IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/2837/2026.

IN THE MATTER OF THE INTERPRETATION AND APPLICATION OF SECTIONS 1(1), 1(3), 36(1), 35(2), 46, 150 AND 174 OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, 1999 (AS AMENDED).

AND

IN THE MATTER OF THE INTERPRETATION AND APPLICATION OF SECTIONS 1(1), 1(2), 6(2), 15(4), 17(1) AND 17(2) OF THE ADMINISTRATION OF CRIMINAL JUSTICE ACT, 2015.

AND

IN THE MATTER OF THE LAWFUL EXERCISE OF THE PROFESSIONAL FUNCTIONS, DUTIES AND RESPONSIBILITIES OF A LEGAL PRACTITIONER IN NIGERIA.

BETWEEN:

GODSPOWER EROGA, ESQ.....APPLICANT

AND

1. THE STATE SECURITY SERVICE (SSS) -
2. THE ATTORNEY-GENERAL OF THE FEDERATION } **RESPONDENTS**

ORIGINATING SUMMONS

LET THE RESPONDENTS, within the time prescribed by the Rules of this Honourable Court after service of this Summons on them, cause an appearance to be entered for them to this Summons, which is issued upon the application of GODSPOWER EROGA, ESQ., the Applicant herein, for the determination of the following questions:

FEDERAL HIGH COURT
ABUJA
17 NOV 2026
PAID
CASHIER

30W463629G8

QUESTIONS FOR DETERMINATION:

QUESTION ONE.

Whether having regard to sections 1(1) and 1(3) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), the 1st Respondent, being a Federal Government security agency, possesses the legal authority to impose an administrative requirement that a legal practitioner must first submit a written application and obtain the approval of the Director-General of the 1st Respondent before being permitted to have access to a client detained in its custody.

QUESTION TWO.

Whether the insistence by the officers and operatives of the 1st Respondent that the Applicant must submit a written application and await the approval of the Director-General before having access to his detained clients, without any prescribed statutory procedure, definite timeline or reasonable determination of the application, does not constitute an unreasonable administrative obstruction of the Applicant's professional functions and duties as a legal practitioner.

QUESTION THREE

Whether the refusal and/or failure of the 1st Respondent to grant the Applicant access to his clients, after repeated visits and the submission of a formal application dated 13th November 2026, without communicating any lawful reason for the continued refusal, is not inconsistent with the constitutional and statutory safeguards established under sections 35(2) of the Constitution and sections 6(2) and 17(2) of the Administration of Criminal Justice Act, 2015.

QUESTION FOUR.

Whether the 1st Respondent, being an agency involved in criminal investigation and the administration of criminal justice, is not under a statutory obligation pursuant to sections 1(1) and 1(2) of the Administration of Criminal Justice Act, 2015, to conduct its investigative activities in a manner that gives effect to the rights of suspects to consult legal practitioners of their choice and to have such practitioners present during statement-taking where the suspect so elects.

QUESTION FIVE.

Whether the 1st Respondent can lawfully rely on an internal administrative approval procedure to frustrate or defeat the operation of section 17(2) of the Administration of Criminal Justice Act, 2015, which recognises the right of a

suspect to have a legal practitioner of his choice present during the taking of his statement.

QUESTION SIX.

Whether the 1st Respondent's insistence on prior approval from its Director-General, where such insistence is applied as an absolute or indefinite condition for legal access, is not arbitrary, unreasonable and inconsistent with the rule of law and the constitutional obligation of all public authorities to act within the limits of the law.

QUESTION SEVEN.

Whether the 2nd Respondent, having regard to sections 150 and 174 of the Constitution and section 105 of the Administration of Criminal Justice Act, 2015, ought not to take such lawful steps as are within the constitutional and statutory responsibilities of his office to ensure that the 1st Respondent's criminal investigation activities comply with the Constitution and the applicable provisions of the Administration of Criminal Justice Act.

RELIEFS SOUGHT:

WHEREOF; the Applicant seeks the following reliefs:

1. A DECLARATION that the Applicant, being a legal practitioner duly called to the Nigerian Bar and entitled to practise law in Nigeria, is entitled to carry out his lawful professional functions, including providing legal advice, consultation and representation to persons who have lawfully engaged his professional services.

2. A DECLARATION that the 1st Respondent, in the exercise of its investigative and security functions, is bound by the Constitution of the Federal Republic of Nigeria, 1999 (as amended), and the applicable provisions of the Administration of Criminal Justice Act, 2015.

3. A DECLARATION that the imposition of a blanket administrative condition requiring the Applicant, as a legal practitioner, to submit a written application and obtain the approval of the Director-General of the 1st Respondent before being permitted to consult with a client in the custody of the 1st Respondent, where such condition operates to

indefinitely deny or unreasonably delay legal consultation, is unlawful, unreasonable and inconsistent with the constitutional and statutory safeguards governing the administration of criminal justice.

4. A DECLARATION that the 1st Respondent cannot lawfully use an internal administrative procedure to defeat, suspend or frustrate the right of a detained suspect to consult with a legal practitioner of his choice, as recognised under section 35(2) of the Constitution and section 6(2) of the Administration of Criminal Justice Act, 2015.

5. A DECLARATION that the refusal and/or failure of the 1st Respondent to grant the Applicant access to his clients after repeated visits and the submission of a formal written application dated 13th November 2026, without communicating a reasonable and lawful justification for the refusal, constitutes an unreasonable interference with the Applicant's lawful professional functions.

6. A DECLARATION that the 1st Respondent is under an obligation to administer its detention and interrogation procedures in a manner that gives effect to section 17(2) of the Administration of Criminal Justice Act, 2015, including the right of a suspect to have a legal practitioner of his choice present during the taking of his statement where the suspect so elects.

7. A DECLARATION that the Applicant's professional responsibility to advise and represent a client who has engaged his services cannot be subjected to an arbitrary, indefinite or unexplained administrative approval process which defeats the purpose of legal consultation.

8. AN ORDER directing the 1st Respondent, its officers, agents, servants and operatives to desist from imposing an arbitrary or indefinite administrative approval requirement as a condition for the Applicant to exercise his lawful professional functions in relation to clients detained in its custody.

9. AN ORDER directing the 1st Respondent to establish and apply a reasonable, transparent and time-bound procedure for verifying the identity and authority of legal practitioners seeking access to persons in its custody, which shall not operate as an arbitrary or indefinite barrier to legal consultation.

10. AN ORDER directing the 1st Respondent to grant the Applicant reasonable professional access to clients who have lawfully engaged his services and

are detained in its custody, subject to reasonable security arrangements, verification of professional identity and confirmation of the client's willingness to consult with him.

11. AN ORDER restraining the 1st Respondent, whether by itself, its officers, servants, agents or privies, from arbitrarily denying or indefinitely delaying the Applicant's access to clients detained in its custody solely on the ground that an application for approval has not been granted by the Director-General.

12. AN ORDER directing the 1st Respondent to ensure compliance with the relevant provisions of the Administration of Criminal Justice Act, 2015, particularly sections 6(2), 15(4) and 17(2), in the course of the investigation and taking of statements from suspects in its custody.

13. AN ORDER directing the 2nd Respondent, in the exercise of the powers and responsibilities vested in his office under section 105 of the Administration of Criminal Justice Act, 2015, and other applicable laws, to take such lawful steps as are within his competence to promote compliance by the 1st Respondent with the Constitution and the Administration of Criminal Justice Act.

14. AND FOR SUCH FURTHER OR OTHER ORDERS as this Honourable Court may deem fit to make in the circumstances of this case.

Dated this 16th November, 2026.

MICHAEL OKPERIN, ESQ.
IFIOKOBONG ETIM BEN, ESQ.
Counsel to the Applicant
GP-CHAMBERS & CO
Suite 3, First Floor, ZM Plaza,
Plot 1490, Ahmadu Bello Way,
Between First Bank and GT Bank Plc,
Opposite Inneh Mic Auto, Area 11,
Garki, FCT, Abuja.
08078856164

FOR SERVICE ON THE RESPONDENTS:
1ST RESPONDENT.

The State Security Service,
Aso Drive, Asokoro,
FCT, Abuja.

2ND RESPONDENT.
The Attorney-General of the Federation,
C/o Director of Civil Litigation,
Department of Civil Litigation,
Federal Ministry of Justice,
FCT, Abuja.

IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
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SUIT NO: FHC/ABJ/CS/2837/2026.

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AND

IN THE MATTER OF THE LAWFUL EXERCISE OF THE PROFESSIONAL FUNCTIONS, DUTIES AND RESPONSIBILITIES OF A LEGAL PRACTITIONER IN NIGERIA.

BETWEEN:

GODSPOWER EROGA, ESQ.....APPLICANT

AND

1. THE STATE SECURITY SERVICE (SSS) -
2. THE ATTORNEY-GENERAL OF THE FEDERATION } **RESPONDENTS**

STATEMENT SETTING OUT THE NAME AND DESCRIPTION OF THE APPLICANT, RELIEFS SOUGHT AND GROUNDS.

1. The Applicant is Godspower Eroga, Esq., a legal practitioner duly called to the Nigerian Bar and entitled to practise as a Barrister and Solicitor of the Supreme Court of Nigeria.
2. The Applicant carries on legal practice at Suite 3, First Floor, ZM Plaza, Plot 1490, Ahmadu Bello Way, Between First Bank and GT Bank Plc, Opposite Inneh Mic Auto, Area 11, Garki, FCT, Abuja.

3. The Applicant was duly briefed to provide legal representation and pursue administrative bail for two clients who were arrested and detained by officers and operatives of the 1st Respondent at its facility situated at Aso Drive, Asokoro, FCT, Abuja.
4. Upon accepting the briefs, the Applicant, together with his professional colleagues, Michael Okperin, Esq., and Ifiokobong Etim Ben, Esq., made several visits to the detention facility of the 1st Respondent to obtain access to their clients for the purpose of legal consultation and representation.
5. On the occasions of the visits, officers of the 1st Respondent refused to grant the Applicant and his colleague access to the detained persons, insisting that a formal written application must first be submitted and approved by the Director-General of the 1st Respondent.
6. Consequently, a formal written application dated 13th November 2026 was submitted to the Director-General of the Department of State Services, seeking legal access and administrative bail for one of the Applicant's clients.
7. The said application was acknowledged as received on 13th November 2026 at approximately 12:32 p.m. However, several days after its submission, the Applicant received no response, invitation, approval or communication granting access to the client.
8. The Applicant contends that the conduct of the 1st Respondent amounts to an unreasonable administrative interference with his professional functions and creates a system whereby the ability of a legal practitioner to discharge his professional duties is made dependent upon the unexplained discretion of an investigating agency.
9. The Applicant further contends that the statutory provisions governing criminal investigations do not authorise the 1st Respondent to frustrate the right of a suspect to consult with a legal practitioner of his choice through an indefinite administrative approval procedure.

GROUNDS UPON WHICH THIS APPLICATION IS BROUGHT

1. The Applicant is a legal practitioner duly called to the Nigerian Bar and entitled to practise law in Nigeria.

2. The Applicant has a legitimate professional interest in being able to discharge his professional duties towards clients who have engaged his services.

3. The 1st Respondent is a Federal Government security agency responsible for internal security and the investigation of offences affecting the internal security of Nigeria.

4. The powers of the 1st Respondent are subject to the Constitution and applicable laws.

5. Section 35(2) of the Constitution guarantees an arrested or detained person the right to remain silent until after consultation with a legal practitioner or another person of his choice.

6. Section 6(2) of the ACJA recognises the right of a suspect to consult a legal practitioner of his choice before making, endorsing or writing any statement or answering questions after arrest.

7. Section 17(2) of the ACJA provides for the presence of a legal practitioner of the suspect's choice during the taking of a statement, where the suspect so elects.

8. The 1st Respondent's insistence on prior administrative approval, when applied as an indefinite condition for legal access, frustrates the effective implementation of the foregoing statutory safeguards.

9. The Applicant and his colleagues made repeated visits to the detention facility of the 1st Respondent but were denied access to their clients.

10. The Applicant's professional colleague submitted a written application dated 13th November 2026, which was acknowledged by the 1st Respondent.

11. The 1st Respondent failed to respond to the application or communicate any reasonable justification for its continued refusal to grant access.

12. The 1st Respondent cannot lawfully use its internal administrative procedures to defeat or render nugatory the constitutional and statutory safeguards governing the administration of criminal justice.

13. The 2nd Respondent is the Chief Law Officer of the Federation and has statutory responsibilities under section 105 of the ACJA in relation to legal advice and directives to law enforcement agencies.

14. This Honourable Court has the jurisdiction to interpret and determine the legality of the administrative practice complained of and to grant appropriate declaratory and consequential reliefs.

Dated this 16th November, 2026.

MICHAEL OKPERIN, ESQ.
IFIOKOBONG ETIM BEN, ESQ.
Counsel to the Applicant
GP-CHAMBERS & CO
Suite 3, First Floor, ZM Plaza,
Plot 1490, Ahmadu Bello Way,
Between First Bank and GT Bank Plc,
Opposite Inneh Mic Auto, Area 11,
Garki, FCT, Abuja.
08078856164

FOR SERVICE ON THE RESPONDENTS:
1ST RESPONDENT.
The State Security Service,
Aso Drive, Asokoro,
FCT, Abuja.

2ND RESPONDENT.
The Attorney-General of the Federation,
C/o Director of Civil Litigation,
Department of Civil Litigation,
Federal Ministry of Justice,
FCT, Abuja.

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IN THE MATTER OF THE LAWFUL EXERCISE OF THE PROFESSIONAL FUNCTIONS, DUTIES AND RESPONSIBILITIES OF A LEGAL PRACTITIONER IN NIGERIA.

BETWEEN:

GODSPOWER EROGA, ESQ.....APPLICANT

AND

1. THE STATE SECURITY SERVICE (SSS) -
2. THE ATTORNEY-GENERAL OF THE FEDERATION } **RESPONDENTS**

AFFIDAVIT IN SUPPORT

I, GODSPOWER EROGA, Male, Adult, Nigerian Citizen, Legal Practitioner, of Suite 3, First Floor, ZM Plaza, Plot 1490, Ahmadu Bello Way, Between First Bank and GT Bank Plc, Opposite Inneh Mic Auto, Area 11, Garki, FCT, Abuja, do hereby make oath and state as follows:

1. That I am the Applicant in this suit, a legal practitioner called to the Nigerian Bar and entitled to practise as a Barrister and Solicitor of the

Supreme Court of Nigeria. Attached herein and marked as **EXHIBIT GP-1** is the Bar Practicing Fee receipt of the Applicant.

2. That I am conversant with the facts and circumstances giving rise to this action by virtue of my personal involvement in the events complained of.

3. That I carry on legal practice at Suite 3, First Floor, ZM Plaza, Plot 1490, Ahmadu Bello Way, Between First Bank and GT Bank Plc, Opposite Inneh Mic Auto, Area 11, Garki, FCT, Abuja.

4. That sometime in November 2026, I was professionally briefed to provide legal representation and pursue administrative bail for two clients who had been arrested and detained by officers and operatives of the 1st Respondent.

5. That the said clients were taken into the custody of the 1st Respondent and detained at its facility situated at Aso Drive, Asokoro, FCT, Abuja.

6. That upon accepting the professional briefs, I undertook to provide the necessary legal advice, representation and other legal services required by the clients in relation to their arrest, detention and investigation.

7. That in the course of discharging my professional responsibilities, I proceeded to the detention facility of the 1st Respondent alongside my professional colleagues, Michael Okperin, Esq., and Ifiokobong Etim Ben, Esq.

8. That the purpose of our visit was to gain access to our clients for purposes of legal consultation, ascertainment of their welfare and the provision of legal advice and representation.

9. That upon our arrival at the facility of the 1st Respondent, we presented ourselves to the officers at the front desk and identified ourselves as legal practitioners duly instructed to represent persons detained by the 1st Respondent.

10. That we requested to be allowed to see our clients in order to discharge our professional obligations towards them.

11. That the officers at the front desk refused to grant us access to the detained persons.

12. That the officers informed us that we could not be allowed to see our clients unless a written application was first submitted and approved by the Director-General of the 1st Respondent.

13. That we explained to the officers that we were legal practitioners duly briefed to represent the detained persons and that our request was for the purpose of legal consultation and representation.

14. That notwithstanding our explanation, the officers maintained that we must first obtain the approval of the Director-General before any access could be granted.

15. That we subsequently made further visits to the facility of the 1st Respondent on different dates and at different times in an effort to obtain access to our clients.

16. That on each occasion, the officers continued to insist that a written application must first be submitted and approved by the Director-General before we could be allowed access.

17. That the insistence of the officers placed me in a position where the performance of my professional duties as counsel depended upon an administrative approval that was neither prescribed by any law disclosed to us nor communicated within any definite period.

18. That the refusal of access prevented me from obtaining direct instructions from my clients, discussing the circumstances of their arrest and detention with them, and providing timely legal advice.

19. That following the repeated refusal of access, my professional colleague, Michael Okperin, Esq., prepared a formal application addressed to the Director-General of the Department of State Services.

20. That the said application was dated 13th November 2026 and titled "Application for Legal Access and Administrative Bail for Akponiseigha Ekoi Osuobeni Esq."

21. That the application requested immediate legal access to the client to enable counsel ascertain his welfare, understand the circumstances surrounding his arrest and provide legal representation during interrogation or statement-taking.

22. That the application also requested administrative bail on liberal and reasonable terms pending the conclusion of the investigation.

23. That the said application was received and acknowledged by the office of the 1st Respondent on 13th November 2026 at approximately 12:32 p.m.

24. That a copy of the application dated 13th November 2026 as well as the 16th of November 2026, bearing the acknowledgement of receipt by the 1st Respondent, is attached hereto and marked as **EXHIBIT GP 2 & GP 3** respectively.

25. That notwithstanding the acknowledgement of the application, several days passed without any response, approval, invitation or communication from the 1st Respondent.

26. That the failure of the 1st Respondent to respond to the application left me unable to discharge my professional responsibilities towards the client whose legal access had been requested.

27. That I verily believe that the insistence upon prior approval of the Director-General, when applied as an indefinite condition for access, is unreasonable and constitutes an improper administrative obstacle to the performance of the lawful functions of a legal practitioner.

28. That I am aware that section 35(2) of the Constitution guarantees an arrested or detained person the right to remain silent or avoid answering questions until after consultation with a legal practitioner or another person of his choice.

29. That I am also aware that sections 6(2) and 17(2) of the Administration of Criminal Justice Act, 2015, recognise the right of a suspect to consult with a legal practitioner of his choice and to have such practitioner present during the taking of his statement where he so elects.

30. That I verily believe that the 1st Respondent's conduct, as described above, is inconsistent with the constitutional and statutory safeguards governing criminal investigation and has materially obstructed my ability to discharge my lawful professional functions as a legal practitioner.

31. That I have brought this action solely to challenge the administrative practice and conduct of the 1st Respondent as it affects the lawful performance of my professional duties and responsibilities as counsel.

32. That I am not asking this Honourable Court in this action to determine the guilt or innocence of any person under investigation or to interfere with any lawful investigation being undertaken by the 1st Respondent.

33. That I respectfully seek the interpretation of the relevant constitutional and statutory provisions and appropriate orders restraining the 1st Respondent from imposing arbitrary or indefinite administrative barriers to legal consultation.

34. That I depose to this affidavit conscientiously believing the facts stated herein to be true and correct and in accordance with the Oaths Act.

.....

DEPONENT

SWORN TO at the Federal High Court Registry, Abuja,

This 14th day of Nov 2026.

COMMISSIONER FOR OATHS
FEDERAL HIGH COURT
ABUJA
Sign.....

BEFORE ME:

COMMISSIONER FOR OATHS

Exh GP-"1"

SUPREME COURT OF NIGERIA

OFFICE OF THE CHIEF REGISTRAR
Three Arms Complex, Central District, PMB 308, Abuja

Payment Receipt

NATIONAL SECRETARIAT
NBA House, Plot 1101 Mohammadu,
Buhari Way, Centeral Business District,
Abuja, F.C.T Nigeria

nigerianbar.org.ng
info@nigerianbar.org.ng
+234-800-33-111

COMMISSIONER FOR OATHS
FEDERAL HIGH COURT
ABUJA
Sign.....
Date.....

Payment date: 2026-01-01T01:33:48.000Z
Payment Reference:
714972810207310

PAYER INFORMATION	
Name	GODSPOWER OGHONEVWEGBA EROGA,
Payee Branch	Garki
Enrollment No.	SCN101281
Email	gpchamber888@gmail.com
Year of Call	2015

PAYMENT DETAILS

PAYMENT DATE	PAYMENT REF.	PAYMENT DESCRIPTION	AMOUNT ₦	CHARGES ₦	VAT ₦	TOTAL ₦
2026-01-01T01:33:48.000Z	714972810207310	Bar Practicing Fee	17500	0.00	0.00	17500

PAYMENT CHANNEL INFORMATION

TRANSITION	STATUS	PAYMENT TYPE	PAYMENT YEAR	BILLING METHOD
NBA Portal	Successful	BPF	2026	FLUTTERWAV

Exh GP-"3"

MIKE OKPERIN LEGAL CONSULT

BARRISTERS, SOLICITORS & NOTARY PUBLIC
BLOCK B, SUITE 74/75,
EFAB SHOPPING COMPLEX, AREA 11, GARKI ABUJA
07067441184/08111984626

Monday,
16th November, 2026

COMMISSIONER FOR OA
FEDERAL HIGH COU
ABUJA
Sign.....
Date.....

Received by
Abuisha
16/11/26 12:49pm

The Director-General,
Department of State Services (DSS),
National Headquarters,
Aso Drive,
Abuja, FCT.

Dear Sir,

RE: URGENT REMINDER ON APPLICATION FOR ACCESS AND ADMINISTRATIVE BAIL FOR AKPONISEIGHA EKOI OSUOBENI ESQ. ON MEDICAL GROUNDS.

We write as legal counsel to Akponiseigha Ekoi Osuobeni Esq. (hereinafter referred to as "our Client"), who is currently in the custody of your esteemed Service.

Recall that on Friday, 13th November 2026, our Chambers submitted a formal letter addressed to your office and duly acknowledged at the DSS National Headquarters, Aso Drive, Abuja. In the said correspondence, we formally requested access to our Client in line with his constitutional right to legal representation, as well as his release on administrative bail pending the conclusion of your investigation.

Regrettably, despite the acknowledgment of our letter, we are yet to receive any response or directive from your office regarding access to our Client or his bail application.

Sir, this delay has become deeply worrisome and urgent due to our Client's deteriorating health condition. Our Client suffers from a chronic medical illness that requires specialized care and has a scheduled medical appointment with his physician in Germany on the 19th November 2026. Consequently, he urgently needs to be granted access to his legal and medical teams, and admitted to administrative bail to enable him to finalize his travel arrangements and attend this critical appointment.

In view of the constitutional guarantee of the right to personal liberty, dignity of the human person, and access to counsel under Sections 34, 35, and 36 of the 1999 Constitution of the Federal Republic of Nigeria (as amended), as well as the provisions of the Administration of Criminal Justice Act (ACJA) 2015, we respectfully urge your good office to treat this reminder with the utmost urgency it deserves.

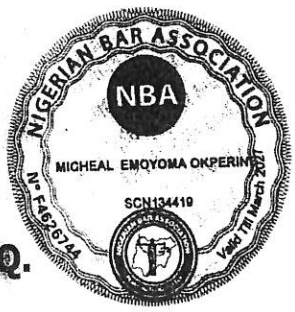
We reiterate our request for:

1. Immediate access for his legal counsel, Barr. Mike Okperin, to consult with our Client; and

2. The prompt grant of administrative bail to our Client on reasonable terms to enable him to attend to his urgent medical appointment in Germany.

While we anticipate your prompt and favorable response, please accept the assurances of our highest professional regards.

Yours faithfully,
for Mike Okperin Legal Consult.



MICHAEL EMOYOMA OKPERIN, ESQ.
Counsel to

Encl:
Copy of the acknowledged letter dated 13th November 2026.
Copy of the medical appointment to Germany is attached.

ST. JOSEFS-HOSPITAL WIESBADEN

Akademisches Lehrkrankenhaus der Johannes Gutenberg-Universität Mainz

Zentrum für Orthopädie, Wirbelsäule und Unfallchirurgie

Wirbelsäulenzentrum
Chefärzte Dr. med. univ. Philipp Hartung
Prof. Dr. med. Marcus Richter

Ansprechpartner Chefarztsekretariat
Telefon (0611) 177-3707
Telefax (0611) 177-3702
Email chefarztsekretariat-wsz@joho.de

Datum 01.10.2026

INVITATION LETTER

TO WHOM IT MAY CONCERN

Dear Sir or Madam,

Patient:	**Mr. Osuobeni, Akponimisingha Ekoi**	**DoB: 27.05.1979**
Passportno:	**B50027465**	
Acc. Person:	**Mrs. Akponimisingha, Eunice Tormo**	**DoB: 28.03.1987**
Passportno:	**B50027447**	

The above mentioned patient will be admitted to the hospital on

Thursday, 19-November-2026 at 08:30 a. m

The appointment is very important from a medical point of view after the Surgery 12.08.2026.

Diagnosis:

1) Unco- foraminal stenosis C6/7 bilateral with compression of the C7 roots bilateral and radiculopathy C7 bilateral
2) Osteochondrosis, spondylarthritis and spondylosis C5/7

There is still a credit balance remaining from the inpatient stay, so the anticipated costs are covered.

We look forward to the patient's attendance.

Prof. Dr. med. Marcus Richter
Head of Spine Centre

Prof. Dr. med. Marcus Richter
Chefarzt des Wirbelsäulenzentrums
St. Josefs-Hospital
Wiesbaden GmbH
Beethovenstr. 20
65189 Wiesbaden

EXH GP-"2"

MIKEOKPERINLEGALCONSULT

**BARRISTERS, SOLICITORS & NOTARY PUBLIC BLOCK B,
SUITE 74/75, EFAB SHOPPING COMPLEX,
AREA11, GARKIABUJA 07067441184/08111984626**

COMMISSIONER FOR OATHS
FEDERAL HIGH COURT
ABUJA
Sign.....
Date.....

13th November, 2026

The Director-General,
Department of State Services (DSS),
National Headquarters,
Aso Drive, Maitama,
Abuja, FCT.

Received by
13/11/26
12:32pm

Attention: The Director of Legal Services
/ The Investigating Officer.

Dear Sir,

APPLICATION FOR LEGAL ACCESS AND ADMINISTRATIVE BAIL FOR AKPONISEIGHA EKOI OSUOBENI ESQ

We act as Legal Practitioners to Mr. Akponiseigha Ekoi Osuobeni Esq (hereinafter referred to as "our Client"), on whose express instruction and behalf we write this letter.

It has been brought to our professional attention that our Client was arrested and taken into the custody of your esteemed Service yesterday, 12th November, 2026, at Abuja.

Pursuant to our Client's constitutional right to personal liberty and legal representation of his choice as enshrined in Sections 35 and 36 of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), as well as the relevant provisions of the Administration of Criminal Justice Act (ACJA), 2015, we respectfully apply for the following:

1. Immediate Legal Access: An urgent audience with our Client to ascertain his welfare, understand the circumstances surrounding his arrest, and provide him with legal representation during any interrogation or statement-taking process.

2. Administrative Bail: The grant of administrative bail to our Client on liberal and reasonable terms pending the conclusion of your investigation, as we are prepared to provide credible and reliable sureties who will ensure his attendance whenever required by your Service.

We hold your Service in high esteem and trust that you will treat this application with the urgency it deserves in line with the rule of law and due process.

Please accept the assurances of our highest professional regards.

Yours faithfully,



MICHAEL YOMA OKPERIN Esq.
Principal
07067441184/08111984626

IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/2837/2026.

IN THE MATTER OF THE INTERPRETATION AND APPLICATION OF SECTIONS 1(1), 1(3), 36(1), 35(2), 46, 150 AND 174 OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, 1999 (AS AMENDED).

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AND

IN THE MATTER OF THE LAWFUL EXERCISE OF THE PROFESSIONAL FUNCTIONS, DUTIES AND RESPONSIBILITIES OF A LEGAL PRACTITIONER IN NIGERIA.

BETWEEN:

GODSPOWER EROGA, ESQ.....APPLICANT

AND

1. THE STATE SECURITY SERVICE (SSS) -
2. THE ATTORNEY-GENERAL OF THE FEDERATION } **RESPONDENTS**

APPLICANT'S WRITTEN ADDRESS IN SUPPORT OF THE ORIGINATING SUMMONS

1.0 INTRODUCTION

1.1. This Written Address is filed in support of the Applicant's Originating Summons seeking the interpretation of the constitutional and statutory provisions governing the exercise of investigative powers by the 1st

Respondent and the extent to which the 1st Respondent may lawfully regulate access by legal practitioners to persons detained in its custody.

1.2. The Applicant is a legal practitioner duly called to the Nigerian Bar and practicing within the Federal Capital Territory, Abuja.

1.3. The Applicant was professionally briefed to provide legal representation and pursue administrative bail for two clients arrested and detained by the 1st Respondent at its facility at Aso Drive, Asokoro, Abuja.

1.4. In the course of discharging his professional obligations, the Applicant, alongside his professional colleagues, Michael Okperin, Esq., and Ifiokobong Etim Ben, Esq., visited the detention facility of the 1st Respondent on different dates and at different times to obtain access to their clients.

1.5. On each occasion, the officers of the 1st Respondent refused to grant access and insisted that a written application must first be submitted and approved by the Director-General of the 1st Respondent.

1.6. Following the refusal, a formal application dated 13th November 2026 was submitted to the Director-General of the Department of State Services. The application was acknowledged as received on the same date at approximately 12:32 p.m.

1.7. However, despite the passage of several days, no approval, response or communication was received from the 1st Respondent.

1.8. The Applicant contends that the practice complained of constitutes an unreasonable administrative restriction upon his ability to discharge his lawful professional functions and undermines the statutory safeguards established under the Administration of Criminal Justice Act, 2015.

1.9. The Applicant does not challenge the lawful authority of the 1st Respondent to investigate offences or protect national security. Rather, the Applicant challenges the introduction and application of an administrative approval requirement in a manner that operates to prevent or indefinitely delay legal consultation.

2.0 ISSUES FOR DETERMINATION

The Applicant respectfully adopts the questions formulated in the Originating Summons and submits that the principal issue for determination is:

2.1. Whether the 1st Respondent can lawfully insist that a legal practitioner must submit a written application and obtain the approval of the Director-General before being permitted to discharge his professional functions in relation to a client detained in its custody, where such administrative procedure operates to deny or indefinitely delay access to legal consultation, having regard to sections 35(2) of the Constitution and sections 1(1), 1(2), 6(2), 14(2) and (3), and 17(2) of the Administration of Criminal Justice Act, 2015.

3.0. ARGUMENT.

THE CONSTITUTION IS SUPREME AND ALL FEDERAL GOVERNMENT AGENCIES, INCLUDING THE SSS, ARE BOUND BY ITS PROVISIONS.

3.1. My Lord, the starting point of this argument is section 1(1) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), which provides that the Constitution is supreme and its provisions shall have binding force on all authorities and persons throughout the Federal Republic of Nigeria.

Section 1(3) further provides that any law which is inconsistent with the provisions of the Constitution shall be void to the extent of its inconsistency.

3.2. The implication of these provisions is that no Federal Government agency can exercise its powers in a manner inconsistent with the Constitution. The 1st Respondent, notwithstanding its sensitive national security responsibilities, is not exempted from constitutional accountability. In Military *Governor of Lagos State v. Ojukwu (1986) 1 NWLR (Pt. 18) 621,* the Supreme Court emphasised the centrality of the rule of law in the Nigerian constitutional order. The Court underscored that government must act within the framework of recognised legal rules and principles and cannot substitute arbitrary executive action for lawful procedure.

3.3. The Applicant submits that the principle in Ojukwu's case applies with equal force to the administrative practices of the 1st Respondent.

An agency cannot introduce an internal procedure and use that procedure to defeat a statutory entitlement or constitutional safeguard.

3.4. The Applicant acknowledges that the 1st Respondent may regulate entry into its premises for legitimate security purposes. It may verify the identity of legal practitioners, confirm their professional status, ascertain the authority under which they seek access and adopt reasonable arrangements for the protection of its facilities. However, such security arrangements must remain reasonable and proportionate. They cannot be transformed into an unrestricted discretion to deny a legal practitioner access to a client indefinitely.

3.5. The Applicant respectfully submits that the distinction is between the legitimate regulation of access and the arbitrary obstruction of legal consultation.

The former is permissible; the latter is inconsistent with the rule of law.

4.0. THE INSISTENCE ON PRIOR APPROVAL FROM THE DIRECTOR-GENERAL MUST BE CONSIDERED AGAINST SECTION 35(2) OF THE CONSTITUTION.

4.1. Section 35(2) of the Constitution provides:

"Any person who is arrested or detained shall have the right to remain silent or avoid answering any question until after consultation with a legal practitioner or any other person of his own choice."

4.2. My Lord, the provision is a deliberate constitutional safeguard against compelled statements, oppressive interrogation and the denial of access to legal advice. The provision does not merely recognise a detained person's ability to remain silent. It expressly contemplates consultation with a legal practitioner as the means through which the detained person may obtain advice before deciding whether to answer questions.

4.3. The Applicant submits that a constitutional right to consultation cannot be made illusory by an administrative procedure that allows the investigating agency to withhold access indefinitely. Where the detaining authority

insists that counsel must first apply to the Director-General and await approval, the practical effect is that access to legal advice becomes dependent upon the unexplained discretion of the detaining authority. This is particularly concerning where the detained person may be subjected to interrogation or requested to make a statement while the application for legal access remains unanswered. The Applicant does not contend that section 35(2) gives every lawyer an unconditional right to enter a security facility. Rather, the Applicant submits that where a detained person wishes to exercise the constitutional right to consult counsel, the authority holding that person cannot defeat that right through an unreasonable or indefinite administrative barrier.

4.4. **In General Sani Abacha & Ors v. Chief Gani Fawehinmi (2000) 6 NWLR (Pt. 660) 228,** the Supreme Court examined the exercise of powers by the State Security Service in the context of the constitutional protection of personal liberty and the rule of law. The decision is relevant for the proposition that the 1st Respondent's security functions remain subject to constitutional control and judicial scrutiny. The Applicant therefore urges this Honourable Court to hold that the 1st Respondent's administrative practices must be interpreted and applied consistently with section 35(2) of the Constitution.

5.0. SECTION 6(2) OF THE ADMINISTRATION OF CRIMINAL JUSTICE ACT EXPRESSLY RECOGNISES THE RIGHT OF A SUSPECT TO CONSULT A LEGAL PRACTITIONER OF HIS CHOICE.

5.1. My Lord, the Administration of Criminal Justice Act, 2015, was enacted to ensure an efficient criminal justice system while protecting the rights and interests of suspects, defendants and victims.

Section 1(1) of the Act provides that its purpose includes the protection of the rights and interests of suspects, defendants and victims.

Section 1(2) further provides:

"The courts, law enforcement agencies and other authorities or persons involved in criminal justice administration shall ensure compliance with the provisions of this Act for the realisation of its purposes."

The provision is significant because it expressly places law enforcement agencies under an obligation to comply with the Act.

The 1st Respondent cannot claim exemption from the statutory requirements merely because it is a security intelligence agency.

Furthermore, section 6(2) of the Act provides that the arresting authority shall inform the suspect of his right to:

a. Remain silent or avoid answering any question until after consultation with a legal practitioner or any other person of his choice;

b. Consult a legal practitioner of his choice before making, endorsing or writing any statement or answering any question put to him after arrest; and

c. Free legal representation by the Legal Aid Council of Nigeria where applicable.

d. The significance of this provision is that the legislature expressly recognises the right of a suspect to obtain legal advice before making a statement or answering questions.

5.2. The Applicant submits that the statutory recognition of the right to consult a legal practitioner cannot be reconciled with a practice that permits the investigating authority to indefinitely withhold access to the legal practitioner selected by the suspect. The Applicant is not suggesting that the Act expressly abolishes every administrative procedure for access to a security facility.

5.3. Rather, the Applicant submits that any such procedure must be administered in a manner that gives practical effect to the right recognised under section 6(2). An administrative procedure cannot lawfully become a mechanism for frustrating the very right which the legislature intended to protect.

6.0. SECTION 14(2) OF THE ACJA PLACES A POSITIVE DUTY ON THE AUTHORITY HAVING CUSTODY TO PROVIDE REASONABLE FACILITIES FOR LEGAL ADVICE.

6.1. My Lord, the Applicant respectfully draws the attention of this Honourable Court to section 14(2) of the ACJA, which provides:

> **"A person who has the custody of an arrested suspect shall give the suspect reasonable facilities for obtaining legal advice, access to communication for taking steps to furnish bail, and otherwise making arrangements for his defence or release."**

6.2. The provision is directly relevant to the present action.

6.3. The legislature has imposed a positive statutory obligation upon the authority having custody of an arrested suspect to provide reasonable facilities for obtaining legal advice.

6.4. The provision does not merely prohibit the use of force against a suspect. It requires the authority holding the suspect to facilitate the process by which the suspect obtains legal advice.

6.5. Section 14(3) further provides that communication or legal advice contemplated under section 14(2) shall take place in the presence of an officer having custody of the arrested suspect.

6.6. This is important because it demonstrates that the legislature anticipated legitimate security concerns and provided a means of accommodating those concerns without completely denying access to legal advice.

6.7. The presence of a custodial officer allows the authority to maintain reasonable security supervision while the suspect obtains legal advice.

6.8. Consequently, the 1st Respondent cannot justify an absolute refusal of access on the ground that its facility is a security installation.

6.9. The law already recognises a procedure through which legal consultation can take place under reasonable security supervision.

6.10. The Applicant therefore submits that a blanket requirement for approval from the Director-General, where applied to prevent or indefinitely delay access, defeats the purpose of section 14(2) of the ACJA.

7.0. SECTION 17(2) OF THE ACJA RECOGNISES THE PRESENCE OF A LEGAL PRACTITIONER DURING THE TAKING OF A SUSPECT'S STATEMENT.

7.1. My Lord, the Applicant further relies on section 17(2) of the ACJA, which provides:

> **"Such statement may be taken in the presence of a legal practitioner of his choice, or where he has no legal practitioner of his choice, in the presence of an officer of the Legal Aid Council of Nigeria or an official of a Civil Society Organization or a Justice of the Peace or any other person of his choice."**

7.2. The provision recognizes the importance of legal representation during the taking of statements from suspects.

7.3. The Applicant submits that the 1st Respondent cannot create an administrative arrangement that makes the exercise of this statutory safeguard dependent upon an indefinite approval process.

7.4. Where a suspect elects to have a legal practitioner present during statement-taking, the relevant investigating authority must respect the statutory safeguards.

7.5. It is important to distinguish section 17(2) from section 15(4).

7.6. Section 15(4) provides for the recording of a confessional statement in writing and permits electronic audio-visual recording. Section 17(2) specifically addresses the presence of a legal practitioner or another specified person during statement-taking.

7.7. The Applicant relies principally on sections 6(2), 14(2) and 17(2) in challenging the administrative barrier complained of.

7.8. The Applicant is not asking the Court to prevent the 1st Respondent from carrying out lawful interrogation. He seeks only to ensure that such interrogation is undertaken in accordance with the statutory safeguards.

7.9. THE APPLICANT'S PROFESSIONAL FUNCTIONS MUST NOT BE ARBITRARILY OBSTRUCTED BY AN ADMINISTRATIVE PRACTICE THAT HAS NO IDENTIFIED STATUTORY BASIS.

7.10. My Lord, a legal practitioner accepts instructions from clients and assumes professional obligations arising from those instructions.

7.11. Such obligations include providing legal advice, obtaining necessary instructions, advising on the consequences of statements, explaining legal rights and taking lawful steps to protect the interests of the client.

7.12. The Applicant was briefed by two clients to provide legal representation and pursue administrative bail.

7.13. In furtherance of those briefs, he visited the facility of the 1st Respondent with his professional colleagues.

7.14. Instead of being granted reasonable access subject to verification and security arrangements, the Applicant was informed that an application had to be submitted and approved by the Director-General.

7.15. The Applicant complied with that administrative demand by submitting a formal application dated 13th November 2026.

7.16. The application was acknowledged as received, but no response or approval was communicated. The Applicant submits that an administrative process that requires a legal practitioner to make an application but provides no reasonable timeframe for determination and no effective avenue for addressing an unexplained refusal is capable of frustrating the discharge of professional duties.

7.17. The issue before this Honourable Court is not whether the Director-General may supervise security arrangements at the facility.

7.18. The issue is whether such administrative supervision can lawfully be exercised in a manner that defeats the operation of the statutory safeguards

governing legal consultation. The Applicant respectfully submits that it cannot.

7.19. THE 2ND RESPONDENT HAS STATUTORY RESPONSIBILITIES UNDER SECTION 105 OF THE ACJA TO ISSUE LEGAL ADVICE AND DIRECTIVES TO LAW ENFORCEMENT AGENCIES.

7.20. My Lord, the Applicant has joined the 2nd Respondent because the office of the Attorney-General of the Federation occupies a central position in the administration of criminal justice.

7.21. Section 150(1) of the Constitution establishes the office of the Attorney-General of the Federation as the Chief Law Officer of the Federation.

7.22. Section 174(1) vests the Attorney-General with constitutional prosecutorial powers in respect of offences created by Acts of the National Assembly.

7.23. More importantly, section 105 of the ACJA provides:

> **"The Attorney-General of the Federation may issue legal advice or such other directive to the Police or any other law enforcement agency in respect of an offence created by an Act of the National Assembly."**

7.24. The provision is particularly relevant to this action because it expressly recognises the Attorney-General's authority to issue legal advice or directives to law enforcement agencies in relation to offences created by Acts of the National Assembly.

7.25. The Applicant submits that the 2nd Respondent has a statutory role in promoting lawful criminal justice administration and ensuring that the exercise of investigative powers conforms to applicable legislation.

7.26. The Applicant is not asking this Honourable Court to make the Attorney-General the operational head of the 1st Respondent.

7.27. Neither is the Applicant asking the Attorney-General to interfere with the legitimate intelligence-gathering responsibilities of the 1st Respondent.

7.28. The Applicant seeks only an appropriate order requiring the 2nd Respondent to take such lawful steps as fall within the powers of his office to promote compliance with the Constitution and the ACJA.

7.29. The Applicant submits that the 2nd Respondent's statutory responsibilities under section 105 provide a proper legal foundation for the relief sought against that office.

7.30. **THE COURT IS EMPOWERED TO DECLARE THE LEGAL LIMITS OF ADMINISTRATIVE POWERS EXERCISED BY FEDERAL GOVERNMENT AGENCIES.**

7.31. My Lord, section 6(6)(b) of the Constitution vests judicial powers in the courts to determine questions concerning the civil rights and obligations of persons.

7.32. Furthermore, section 251(1)(r) confers jurisdiction on the Federal High Court in civil causes and matters connected with or pertaining to the administration or management and control of the Federal Government or any of its agencies.

7.33. The 1st Respondent is a Federal Government security agency, and the subject matter of this action concerns the legality of an administrative practice adopted in the exercise of its functions.

7.34. The Applicant respectfully submits that this Honourable Court has jurisdiction to determine whether the administrative practice complained of is consistent with the applicable constitutional and statutory provisions.

7.35. In **A.G. Lagos State v. A.G. Federation (2004) 18 NWLR (Pt. 904) 1,** the Supreme Court discussed the constitutional limits of governmental powers and the importance of resolving disputes within the framework of the Constitution.

7.36. The Applicant further relies on Military Governor of Lagos State v. Ojukwu (1986) 1 NWLR (Pt. 18) 621, for the principle that the exercise of governmental powers must conform to the rule of law. The Applicant submits that where a public authority adopts an administrative practice that allegedly conflicts with statutory obligations, the Court is entitled to interpret the relevant laws and determine the limits of the authority's

powers. The Applicant therefore urges this Honourable Court to resolve the questions formulated in this Summons in his favour.

8.0. CONCLUSION.

8.1. My Lord, this action raises an important question concerning the relationship between the legitimate security responsibilities of the State Security Service and the lawful professional functions of legal practitioners.

8.2. The Applicant recognizes that the 1st Respondent has statutory responsibilities relating to internal security, intelligence gathering and the investigation of offences.

8.3. However, those responsibilities must be exercised within the framework of the Constitution and applicable legislation.

8.4. The Applicant and his colleagues were repeatedly denied access to their clients on the ground that an application must first be submitted and approved by the Director-General of the 1st Respondent.

8.5. The application was eventually submitted and acknowledged on 13th November 2026, but no response or approval was communicated despite the passage of several days.

8.6. The Applicant respectfully submits that the 1st Respondent cannot use an internal administrative procedure to create an indefinite barrier to legal consultation, particularly where the Constitution and the ACJA expressly recognise the importance of access to legal advice and representation.

8.7. The Applicant is not seeking to interfere with lawful investigations or the security responsibilities of the 1st Respondent. He seeks only to ensure that such responsibilities are exercised within the limits of the law.

8.8. We therefore respectfully urge this Honourable Court to answer the questions formulated in this Originating Summons in favour of the Applicant and grant the reliefs sought.

Respectfully submitted.

Dated this 16th November, 2026.

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FOR SERVICE ON THE RESPONDENTS:
1ST RESPONDENT.
The State Security Service,
Aso Drive, Asokoro,
FCT, Abuja.

2ND RESPONDENT.
The Attorney-General of the Federation,
C/o Director of Civil Litigation,
Department of Civil Litigation,
Federal Ministry of Justice,
FCT, Abuja.

LIST OF AUTHORITIES.

A. JUDICIAL AUTHORITIES.

1. Military Governor of Lagos State v. Ojukwu (1986) 1 NWLR (Pt. 18) 621 (SC).
   Principle: Governmental powers must be exercised in accordance with the rule of law.
2. General Sani Abacha & Ors v. Chief Gani Fawehinmi (2000) 6 NWLR (Pt. 660) 228 (SC).
   Principle: The exercise of powers by the State Security Service remains subject to constitutional safeguards and judicial scrutiny.
3. A.G. Lagos State v. A.G. Federation (2004) 18 NWLR (Pt. 904) 1 (SC).
   Principle: Constitutional limitations on governmental powers and the supremacy of the Constitution.

2. STATUTORY AUTHORITIES.

1. Constitution of the Federal Republic of Nigeria, 1999 (as amended):
   Section 1(1) and (3).
   Section 35(2).
   Section 36(1), where applicable.
   Section 150(1).
   Section 174(1).
   Section 251(1)(r).
   Section 6(6)(b).

2. Administration of Criminal Justice Act, 2015:
   Section 1(1) and (2).
   Section 6(1) and (2).
   Section 14(1), (2) and (3).
   Section 15(4).
   Section 17(1) and (2).
   Section 105.
   Section 494.
3. National Security Agencies Act, Cap. N74, Laws of the Federation of Nigeria, 2004, particularly section 2(3).

4. Federal High Court (Civil Procedure) Rules, 2019, provisions relating to commencement of civil proceedings by Originating Summons.

IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/...../2026.

IN THE MATTER OF THE INTERPRETATION AND APPLICATION OF SECTIONS 1(1), 1(3), 36(1), 35(2), 46, 150 AND 174 OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA, 1999 (AS AMENDED).

AND

IN THE MATTER OF THE INTERPRETATION AND APPLICATION OF SECTIONS 1(1), 1(2), 6(2), 15(4), 17(1) AND 17(2) OF THE ADMINISTRATION OF CRIMINAL JUSTICE ACT, 2015.

AND

IN THE MATTER OF THE LAWFUL EXERCISE OF THE PROFESSIONAL FUNCTIONS, DUTIES AND RESPONSIBILITIES OF A LEGAL PRACTITIONER IN NIGERIA.

BETWEEN:

GODSPOWER EROGA, ESQ.....APPLICANT

AND

1. THE STATE SECURITY SERVICE (SSS) -
2. THE ATTORNEY-GENERAL OF THE FEDERATION } **RESPONDENTS**

AFFIDAVIT OF NON-MULTIPLICITY OF ACTION.

I, GODSPOWER EROGA, Male, Adult, Nigerian Citizen, Legal Practitioner, of Suite 3, First Floor, ZM Plaza, Plot 1490, Ahmadu Bello Way, Area 11, Garki, FCT, Abuja, do hereby make oath and state as follows:

1. That I am the Applicant in this suit and I am conversant with the facts giving rise to this action.

2. That this action concerns the administrative practice of the 1st Respondent requiring legal practitioners to submit written applications and obtain the approval of the Director-General before being granted access to clients detained in its custody.

3. That this action is brought solely in my professional capacity to challenge the alleged obstruction of my lawful professional functions as a legal practitioner.

4. That I have not instituted any other suit before this Honourable Court or any other court seeking substantially the same reliefs against the Respondents on the same facts and circumstances.

5. That I have not filed any other action seeking the interpretation of the same administrative practice complained of in this suit.

6. That this action is brought in good faith and is not intended to constitute an abuse of court process, forum shopping or multiplicity of actions.

7. That I depose to this affidavit conscientiously believing the facts stated herein to be true and correct and in accordance with the Oaths Act.

.....

DEPONENT

SWORN TO at the Federal High Court Registry, Abuja,

This 14 day of Nov 2026.

BEFORE ME:

COMMISSIONER FOR OATHS
FEDERAL HIGH COURT
ABUJA
Sign.....
Date.....

COMMISSIONER FOR OATHS