



Time limitations in electoral justice in Nigeria: Issues and prospects

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Abstract

This article examines the time limitations in electoral justice delivery in Nigeria and the need to balance same with uncompromised justice delivery in the electoral litigation process in Nigeria. The article analysed the time limitation in election litigations in Nigeria, and its impact on electoral justice delivery and human rights protection in Nigeria with the view to proposing measures towards achieving effective determination of election disputes. The article employed the doctrinal methodology in examining relevant case law, constitutional provisions, statutory frameworks and existing knowledge in literature in election litigation in Nigeria. The article revealed that time limitations in election litigation in Nigeria has compromised electoral justice and human rights protection. The study recommended that section 185 of the Constitution of the Federal Republic of Nigeria should be amended to provide for exceptional circumstances on the 180 days limitation period of electoral litigation in Nigeria.

Keywords: Democracy, judiciary, justice, electoral disputes and judicial activism

Introduction

The conduct of free and fair elections is a cornerstone of democratic governance, ensuring that the will of the people is accurately reflected in the outcome of elections. Electoral justice delivery, which encompasses the adjudication of election-related disputes, plays a crucial role in ensuring the legitimacy and credibility of democratic processes. The will of the people is the foundation of legitimacy, and elected representatives derive their authority from the mandate secured through elections^[1]. However, the efficacy of electoral justice delivery is often challenged by various factors, including time limitations, which has made it difficult for election petitioners to get justice in electoral disputes. This is particularly pertinent in Nigeria, where electoral disputes are characterised by complex legal issues, the need for timely resolution is paramount.

The 2018 Fourth Alteration to the 1999 Constitution of Nigeria introduced significant changes to Nigeria's electoral process, particularly pre-election and election matters. Section 285 of the Constitution of the Federal Republic of Nigeria, 1999^[2], outlines the procedures and timelines for commencing and concluding these matters. While these timeframes for the filing and determination of electoral disputes are resolved expeditiously, they have also limited the parties to fully present their cases, and for the courts to thoroughly consider the complex legal and factual issues that often arise in electoral disputes^[3].

Sadly, the strict interpretation of these constitutional provisions has led to the dismissal of numerous cases with strong factual and evidentiary foundations, solely due to technicalities. Furthermore, legal practitioners facilitating this subversion of the will of the people by employing delay tactics, such as filing of frivolous objections, evasion of court processes, and frustration of the inspection of the INEC documents, has also potentially undermined the

efficacy of the judicial process^[4]. The rigidity of this approach has raised questions about the balance between adhering to statutory timeframes and ensuring justice is served. This is where judicial activism comes in.

Judicial activism represents a dynamic and evolving aspect of the judiciary's role in shaping the legal landscape, often blurring the lines between adjudication and legislation^[5]. Judicial activism refers to instances where judges depart from strict textual interpretations of laws and constitutional provisions, instead embracing a purposive or progressive approach to decision-making^[6]. It is commonly marked by decisions calling for social engineering, and occasionally, these decisions are to promote justice and protect the rights of citizens^[7]. This phenomenon has played a crucial role in advancing constitutionalism, human rights, and democratic governance, particularly in cases where the executive and legislative arms have failed to uphold justice or address pressing societal issues^[8]. This approach contrasts with judicial restraint, which advocates for a strict, textual application of laws and a deference to the legislature and executive in policy matters^[9].

Therefore, this article seeks to examine the priority in speeding-up election litigation and the effect of it on the justice system in Nigeria, with a view to identifying potential reforms that can promote electoral justice in Nigeria. By analysing relevant case law, statutory provisions, and judicial decisions, this research aims to identify the challenges and prospect associated with time limitation in the Nigerian electoral litigation process. It concludes with recommendation which if implemented would balance the need to speed-up electoral process in Nigeria without sacrificing justice for same.

Conceptual Framework

This section provides an overview of the key concepts

underpinning the research. Thus, the following concepts would be defined or explained: democracy, judiciary, general election, and judicial activism.

1. Democracy

Democracy is an idea that comes from two Greek words: 'Demos', which stands for 'the people', and 'Kratia', which means 'to rule' or 'govern'. According to the Black's Law Dictionary ^[10], democracy means 'a style of governance where the ultimate authority belongs to and is used by all the independent citizens, either directly or through a representative system, unlike monarchy, aristocracy, or oligarchy'. This explanation is too broad because it doesn't specify or clarify the type of representative system that allows people to use their ultimate authority. Can a government that uses a system of appointments and selections, which might meet this description, be considered a democracy? No.

A well-known explanation of democracy comes from Abraham Lincoln, who described it as a system where the government is run by the citizens, for the citizens, and of the citizens ^[11]. At the same time, this explanation does not identify the individuals involved (either the minority or the majority) and does not detail how this government functions. In his view, Schattschneider describes democracy as 'a system where political rivals and groups create options for public policy, allowing the public to engage in making decisions' ^[12]. In this definition, emphasis is laid more on leaders than the people.

2. Judiciary

The judiciary can be described as a network of legal courts and the judges who work in them ^[13]. This explanation, in this sense, covers anyone officially selected to preside over a case or matter within the formal ambit of the court. It essentially refers to the judicial system of a nation.

3. Electoral Justice

The concept of electoral justice carries so many meanings. A legal luminary, McLoughlin ^[14] had once observed that:

all aspects of the electoral process including the quality of electoral, civil and other political rights integral to the electoral process; the resolution of disputes related to elections; the identification and punishment of electoral-related wrongdoings; the identification and correction of irregularities related to the electoral process; in all possible cases, the provision of remedies to restore the integrity of the electoral process.

Electoral fairness is the final phase of the election procedure. It involves safeguarding political rights that are essential for a strong democracy, including the right to cast a vote and to stand for election; the equal voting rights for both genders; the freedom to join groups and organisations; personal safety rights; the ability to engage in public matters; and the right to seek help for grievances ^[15].

Electoral fairness is crucial in the election process. According to Omoregie ^[16], he noted that:

Electoral justice essentially places an obligation on all stakeholders to adhere to the rule of law and due processes, including guarantees of effective remedy,

judicial independence, institutional accountability, integrity and impartiality of state apparatuses especially the electoral management body (EMB) and security agencies directly associated with elections, and upholding of fundamental freedoms, particularly those with direct bearing on justice (such as fair hearing and the rule against bias).

In summary, looking at it from the perspective of strengthening democracy, fairness in elections are seen as a crucial element of how elections are managed. This includes the activities involved in creating laws, applying those rules, and resolving disputes that are essential to protect the election process and prevent conflicts related to elections ^[17]. The connection between fairness in elections and democracy is clear. Because elections are a key part of democracy, properly conducted elections that meet the standards of fairness are crucial for allowing the people to have power over the government ^[18]. Based on the above, electoral justice refers to the honest and unbiased enforcement of voting rules and standards to maintain the honesty of the voting system.

4. Electoral Disputes

Electoral disputes are conflicts or disagreements that arise during the electoral process, encompassing issues like voter registration, ballot qualification and vote tabulation. As defined by Black's Law Dictionary, electoral disputes are problems or arguments that occur during the voting process. These can involve matters such as registering voters, qualifications for ballots, registering political parties, and counting votes ^[19]. The Oxford Advanced Learner's Dictionary of Current English, defines disputes 'as to question whether something is true and valid' ^[20]. Electoral Dispute refers to a disagreement, discussion, or argument that happens during the election process to choose new leaders when the current ones finish their terms. It involves issues that arise from how an election is carried out and managed.

5. Judicial Activism

Judicial Activism is the philosophical aspect of the law where judges play a hands-on part in understanding legal rules, frequently going outside usual limits to support fairness and safeguard rights. This method is very different from judicial restraint, where judges tend to rely on lawmakers and focus on a limited view of laws. The term judicial activism brings out various meanings and opinions in legal discussions ^[21].

Electoral Litigation in Nigeria

Electoral litigation is a means of enforcing electoral laws in Nigeria, and also to redress electoral wrongs, sanction electoral offenders, and consolidate electoral process. Election petition is the means to inquire into the validity of election results and enabling individuals to challenge the election of a candidate ^[22]. Election petitions are unique and stand alone; they are fundamentally different from civil cases because they do not address the civil rights and responsibilities of the individuals involved ^[23]. The Supreme Court of Nigeria in *Abiwe v INEC*, ^[24] differentiated election petition and other civil proceedings with the following words:

It is well settled that an election petition is a proceeding which is sui generis, being of its kind, possessing, an individualistic character; which is unique and like only to itself. It is unlike ordinary civil proceedings and governed by its own unique civil constitutional and statutory provisions.

Electoral lawsuits in Nigeria are essential for protecting the fairness of elections. They offer a legal way to resolve complaints and conflicts that come up from election events, including unfair practices, wrongdoings, and breaches of election laws. The role of the courts in resolving this election-related dispute is important for upholding the stability of democracy.

A combined reading of sections 285(5), (6) of the Constitution of the Federal Republic of Nigeria, 1999 (CFRN) and sections 130(1) and 136(1) of the Electoral Act, 2022 establish the framework for election petitions, outlining the jurisdiction and process for hearing and determining electoral disputes in Nigeria. Particularly, section 285 of the CFRN outlines how election tribunals are created and what authority they have, granting them the sole ability to listen to and resolve cases that question the legitimacy of elections. The Electoral Act of 2022 offers additional details regarding the reasons for filing an election petition, covering matters like disqualification, corrupt actions, and failure to follow electoral regulations. Overall, these rules collaborate to guarantee that conflicts regarding elections are handled justly and openly, maintaining the trustworthiness of Nigeria's democratic system.

According to the Electoral Act, there are two categories of conflicts - those before the election and those after the election. Any issues connected to the disqualification, nomination, replacement, and support of candidates happen before the actual voting during an election and are classified as pre-election matters. These involve questions about whether candidates meet the qualifications for elections, their disqualification, changes in candidates, or who political parties are backing. In contrast, post-election conflicts, known as Election Petitions, deal with events that occur on the day of the election, such as counting votes and declaring results.

The reasons for filing election petitions in Nigeria are specified in section 134 of the Electoral Act 2022. There are three primary reasons for contesting disputes that arise after elections in Nigeria. The first reason is a lack of qualification. This reason is applied when disputing the legitimacy of a candidate's election who has been announced and confirmed by the Independent National Electoral Commission (INEC) ^[25]. To contest an election, a candidate must meet specific constitutional qualifications outlined in sections 65, 106, 131, or 177 of the CFRN, and are not in breach of sections 66, 107, 137, or 182. It is trite that when questioning a candidate's eligibility, it is essential to present concrete documentary evidence to support the claims than witness testimony or affidavits. This is because documents provide the best evidence of their contents, and oral evidence cannot contradict or alter the contents of a document unless fraud is alleged ^[26]. When a person is not eligible to run in an election, any votes that people voted for them are discarded, and the person who came in second or their rival might be announced as the winner. This is the scenario in the case of PDP v Degi-Eremienyo ^[27] otherwise called the Bayelsa Governorship case where the Supreme

Court of Nigeria nullified the election of David Lyon as the Governor of Bayelsa State due to the forged certificate of the Deputy Governor, Biobarakuma Degi-Eremienyo.

The second reason is stated in section 134(1) of the Electoral Act. An election can be disputed if it is found to be invalid because of dishonest actions or failure to follow the law. These situations arise when the rules for elections are not adhered to, which includes: voting without proper permission, lack of openness, improper handling of ballots, not reporting incidents properly, and various other rule-breaking actions. In a case where someone brings an election complaint and claims dishonest actions or illegal behavior against the other party, section 135(1) of the Electoral Act usually requires the person making the claim to prove beyond reasonable doubt ^[28]. When someone makes a claim that the Electoral Act was not followed, they encounter a challenging situation since the outcome announced by the INEC is assumed to be right. This means the person making the claim must provide evidence to show it is wrong. To win their case, they need to show that there was a failure to comply at each polling unit and ward, which is a tough job that demands careful documentation. Furthermore, the level of evidence needed is quite high, as it requires showing that it is more likely than not, rather than just providing very little proof ^[29].

When allegations of electoral malpractices and fraud are dismissed, the petition is essentially closed. On the other hand, if substantial non-compliance and corrupt practices are proven, the election results can be nullified ^[30]. To put it differently, if the person making the request cannot back up their claims, the request is thrown out, and the election results remain as they are. On the other hand, if the person making the request is able to clearly show that there were major violations of election laws and dishonest actions, the election could be canceled, and a new election might be arranged ^[31].

Given the previous context, it is evident that the evidence required for this second reason is so substantial that many people filing petitions choose to focus on other reasons. The Supreme Court of Nigeria has been subtly suggesting to those filing petitions to seek alternative reasons to challenge an election, but if the petitioner chooses to stick with non-compliance as a reason, it applies the principle of 'volenti non-fit injuria'. That was what the Supreme Court meant when it advised petitioners in the case of Ngige v INEC & Ors ^[32] that:

The burden of proving any allegation of non-compliance with the Electoral Act in the conduct of elections remains with the petitioner. So, it is left with a petitioner to decide whether he should file a petition seeking the nullification of the election on the ground of non-compliance with the Electoral Act, knowing the herculean task involved in adducing sufficient evidence to prove substantial non-compliance leading to the nullification of the election.

The final reason for challenging an election, for which the results have been announced by the INEC, is found in Section 138(1)(c) of the Electoral Act 2010, which was updated to section 134(1)(c) in the Electoral Act 2022. This section states that an election can be disputed on any of the following reasons, specifically...(c), 'that the respondent was not duly elected by majority of lawful votes cast at the election'. If someone claims that a candidate did not receive

the majority of valid votes, it means comparing and analysing the vote counts^[33]. This ground has to do with errors of collation, miscalculation or exclusion of lawful votes to the disadvantage of the petitioner or vice versa. To support these claims, it is necessary to accurately count the registered voters, the overall number of votes made, and the votes received by each candidate. To keep a complaint based on this reason, there should be clear statements about the presence of two different sets of results from the same election. It is important to understand that the election results published by the INEC are assumed to be correct, real, and valid according to Section 149 of the Evidence Act, 2022. Therefore, a person challenging the election results because the respondent didn't win the majority of valid votes has a significant responsibility to challenge this assumption.

Limitation of time for the Hearing and Determination of Election Disputes

This section examines the impact of time limitations on electoral litigation. The Electoral Act of 1982,^[34] pioneered the establishment of statutory timeframes for filing and resolving of election litigation in Nigeria^[35]. However, this legislative innovation was subsequently challenged in court, culminating in the landmark Supreme Court case of *Unongo v Aku*^[36] and *Kadiya v Lar*^[37], where sections 127 and 140(2) of the Act were declared unconstitutional. The apex court held that the above sections of the Act impermissibly curtailed citizens constitutional right to fair hearing and the National Assembly had overstepped its legislative authority. The court's statement highlights the difficulties and issues involved in managing the need to quickly settle election conflicts while also protecting rights, such as the right to a fair trial.

The courts started to be criticised for the lengthy legal battles over election disputes since people were kept in suspense for a long time about the outcome of their votes. For example, in *Ekiti*^[38], and *Anambra*^[39, 1] States, it took a long time, and in certain situations, it took anywhere from two to three years out of the four-year terms before the election petitions were resolved at last^[40]. It quickly became clear that it was time to look back at how long legal processes take. The reasons for changing the timing of judicial proceedings include wasting taxpayer money, delays in achieving justice, ineffective time organisation, bad management of cases, too many long and unnecessary breaks, repeated unneeded applications, pointless petitions or arguments, irrelevant early objections, dishonesty, and causing frustration for those involved in the legal process^[41].

In response to the above well-known issues with the general elections in Nigeria, in 2007, the Electoral Reform Committee, known as the Uwais Panel, was established to investigate the problems related to elections. One key suggestion from the committee was to set a time limit for addressing and resolving election petitions. This suggestion was later added to the CFRN through section 29 of the First Alteration Act in 2010, and it can now be found in sections 285(5), (6), and (7) of the CFRN. Specifically, section 285(5) of the Constitution states that an election petition must be submitted within 21 days following the announcement of election results. Also, subsection 285(6) highlights that the tribunal needs to issue its judgment within 180 days from when the petition was filed. Section

285(7) of the CFRN emphasises that any appeal related to election petitions must be finished within 60 days after the tribunal's judgment or the Court of Appeal's decision as the case may be. There are similar rules about deadlines for pre-election cases found in sections 285(11), (12), and (14) of the CFRN. However, some important factors overlooked by lawmakers include the difficulties in getting Certified True Copies (CTC) of court judgments, the necessity for extensions in certain cases, the timeline for submitting a notice of appeal, and the preparation of appeal records. In addition, to enhance the speed at which election-related cases are handled, heads of courts have continued to issue practice directions regarding electoral issues. These practice directions allow election tribunals to reduce the constitutional timelines for electoral litigation, which may help to expedite the process.

Regrettably, the courts are interpreting section 285(5), (6) and (7) of the CFRN in a literal manner, seemingly disregarding earlier Supreme Court precedents established in cases, such as *Unongo v Aku*,^[42] *Abbot v Sullivan*,^[43] and *AG Abia State v AG Fed*^[44] among others. This literal approach has been applied in more recent cases, including *Ebiuwou Koku v APGA*,^[45] *Ben Ololo v APC*,^[46] *PDP v CPC*,^[47] *Abubakar v Nasamu*,^[48] *Amadi v INEC*,^[49] *PDP v Okorochoa*,^[50] *Ugba v Suswan*,^[51] *Udenwa v Uzodinma*,^[52] *ANPP v Goni*,^[53] *ACN v INEC*.^[54]

Establishing a deadline for resolving electoral disputes is not inherently problematic. Nevertheless, issues arise when minor details outweigh the importance of fair hearing within this legal timeline. In the authors' opinion, this is precisely what has happened in the cases mentioned earlier, which were decided following the changes made to section 285 of the CFRN. These cases show a trend of prioritising quick resolutions and technicalities over achieving genuine justice. It is unfortunate that aggrieved petitioners continue to face injustices due to the rigid application of the 180-day rule, as seen in the 2023 Court of Appeal case of *Chukwurah v APC*,^[55] where same principles were applied. The rigid application of section 285(5) and (6) continue to result in outcomes that may seem absurd to the general public, highlighting the need for further clarification or reform through the philosophy of judicial activism. The mischief sought to be cured by section 285(5), (6) and (7) of the CFRN continues to occasion clear injustice in the adjudication of election disputes.

Also, it is the position of the authors' that stringent time limitation can limit access to justice, particularly for marginalised groups or those with limited resources. Brief timelines can compromise the quality of evidence gathering and case preparation. Rushed proceedings can lead to incorrect judgments or denial of justice.

Conclusion and Recommendations

The article is of the stance that while there is need to speed-up electoral cases, justice should not be sacrificed for speed. This is so because the various provisions of the laws cited in this article have provided for the need to speed-up electoral cases without taking into consideration the need to balance same with maintaining a high standard of Justice. A judiciary that is overly interventionist, risks undermining democratic stability, while excessive judicial restraint may render the courts ineffective in addressing pressing societal injustices in election cases due to time limitation. Therefore,

a judicious and principled approach to judicial activism is imperative, ensuring that while courts continue to act as guardians of justice, their decisions remain firmly rooted in constitutional principles, democratic accountability, and institutional integrity.

Section 185 of the CFRN should be amended to accommodate exigencies and allow for flexibility in timelines under defined circumstances. The section should be amended to provide for exceptional circumstances on the 180 days limitation period of electoral litigation in Nigeria.

Judicial activism should be legislated to give the court the free will to exceed electoral time limit when such limit would hinder the overall interest of justice. It is feasible to use judicial activism to address serious issues, particularly to guarantee fairness in elections during legal disputes. Therefore, there should be provisions and methods for applying judicial activism, even by tribunals handling election petitions.

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