

Note:

1. This work contains the most basic drafts. Once you have mastered the form and content, you can adapt other drafts to it.
2. KINDLY DISREGARD ERRORS IN NOMENCLATURE.
3. Abbreviations are used in this work to enable you create a mental remembrance because in the exams an apt memory and sound understanding would be vital tools. You know (FOR EXAMPLE) that HCL means High Court Lagos, etc.

KINDLY MOVE TO THE NEXT PAGE.

ViteSolutions

1. Specimen Statement of Claim in the Magistrate Court.

IN THE MAGISTRATES' COURT OF LAGOS STATE

IN THE LAGOS MAGISTERIAL DISTRICT.

HOLDEN AT LAGOS.

CLAIM NO

BETWEEN

AJAYI TANKO.....CLAIMANT

AND

ABIOLA MOHAMMED.....DEFENDANT

STATEMENT OF CLAIM

The claimant claims the sum of 1,300,000 (One Million Three Hundred Thousand Naira only) being damages for injury caused to the defendant.

PARTICULARS OF CLAIM.

1. The claimant has suffered damages from the defendant **on** the 24th day of September, 2010 **at** the Jolly Bar, Onike Street, Lagos where the defendant struck the claimant on the head occasioning bodily harm and resulting in a bruise on the claimant's head.

PARTICULARS OF LOSS

A. Medical Treatment	N 300, 000
B. Loss of Earning	N 500, 000
C. General damages	N 500, 000

The claimant claims the sum of N1,300,000 (one million three hundred Naira) against the defendant being special and general damages.

Dated in Lagos this.... Day of 2017.

Henry Agabu Esq.

Claimant's Solicitor.

34, Bucknor Avenue Ikoyi, Lagos.

CLAIMANT'S ADDRESS:

15, Kikelomo Road, Obalende Lagos.

FOR SERVICE ON THE DEFENDANT:

No. 22 Broad Street Lagos (0902 223 1231

IN THE MAGISTRATES' COURT OF LAGOS STATE
IN THE LAGOS MAGISTERIAL DISTRICT.
HOLDEN AT LAGOS.

CLAIM NO

BETWEEN

AJAYI TANKO.....CLAIMANT

AND

ABIOLA MOHAMMED.....DEFENDANT

TO THE DEFENDANT:

THE CLAIMANT CLAIMS from the defendant as follows;

1. General Damages N 400,000
2. Court fee..... N 20,000
3. Costs of this Action..... N 120,000

Total: N 540,000 Five Hundred and Forty Naira Only.

YOU ARE HEREBY SUMMONED to appear at
Magistrates Court in on Day of 20...
at O'clock in the Noon when the claim will be heard.

Dated this ... day of 20....

Registrar Note:

Henry Agabu

Claimant's Solicitor.

34, Bucknor Avenue Ikoyi, Lagos.

CLAIMANT'S ADDRESS:

15, Kikelomo Road, Obalende Lagos.

FOR SERVICE ON THE DEFENDANT:

No. 22 Broad Street Lagos (0902 223 1231

3.1 FIRST HAVE YOUR APPLICATION LETTER TO THE
MAGISTRATE THUS:

CHUKWUDI EZE AND ASSOCIATES.

LEGAL PRACTITIONERS AND SOLICITORS

NO. 43 AWOLowo WAY, FALOMO LAGOS.

Chukwudieze@gmail.com 090335886554

Our Ref: _____

Your Ref: _____

The Registrar,
Magistrate Court of Lagos State,
Ikeja Magisterial District,
Ikeja, Lagos.

Dear sir,

APPLICATION FOR SUMMARY SUMMONS

We wish to apply that a summary summons be issued against the defendant as per the attached claim and particulars of claim. We undertake to pay the necessary fees.

We thank you for your usual co-operation.

Yours faithfully,

Chukwudi Eze Esq.
For Chukwudi Eze and Co LP.

Enclosed:

- 1) Claim dated 5th September, 2017
- 2) Particulars of claim dated 5th September, 2017.

IN THE MAGISTRATES' COURT OF LAGOS STATE
IN THE IKEJA MAGISTERIAL DISTRICT.
HOLDEN AT IKEJA.

CLAIM NO

BETWEEN

AJAYI TANKO.....CLAIMANT

AND

ABIOLA MOHAMMED.....DEFENDANT

TO THE DEFENDANT.

The claimant claims N 200,000 (two hundred thousand Naira) being the sum being owned to him.

Court Fees.....

Other Disbursements.....

Costs.....

Total.....

Judgment may be obtained against you and enforced unless within 10 days of service inclusive of the day of service on you; pay the claimed amount into the court or send your admission, defence or counterclaim.

Dated the..... day of 2017

REGISTRAR INSTRUCTIONS:

Henry Agabu

Claimant's Solicitor.

34, Bucknor Avenue Ikoyi, Lagos.

CLAIMANT'S ADDRESS:

15, Kikelomo Road, Obalende Lagos.

FOR SERVICE ON THE DEFENDANT:

No. 22 Broad Street Lagos (0902 223 1231)

IN THE HIGH COURT OF LAGOS STATE.

IN THE IKEJA JUDICIAL DIVISION.

HOLDEN AT IKEJA.

SUIT NO.....

BETWEEN¹

OMEGA BANK PLC } CLAIMANT.

AND

COMPUTRONICS NIGERIA LTD DEFENDANT.

TO:

COMPUTRONICS NIGERIA LTD of No. 42 Isokoro Road Lagos in the Ikeja Judicial Division.

YOU ARE HEREBY COMMANDED that within forty-two (42) days² after the service of this writ upon you, you cause an appearance to be entered for you in an action at the suit of COMPUTRONICS NIGERIA LTD and take notice that in default of your doing so, the Claimant may proceed therein, and judgment may be given in your absence.

DATED this 25th day of July 2017.

REGISTRAR.

N.B. This writ is to be served within six calendar months from the date thereof, or if renewed, within three calendar months from the date of the last renewal including the day of such date, and not afterwards.

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

Endorsement to be made on the Writ before issue thereof

¹ If administration, writ should be headed "in the matter of the estate of Deceased". For probate; "In the Estate of A.... Deceased". For trust; "In the matter of Quist Trust". If in representative capacity the writ should state in what capacity. For company in liquidation; "xyz Claimant, who are a company in liquidation. The Liquidator (name) of (address). For foreign company; "xyz" claimants, who are a foreign corporation within the meaning of the CAMA. The registered name and address of the person to be served are (put here).

² If Abuja, it would be within 8 days.

The Claimant's claim is for recovery of the sum of 25,000,000 (twenty five million Naira) with an interest rate of 21 percent per annum.

This writ was served by me at On the defendant personally on the day of 2017.

Endorsed the..... day of 2017

(Signed).

FOR SERVICE ON;

1. The 1st Defendant:

No 16. Abugu Road (Phone No. + 234-01457654)

Lagos.

2. The 2nd Defendant:

No. 14 Zebra Crescent (Phone No. 0905567443)

Lagos.

3. The 3rd Defendant:

No. 14 Zebra Crescent, GRA (Phone No. 07033553741)

Vitesolutions

WRIT FOR SERVICE OUT OF THE JURISDICTION.

TO: A of

YOU ARE HEREBY COMMANDED THAT WITHIN days after service of this writ on you (Inclusive of the date of service), you do cause an appearance to be entered for you in the Ikeja Judicial Division of the High Court of Lagos in an action at the suit of B; and take notice that in default of your so doing the Claimant may proceed herein, and judgment may be given in your absence.

Dated the day of 2017. By order of the Court.

NB:

Vitesolutions

IN THE HIGH COURT OF LAGOS STATE
IN THE LAGOS JUDICIAL DIVISION
HOLDEN AT LAGOS

SUIT NO:.....

BETWEEN

ADETAYO OBALENDE..... CLAIMANT

AND

ABASS IKKENNA.

LET ABASS IKENNA of No. 42 Ibinabo Drive Mission Street Lagos in the Lagos Judicial Division Within forty-two days after the service of this summons on him inclusive of the day of such service, cause an appearance to be entered for him to this summons which is issued upon the application of ADETAYO OBALENDE of No. 23 Sarko Street Lagos. Who claims to be (nature of claim) FOR THE DETERMINATION of the following questions:

= (.....)

DATED the

This summons was taken out by of..... agents for
OfLP for the applicant.

6. SPECIMEN EX PARTE SUMMONS

IN THE HIGH COURT OF LAGOS STATE.

IN THE IKEJA JUDICIAL DIVISION.

HOLDEN AT IKEJA.

SUIT NO.....

BETWEEN

OMEGA BANK PLC

}

CLAIMANT.

AND

COMPUTRONICS NIGERIA LTD

DEFENDANT.

LET ALL PARTIES CONCERNED ATTEND before the High Court of Lagos at the Lagos Judicial Division on the hearing of an application on the part of the above named company....

This summons was taken out by of..... agents for
OfLP for the applicant.

SIGNED: _____

7. Specimen Statement of Claim.

IN THE HIGH COURT OF LAGOS STATE.

IN THE IKEJA JUDICIAL DIVISION.

HOLDEN AT IKEJA.

BETWEEN

OMEGA BANK PLC } CLAIMANT.

AND

COMPUTRONICS NIGERIA LTD } FIRST DEFENDANT.

DR JOHNSON OBED } SECOND DEFENDANT.

MRS FATIMA OBED } THIRD DEFENDANT

TO:

COMPUTRONICS NIGERIA LTD of No. 42 Isokoro Road LAGOS in the
IKEJA Judicial Division.

Mr Johnson Obed of No. 14 Zebra Crescent, LAGOS in the IKEJA Judicial
Division.

Mrs Fatima Obed of No. 15 Zebra Crescent, LAGOS in the IKEJA Judicial
Division.

YOU ARE HEREBY COMMANDED that within forty-two (42) days after
the service of this writ upon you, you cause an appearance to be entered for
you in an action at the suit of COMPUTRONICS NIGERIA LTD and take
notice that in default of your doing so, the Claimant may proceed therein, and
judgment may be given in your absence.

DATED this 25th day of July 2017.

REGISTRAR.

N.B. This writ is to be served within six calendar months from the date
thereof, or if renewed, within three calendar months from the date of the last
renewal including the day of such date, and not afterwards.

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

Endorsement to be made on the Writ before issue thereof

The Claimant's claim is for recovery of the sum of 25,000,000 (twenty five million Naira) with an interest rate of 21 percent per annum.

This writ was issued by Amadi Michael Esq of BATOPE LP (Claimant's Counsel) whose address for service is No. 23. Aburime Road LAGOS.

Endorsement to be made on copy of writ forthwith after service.

This writ was served by me at On the defendant personally on the day of 2017.

Endorsed the..... day of 2017

(Signed).

FOR SERVICE ON;

1. The 1st Defendant:

No 16. Abugu Road (Phone No. + 234-01457654)

LAGOS.

2. The 2nd Defendant:

No. 14 Zebra Crescent (Phone No. 0905567443)

LAGOS.

3. The 3rd Defendant:

No. 14 Zebra Crescent, GRA (Phone No. 07033553741)

9. Specimen Statement of Claim

IN THE HIGH COURT OF LAGOS STATE

IN THE IKEJA JUDICIAL DIVISION

HOLDEN AT IKEJA

SUIT NO:

BETWEEN

OMEGA BANK PLC } CLAIMANT

AND

COMPUTRONICS NIGERIA LTD }

DR JOHNSON OBED } DEFENDANTS

MRS FATIMA OBED }

STATEMENT OF CLAIM

1. The Claimant is a Financial Institution and a Public Limited Liability Company incorporated under the Companies and Allied Matters Act with its registered address at No. 5 Isokoro Road LAGOS within the jurisdiction of this Honourable Court.

2. The 1st Defendant is a trading company and a Private Limited Liability Company Incorporated under the Companies and Allied Matters Act with its Registered Address at No 16. Abugu Road, LAGOS within the jurisdiction of this Honourable Court.

3. The 2nd Defendant is the Managing Director of the 1st Defendant Company who personally guaranteed the loan and resides at No. 14 Zebra Crescent, LAGOS within the jurisdiction of this Honourable Court.

4. The 3rd Defendant is the Wife of the Second Defendant who charged her personal property (A five bedroom duplex at No. 15 Zebra Crescent, GRA, LAGOS with certificate number EN/ZEB/14/2001) as security for the loan.

5. On the 1st of May 2015, the 1st Defendant made an application for a loan to the Claimant.

6. After series of meetings between all the parties concerned, a deed of legal mortgage was duly executed between the parties on the 27th of June 2015.

7. In pursuance of the mortgage agreement, the parties agreed *inter alia*:

A. The tenure of the loan is for 18 months.

B. The applicable interest rate at the time of contracting is 21 percent per annum, subject to the Central Bank of Nigeria Monetary Policy Guidelines.

C. The legal due date for the repayment of the loan was agreed to be the 31st of December, 2016.

8. On the 1st of July 2015, the Claimant advanced the loan facility of ₦25,000,000 (Twenty-Five Million Naira) to the 1st Defendant.

9. The 1st Defendant defaulted in paying the principal sum and interest as agreed.

10. The Claimant thereafter served several demand letters on the 1st Defendant dated 31st January 2017, 28th February 2017, 31st March 2017, 30th April, 2017 and 31st May 2017. We seek to rely on the said letters.

11. The 1st Defendant neglected to respond to the letters served on them and thereafter a final demand notice was served on the 30th June 2017. The said letter is herein pleaded.

12. **WHEREFORE** the Claimant claims from the defendants jointly and severally as follows:

a. The sum of ₦25,000,000 (Twenty-Five Million Naira only) being the principal sum.

b. Interest on the said sum of ₦25,000,000 (Twenty-Five Million Naira only) at the rate of 21% per annum from 1st July, 2015 to 31st December 2016 and at the rate of 26% per annum as stipulated in the Central bank Monetary Policy Amended Guidelines 2017 from the 1st of January 2017 until judgment is given.

c. Interest at the rate of 10% per annum until final liquidation of the judgment debt.

d. The sum of ₦5,000,000 (Five million naira only) being general damages.

e. The costs of this action.

DATED this, 25th Day of July, 2017.

Amadi Michael Esq.

BATOPE LP

(Claimant's Counsel)

No. 23. Aburime Road

LAGOS.

FOR SERVICE ON;

1. The 1st Defendant:

No 16. Abugu Road (Phone No. + 234-01457654)

LAGOS.

2. The 2nd Defendant:

No. 14 Zebra Crescent (Phone No. 0905567443)

LAGOS.

3. The 3rd Defendant:

No. 14 Zebra Crescent, GRA (Phone No. 07033553741).

ViteSolutions

10. SPECIMEN STATEMENT OF DEFENCE.

IN THE HIGH COURT OF LAGOS STATE.

IN THE LAGOS JUDICIAL DIVISION

HOLDEN AT LAGOS

SUIT NO: LD/1232/17

BETWEEN:

ADEBAYO PAUL

CLAIMANT.

AND

HENRIETTA TAOFEK

DEFENDANT.

STATEMENT OF DEFENCE.

1. Save and except as are herein expressly and specifically admitted, the defendant denies each and every allegation contained in the claimant's Statement of Claim as if such allegations were herein set out and traversed in seriatim.

2. The Defendant never wrote or printed any of the words set out in Paragraph 6 of the SOC.

3, 4, 5,

6. The defendant will contend at the trial of this action that the defendant is not competent to bring this action.

7. **WHEREOF**, the defendant say that the claimant is not entitled to claim as per his Writ of Summnos and that this claim be dismissed with substantial costs.

DATED this 2017.

Solicitor's address.

FOR SERVICE ON.

Claimant's Address.

11. APPEALS.

11A.

IN THE COURT OF APPEAL OF NIGERIA

IN THE LAGOS JUDICIAL DIVISION

HOLDEN AT LAGOS

SUIT NO: HC/LD/13/17

APPEAL NO: CA/LD/2/17

BETWEEN

TEKNO MILES..... DEFENDANT/APPELLANT

AND

REEKADO BANKS..... CLAIMANT/RESPONDENT

NOTICE OF MOTION FOR LEAVE TO APPEAL.

1. TAKE NOTICE that the Court of Appeal will be moved on At In the forenoon or so soon thereafter as Counsel can be heard on the hearing of an application for leave to appeal against the decision of the Court on the day2017.

2. AND further take notice that the grounds of this application are;

a.

3. AND further take notice that the following documents are exhibited in this application;

a. The

DATED this day of2017

Applicant/his LP.

To:

THE REGISTRAR

COURT OF APPEAL

IN THE COURT OF APPEAL OF NIGERIA
IN THE LAGOS JUDICIAL DIVISION
HOLDEN AT LAGOS

SUIT NO: HC/LD/13/17

APPEAL NO:

BETWEEN

TEKNO MILES..... DEFENDANT/APPELLANT

AND

REEKADO BANKS..... CLAIMANT/RESPONDENT

NOTICE OF APPEAL

1. TAKE NOTICE that the Claimant/defendant being dissatisfied with the decisions of the High Court of Lagos State contained in the judgment/order of..... dated the 2017 doth hereby appeal to the CoA upon the grounds set out in paragraph 3 and will at the hearing of the appeal seek the relief set out in paragraph 4.

2. PART OF DECISION OF LOWER COURT COMPLAINED OF: The whole decision.

3. GROUNDS OF APPEAL.

a. The trial judge erred in law when he held that a Claimant cannot be forced to go after parties he does not wish to sue.

4. PARTICULARS OF ERROR:

a. The principle that a Claimant cannot be forced to go after parties he does not wish to sue does not apply where a third party alleging that he has interest in the suit applies to be joined. In such an instance, it is at the discretion of the court rather than the party.

b. The trial judge

c.

4. RELIEF SOUGHT FROM THE COURT OF APPEAL.

The appellant hereby seeks the following reliefs:

a.

b.

5. PERSONS DIRECTLY AFFECTED BY THE APPEAL.

a. Tanko Suleiman of No. 45 Aburime Street Lagos.

b.

DATED this 2017.

Counsel's details and signature here.

For Service on the respondent:

Respondent's address.

Note that other drafts like respondent's notice, etc are similar to the above.
What usually matters is the details of the court judgement.

Vitesolutions

12. SPECIMEN NOTICE BY RESPONDENT OF INTENTION TO
CONTEND THAT THE DECISION OF THE COURT BELOW BE
VARIED.

IN THE COURT OF APPEAL OF NIGERIA

IN THE LAGOS JUDICIAL DIVISION

HOLDEN AT LAGOS

SUIT NO: HC/LD/13/17

APPEAL NO:

BETWEEN

TEKNO MILES..... DEFENDANT/APPELLANT

AND

REEKADO BANKS..... CLAIMANT/RESPONDENT

NOTICE BY RESPONDENT OF INTENTION TO CONTEND THAT
THE DECISION OF THE COURT BELOW BE VARIED.

TAKE NOTICE that upon hearing the above appeal the respondent herein
intends to contend that the decision of the court below dated the2017
shall be varied as follows;

- 1.
- 2.
- 3.

DATED this day2017

Respondent/LP

ON NOTICE TO THE DEFENDANTS:

13. RECOVERY OF POSSESSION OF PREMISES.

13A. LETTER OF AUTHORITY FROM LANDLORD TO SOLICITOR

Chief Emaka Chukwu.
No. 25 Ojukwu Layout Unilag.
Yaba, Lagos.
16th August, 2017.

Chukwudi Eze.
No. 16 Falomo Way Ikoyi.
Ikoyi, Lagos.
Dear Sir,

**AUTHORITY TO ISSUE NOTICE TO QUIT AND OTHER RELEVANT
NOTICES TO MY TENANTS IN IGBEYAWO LODGE, SURULERE**

I, Chief Emaka Chukwu of 11, Ikeja Street, Ikeja, hereby appoint you Mr. Chukwudi Eze, a legal practitioner, to act on my behalf with respect to the issuance of notices to the tenants in occupation of my property at number 7, Surulere, Lagos, known as Abatua Lodge

I authorize you to do any lawful act which may be necessary for the recovery of the premises.

Thank you

Yours faithfully

(signature)

Chief Emaka Chukwu

FORM C

(FIRM LETTER HEAD)

To: A (Full Address)

31st August, 2017.

DEAR Sir,

NOTICE TO QUIT.

I Abiola Akin Esq. write to you as legal practitioner of your landlord and on his behalf, give you notice to quit and deliver up possession of the apartment with appurtenances situate at..... in the town of which you hold of him as tenant on the day of

DATED THIS 2017.

SIGNED.(name and address of LP)

Vitesolutions

CIVIL DRAFTS BY VITESOLUTIONS downloaded from www.iso-chukwu.com
FORM E Specimen NOTICE TO TENANT OF OWNERS INTENTION
TO APPLY TO RECOVER POSSESSION.

(LETTER HEAD)

TO: (ADDRESS OF OCCUPIER)

I Abiola Akin write to you as legal practitioner of the owner and do hereby give you notice, that unless peaceable possession for the premises situate at..... Which were held by you under a tenancy from year to year (or monthly or quarterly, etc) which was determined/expired on..... by notice to quit from the said which premises are now held over and detained. Be given to the owner..... On or before the expiration of seven clear days from the service of this notice on you.

I..... shall on..... theday of 2017 at O'clock of the same day, at Apply to court to issue a warrant directing an appropriate person to enter and eject any person there from.

DATED THIS 2017.

SIGNED.

Vitesolutions

IN THE HCL

ILJD

HAL

SUIT NO.....

PETITION NO:.....

BETWEEN

.....PETITIONER

AND

.....RESPONDENT.

1. PETITION FOR DISSOLUTION OF MARRIAGE- the above named high court.

The petitioner..... whose address is at..... And whose occupation is banker with UBA Marina Branch petitions the court for a decree of dissolution of the marriage against the respondent Akinola Bendel whose address is at and whose occupation is Of Stanbic IBTC, Lekki Lagos on the ground that the marriage has irretrievably broken down for:

- a. Cruelty
- b. Adultery which the petitioner finds intolerable.

2. MARRIAGE:

- a. Lawfully married at on
- b.. The Surname of the petitioner before the marriage was.....

3. BIRTH OF PETITIONER AND RESPONDENT.

- a. The petitioner was born in In..... and the respondent was born in in

4. DOMICILE OF THE PARTIES:

- a. The petitioner is within the meaning of this act domiciled in Nigeria living at and has remained within the jurisdiction of.....

5. COHABITATION

- a. immediately after the marriage we lived together at.....

Cohabitation ceased on the

- b. The children of the marriage are:

6. CONDONATION, CONNIVANCE AND COLLUSION.

a. the petitioner has not condoned or connived or colluded with the respondent.

7. PROPOSED ARRANGEMENTS FOR CHILDREN

8. EDUCATION; MAINTENANCE, CUSTODY, MORAL OBLIGATION TOWARDS THE CHILDREN.

9. PREVIOUS PROCEEDINGS

a. Since the marriage there has not been any proceeding in the court between the petitioner and respondent.

10. GROUND FOR PETITION

a. On the basis that the marriage has broken down irretrievably.

b. the facts relied upon by the petitioner as constituting the grounds are:

- On..... at.... the respondent.....

- On..... At..... the respondent.....

11. ORDERS SOUGHT: The petitioner seeks the following orders

a. A decree of dissolution of the marriage on the ground that By reason of....

b. Custody of the

c. Respondent be ordered to pay maintenance of...

d. Access to

The petition was settled by C, LP for the petitioner.

Filed on the 2017 by C on behalf of the petitioner whose address for service is at;

PETITIONER(s) Counsel.

Petitioner's Counsel's Address.

For Service on the Respondent:

Specimen Verifying Affidavit. Must accompany the election petition.

VERIFYING AFFIDAVIT.

ITHCL

ITLJD

HAL

SUIT NO.

BETWEEN

AND

VERIFYING AFFIDAVIT.

I, MRS, Nigeria citizen, female, Christian, Banker residing at..... make oath and state as follows.

1. That I am the petitioner in the suit.
2. That I verify the facts stated in my petition by virtue of my personal knowledge of same.
3. That the statements set forth in Para I to ... of my petition are true and correct to the best of my knowledge, information and belief.

Deponent

Sworn at the Lagos State High Court Registry, thisday of 17.

BEFORE ME

COMMISSIONER FOR OATHS

NOTICE OF PETITION. (IMPORTANT AND SHOULD FOLLOW ORIGINATING PROCESSES).

TO: Akinola Bendel, 127 Martins Street, Lagos.

TAKE NOTICE that a petition has been presented to the above-named court by Mrs Olajumoke Bendel of..... instituting proceedings for a decree of dissolution and also seeking orders with respect to the children of the marriage.

.....Plus 2 other pages I doubt are relevant.

Just put the closure here

IN THE HIGH COURT OF LAGOS STATE
IN THE LAGOS JUDICIAL DIVISION
HOLDEN AT LAGOS

SUIT NO.....

BETWEEN

AMINU DEEN..... CLAIMANT/RESPONDENT

AND

BALA BUBA DEFENDANT/APPLICANT

NOTICE OF PRELIMINARY OBJECTION BROUGHT PURSUANT TO
SECTION 12(2) OF THE NIGERIAN NATIONAL CORPORATION ACT
CAP N22 LFN 2004 AND THE INHERENT JURISDICTION OF THIS
HONOURABLE COURT.

TAKE NOTICE that the Defendant/Applicant shall at the hearing of the
claimant's suit contend by way of preliminary objection that this
honourable court lacks jurisdiction to hear and determine this suit and shall
pray that the same be dismissed *in limine*.

TAKE FURTHER NOTICE that the grounds upon which the applicant is
brought is as follows:

1. Condition precedent in respect of pre-action notice has not been met.
2. This Honourable Court Lacks Jurisdiction to hear the suit.

DATED this Day of..... 2014.

Atake Bako Esq.

Applicant's Counsel

Gooltz and Co

No. 34 Umukoro Drive, Mile 13 Lagos.

FOR SERVICE ON THE DEFENDANT

Yakubu Goron

C/O his Counsel

Atanda Musa Esq.

Yinnks and Co LP.

MOVING A MOTION IN COURT:

My Lord, before your lordship is a motion on notice (or motion ex parte) dated the 2017, filed on..... brought pursuant to

My Lord, the motion prays for the following orders.....

My lord, this motion is supported by a 13 paragraph affidavit, we rely on all paragraphs of the affidavit.... (if written addresses were filed, you can say, my lord, we have already filed a written address with our application, we adopt same as our oral argument.

My lord, the applicant has satisfied the conditions required.

We urge your lordship to grant this application.

We are most grateful for your Lordship's kind patience.

Counsel on the other part may respond; My lord, we oppose to this application. In doing so, we have filed a counter affidavit of 12 paragraphs deposed to by..... we have also filed a written address along with the counter affidavit. We adopt same.....

Kindly Note Election Petition Draft.