **Suit No: AT/ 75 /2026 and Motion No:AT/273/2026** hereinafter referred to as ("Our Clients") and write on their behalf in respect of the above matter.



CONSULTANTS
ASSOCIATE SOLICITORS

AIG. T.J OGUNSAKIN (RTD) ESQ.BA. (HONS) LL.B., BL ACIARB (UK)
DR. K.R IDRIS ESQ. BA., MA., (ILLINOIS, CHICAGO,IL) JURIST DOCTOR (NORTHERN ILLINOIS, DEKALB,IL);
A.E EZEAMALUKWE ESQ.,B.SC., LL.B (HONS) UNICAL, B.L., CHARLES NAANLONG PUEPET ESQ. B.Sc.(Econs),LL. B., I
N.D DIMU ESQ. LL.B (HONS) MSC, LL.M, CAMEROON, B.L;
J.O DUROJAIYE ESQ. LL.B (HONS) NORTHAMPTON, LL.M, ROBERT GORDON, B.L;
C.W IWUCHUKWU ESQ. LL.B (HONS), MIDDLESEX, B.L, ACIarb; Y.K.ELI ESQ. LL.B (HONS) B.L;
O.M. ANURUEGBE ESQ. B.A, LL.B (HONS) COVENTRY, LL.M, QMU-LONDON, B.L;
O.M. ADEOLU ESQ. LL.B (HONS) GUA-CYPRUS, B.L; D.T.TANGO ESQ. LL.B(HONS) UOY II CAMEROON,ML CORP GOV.BL;
A.C UKACHUKWU ESQ., LL.B (HONS) LONDON, LL.M (COVENTRY) CIPD
K.A ISHMAEL ESQ. DIP. BTEC HNC (LONDON) LL.B (HONS) WALES CARDIFF, LL.M (LONDON SOUTH BANK) B.L

5. The Police should maintain their constitutional and statutory neutrality and should not permit the machinery of the Nigeria Police Force to be used to determine, enforce or resolve what is substantially a matter presently before the Honourable Court.

For the avoidance of doubt, this letter is not intended to interfere with the lawful functions of the Nigeria Police Force in preventing or investigating genuine criminal offences. Rather, it is a formal demand that the Police should not be used as an instrument for coercive collection or enforcement of a disputed levy which is the subject of pending judicial proceedings.

TAKE NOTICE that should the demand, collection or enforcement of the Security Levy continue after receipt of this letter, our Clients shall, without further correspondence, take such further legal steps as may be necessary to protect their rights and interests, including seeking appropriate consequential orders from the Honourable Court.

Our Clients shall further seek appropriate orders and remedies against any person, body or authority found to have participated in or facilitated any unlawful interference with the subject matter of the pending proceedings.

We therefore urge you to exercise the necessary restraint and ensure that the status quo is preserved pending the determination of the suit before the Ogbaru Judicial Division.

Kindly treat this letter as a formal notice and demand to desist.

Yours faithfully,

AIG T.J OGUNSAKIN (RTD.) ESQ., ACIarb(UK) LL.M(LONDON) LL.D
A G OGBACHALU ESQ., ACIarb(UK) ALD
M.N NWIBE ESQ.
(Plaintiffs Solicitors)

Find attached the said Suits.

Cc:

1. The Assistant Inspector General of Police
The Nigeria Police Force
Zone 13 Zonal Headquarters -Ukpo
2. The Director Department of State Services
Anambra State Command
3. The Anambra State Chapter of Nigerian Union of Journalists
4. Chidiebere Anasiudu Esq 98 Limca road Nkpor(Defendants Legal Adviser/Counsel)
5. The Registrar, High Court of Justice ,Ogbaru Judicial Division.

Above for your information and necessary action please.



Our Clients' attention has been drawn to the continued demand and/or proposed Security/Vigilante Levy drive with effect from tomorrow the 18th August 2026 by the Executives of Okpoko Community Development Union represented by Chief Charles Ezeokafor and persons acting for, or allegedly acting with the authority of, the Okpoko Community Development Union with the backing of armed Security Men.

We hereby formally bring to your attention that there is a pending suit before the High Court of Anambra State, Ogbaru Judicial Division, concerning issues connected with the said levy and/or the authority, legality and propriety of demanding and collecting same from landlords, tenants and residents of Okpoko.

The matter is presently sub judice, and the rights and obligations of the parties in respect of the subject matter are yet to be finally determined by the Honourable Court.

In the circumstances, you are hereby placed on formal notice that any further demand, collection, enforcement, threat, coercion, intimidation or other step calculated to compel landlords, tenants and residents of Okpoko to pay the said Security Levy, pending the determination of the suit, may amount to an attempt to alter the status quo and/or render the outcome of the pending proceedings nugatory.

DEMAND TO MAINTAIN STATUS QUO

Accordingly, our Clients hereby demand that:

1. The Divisional Police Officer, Okpoko Police Division, and the Nigeria Police Force, Okpoko Divisional Headquarters, desist from participating in, facilitating, enforcing or lending police authority to any demand or collection of the said Security Levy pending the determination of the pending suit.
2. The President General of Okpoko Community, together with all officers, agents, committees, representatives and persons acting under his authority, desist from making further demands for the payment of the Security Levy by landlords, tenants and residents of Okpoko pending the determination of the suit.
3. No landlord, tenant or resident of Okpoko should be subjected to threats, harassment, intimidation, arrest, invitation, detention, eviction, restriction, denial of community services or any other adverse consequence merely because of a refusal to pay the disputed levy, particularly where the issue is presently before the Honourable Court.
4. All parties and persons acting on their behalf should maintain the status quo ante and refrain from taking any step capable of prejudicing the rights of the parties or interfering with the subject matter of the pending proceedings.