

20th November, 2023

The Honourable Justice Monica Dengbem-Mensem,
The President of the Court of Appeal,
Court of Appeal of Nigeria,
Three Arms Zone,
Shehu Shagari Way,
Central Business District.
FCT-Abuja.

My Lord,

**REQUEST FOR CLARIFICATION IN THE DECISION OF THE COURT
OF APPEAL IN APPEAL NO. CA/K/EP/HR/KD/35/2023 BETWEEN HON.
ZAYYAD IBRAHIM & 1 OR. V. INEC & 2 ORS. DELIVERED ON THE
2ND NOVEMBER, 2023 BY MOORE A. A. ADUMEIN, IBRAHIM W.
JAURO, SAMUEL ADEMOLA BOLA; JJCA**

I am the 2nd Respondent in the above stated appeal and I contested election for membership of the House of Representatives of the National Assembly Federal Republic of Nigeria under the platform of the Peoples Democratic Party on the 25th February, 2023 under an election organized by INEC and I was declared the winner and was returned elected and subsequently sworn in.

I write to request for a clarification of the orders of this honourable court in the judgment of the Court delivered on the 2nd Novemeber, 2023; as the orders cannot be enforced thus this letter.

After the judgment, which was very surprising to me, I made efforts to obtain a certified true copy of the said judgment but it was only on the 13th November, 2023 that I received a copy.

I have read the judgment of the Court and I wish to state that the orders are unenforceable for the following reasons:

- i. The certified true copy of the judgment contains 4 polling units as where re-run are to be conducted by the Independent National Electoral Commission as follows:

- a. Lawanati Kofar Jauro -Code 006,
 - b. Yelo Lima - Code 005
 - c. Abba Kalu - Code 012 and
 - d. Shilo Abone - Code 015
- ii. These polling units are not in Igabi Local Government of Kaduna State and do not form part of the polling units or wards that I contested the 25th February, 2023 elections under.
 - iii. The Appeal by the Appellant also does not include these places as polling units he is challenging.

This has occasioned serious injustice to me and it is to be regretted that I do not have a further right of appeal. Furthermore, I state unequivocally that if the Justices' of the court of appeal had dispassionately and painstakingly looked at their records the judgment would have been without this quagmire.

I also know that these Honourable Court will not want to leave my constituents unrepresented thus we need a clarification in order to forestall mischief by unscrupulous agents; as my seat has been declared vacant by the judgment.

I hereby attach the underlisted documents for your perusal to aid in the consideration of my plea viz;

- a. Judgment of the Court of Appeal.

I hope and pray that my plea will be given due consideration.

Yours faithfully,

JALLO HUSSAINI MOHAMMED

cc: INEC.

20th November, 2023

The Honourable Chairman,
Independent National Electoral Commission,
Plot 436 Zambezi Crescent,
Maitama 904101,
Abuja, FCT.

Dear Sir,

**REQUEST FOR CLARIFICATION IN THE DECISION OF THE COURT
OF APPEAL IN APPEAL NO. CA/K/EP/HR/KD/35/2023 BETWEEN HON.
ZAYYAD IBRAHIM & 1 OR. V. INEC & 2 ORS. DELIVERED ON THE
2ND NOVEMBER, 2023 BY MOORE A. A. ADUMEIN, IBRAHIM W.
JAURO, SAMUEL ADEMOLA BOLA; JJCA**

I am the 2nd Respondent in the above stated appeal and I contested election for membership of the House of Representatives of the National Assembly Federal Republic of Nigeria under the platform of the Peoples Democratic Party on the 25th February, 2023 under an election organized by INEC and I was declared the winner and was returned elected and subsequently sworn in.

My opponent of the All Progressive Congress after losing at the Tribunal filed an appeal at the Court of Appeal and re-run was declared. I hereby write to bring to your notice that I have read the judgment of the Court of Appeal on the 2nd November, 2023. I have observed that the orders cannot be enforced:

- i. The certified true copy of the judgment contains 4 polling units as where re-run are to be conducted by the Independent National Electoral Commission as follows:
 - a. Lawanati Kofar Jauro -Code 006,
 - b. Yelo Lima - Code 005
 - c. Abba Kalu - Code 012 and
 - d. Shilo Abone - Code 015

- ii. These polling units are not in Igabi Local Government of Kaduna State and do not form part of the polling units or wards that I contested the 25th February, 2023 elections under.
- iii. The Appeal by the Appellant also does not include these places as polling units he is challenging.

I hereby attach the underlisted documents for your perusal to aid in the consideration viz;

- a. A copy of my letter to the president of the Court of Appeal.

I hope and pray that my plea will be given due consideration.

Yours faithfully,

JALLO HUSSAINI MOHAMMED