

19th/9/2023

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SECRETARY
PRESIDENTIAL ELECTION PETITION
COURT 2023

IN THE SUPREME COURT OF NIGERIA

HOLDEN AT ABUJA

SC/ /2023

PETITION NO: CA/PEPC/04/2023

BETWEEN: J.J EKPEROBE Esq

ALLIED PEOPLES' MOVEMENT (APM)..... APPELLANT

AND

- 1. INDEPENDENT NATIONAL ELECTORAL COMMISSION (INEC)
- 2. ALL PROGRESSIVES CONGRESS(APC)
- 3. BOLA AHMED TINUBU
- 4. SENATOR KASHIM SHETTIMA
- 5. KABIR MASARI

RESPONDENTS

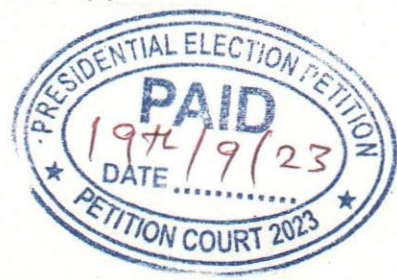
NOTICE OF APPEAL

TAKE NOTICE that the Appellant, being dissatisfied with the judgment of the Court of Appeal sitting as the "Presidential Election Petition Court" in Abuja (Coram: **Haruna Simon Tsammani, Stephen Jonah Adah, Misitura Omodere Bolaji-Yusuff, Boloukuromo Moses Ugo, and Abba Bello Mohammed, JJCA**) delivered on 6th September, 2023 in **Petition No. CA/PEPC/04/2023** do hereby appeal to the Supreme Court of Nigeria on the grounds set out in **Paragraph 3**, and will at the hearing of the Appeal seek the reliefs contained in **Paragraph 4**.

TAKE FURTHER Notice that the names and addresses of persons directly affected by the Appeal are those set out in Paragraph 5.

2. PART OF THE DECISION COMPLAINED OF:

The whole decision(s) made against the Appellant.



3. **GROUNDS OF APPEAL**

GROUND ONE

Error in Law

The learned Justices of the court below erred in law, when they granted the respective Motions filed by the 1st, 3rd and 4th Respondents (on 7/5/2023 and 12/5/2023 respectively) on the basis of which they struck out Appellant's Petition, and thereby occasioned a miscarriage of justice against the Appellant (as they held in Pages 378-379 of the Judgment):

"I note that the Petitioner/Respondent sought to tie his complaint of non-qualification to section 142 (1) of the 1999 Constitution (sic). That provision stipulates as follows:

"142(1) In any election to which the foregoing provisions of this part of this chapter relate, a candidate for an election to the office of President shall not be deemed to be validly nominated unless he nominates another candidate as his associate from the same political party for his running for the office of President, who is to occupy the office of Vice-President and that candidate shall be deemed to have been duly elected to the office of Vice-President if the candidate for election to the office of President who nominated him as such associate is duly elected as President in accordance with the provisions aforesaid."

I am of the view that the above cited provision of the Constitution does not create additional qualifications or disqualifications for a candidate contesting for the office of President of Nigeria. Furthermore, Section 142 of the 1999 Constitution read along with Section 141 create the offices of President and Vice-President. Section 142(1) is a specific provision donating power to the President to nominate a person as his associate to occupy the office of the President. That is why Subsection 2 of Section 142 mandates that the requirements of qualification and disqualification attaching to the occupier of seat of President also applies to the holder of the office of Vice-President. It is therefore my view that Section 142(1) of the Constitution does not introduce the issue of nomination or sponsorship of a Vice-President so as to enlarge the scope of qualifications or disqualifications applicable to the seat of President. There cannot therefore be a disqualifying factor of a candidate for the office of President outside those specified in Sections 131 and 137 of the Constitution. It can safely be said that those provisions have sufficiently and conclusively covered the field until there is an amendment. See A.G. Abia v. A.G. Federation (2002) 5 NWLR (pt. 763) 204 at 391 - 392; PDP v. INEC & Ors (supra).

As a fall out to my findings above, I hold the firm view that the issue of nomination or sponsorship of the 4th Respondent being a pre-election matter ought to have been ventilated by the Petitioner before the Federal High

Court, as this Court has no original jurisdiction to delve into the matter. Even if, this Court has such jurisdiction, the cause of action being on a pre-election matter is statute barred by virtue of Section 285(9) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended).

Having found as above, it is my view that the two Motions filed by the 1st Respondent, 3rd and 4th Respondents on the 07/5/23 and 12/5/2023 respectively, have merit. Accordingly, I find that the petition is liable to be struck out for being incompetent."

Particulars of Error

1. The provisions of Sections 142(1) and (2) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) provides additional qualification and disqualification criteria to the extent that a candidate for election to the office of the President has to "nominate" another **candidate** as his associate who shall run with him in the election as the Vice-President.
2. Section 152 of the Electoral Act, 2022 defines "candidate" as one who has secured the nomination of a political party to contest an election for any elective office.
3. Section 142(2) of the Constitution incorporates the listed qualifying/disqualifying factors contained in Sections 131 and 137 of the Constitution of the Federal Republic of Nigeria, 1999 (as amended).

4. Sections 131 and 137 of the Constitution are not the only qualifying/disqualifying provisions applicable to the office of the President and Vice President of the Federal Republic of Nigeria.
5. Section 33 of the Electoral Act, 2022, refers to ***candidate*** of a political party whose name has been submitted under Section 29 of the Act.
6. The 5th Respondent's name was submitted by the 2nd Respondent under Section 29 of the Electoral Act, 2022 and after his withdrawal, 5th Respondent was not duly replaced within 14 days as required by the law.
7. All the provisions of Chapter 6 of the Constitution of the Federal Republic of Nigeria 1999 (as amended) are mandatory and enforceable.
8. The Appellant's Petition relates to qualification/disqualification as constitutionally required and certainly not a pre-election matter.
9. 1st Respondent declaring and returning 3rd Respondent to the office of President of Federal Republic of Nigeria without a constitutionally recognised Vice-President is null and void.

GROUND TWO

Error in Law

The learned Justices of the court below, erred in law when on the basis of the respective Motions (seeking to strike out the Petition) filed on 7/5/2023 and 12/5/2023 by the 1st, 3rd and 4th Respondents, held in pages 379-380 of the Judgment:

"As a fall out to my findings above, I hold the firm view that the issue of nomination or sponsorship of the 4th Respondent being a pre-election matter ought to have

been ventilated by the Petitioner before the Federal High Court, as this Court has no original jurisdiction to delve into the matter. Even if, this Court has such jurisdiction, the cause of action being on a pre-election matter is statute barred by virtue of section 285(9) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended)."

Particulars of Error

- 1) Sections 131 and 142 (1) of the 1999 Constitution are inextricably linked and neither can be confined as a pre-election matter, as these qualifications are conditions precedent to for being elected to the office of President.
- 2) The Appellant's Petition was not one founded solely on nomination, but primarily that the 3rd Respondent contested the Presidential Election without a lawful Associate running as his Vice-President.
- 3) The withdrawal of the 5th Respondent and the expiry of 14 days permissible for changing a withdrawn or dead candidate under Section 33 of the Electoral Act, 2022, made 3rd Respondent election and return invalid.
- 4) By the clear provision of Section 239(1) (a) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), the Court of Appeal has original jurisdiction to hear and determine whether the 3rd and 4th Respondents were validly elected to the office of President and Vice President respectively.
- 5) By the clear provision of Section 239(1) (a) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), the Court of Appeal has original jurisdiction to hear and determine whether the

- 3rd and 4th Respondents were validly elected to the office of President and Vice President respectively.
- 6) The declaration and return of the 3rd and 4th Respondents is in violation of the provisions of Section 142(1) and (2) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended).
 - 7) The purported election of the 3rd respondent without the constitutionally required Vice President disqualifies him from being returned as the elected President.
 - 8) The Appellant's Petition is not predicated on Section 285(9) and 285 (14) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), but section 134(1) (a) of the Electoral Act, 2022, as well as Sections 131, 137 and 142 of the Constitution.
 - 9) Appellant's petition is neither a Pre – election matter and not statute – barred.
 - 10) The issue of qualification of 3rd and 4th Respondents for the Presidential election is duly brought as a post-election dispute.
 - 11) The Appellant's Petition was filed within the ambit of the provisions of Sections 131(c) and 142 of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) as well as Sections 31, 33 and 134(1) (a) of the Electoral Act, 2022.

GROUND THREE

Error in Law

The learned Justices of the court below, erred in law and occasioned a miscarriage of justice against the Appellant when in granting 2nd Respondent's Motion seeking to strike out paragraphs of Petition (filed on 8/5/2023) they wrongly held (at Page 399 of the Judgment)

"On the issue of locus standi, I had also held in the previous Motions filed on the 7/2/23. 12/5/23 that, issues of nomination or sponsorship of candidate by political parties for an election come under pre-election matters. It is settled that, the issue of nomination of candidates by substitution is purely a pre-election matter, the only person with the locus standi to challenge the nomination is an aspirant who participated in the process of such nomination."

Particulars of Error

- 1.) The qualifications contained in Sections 131 and 142 (1) are conditions precedent to contesting and being declared and returned as elected to the office of President.
- 2.) The Appellant's Petition is that the 3rd Respondent contested the Presidential Election and was declared and returned elected without an associate/candidate running along with him as his Vice-Presidential candidate.
- 3.) The 5th Respondent withdrew as a Vice-Presidential candidate but was replaced by 4th Respondent outside the 14 days provided by Section 33 of the Electoral Act, 2022.
- 4.) The Appellant participated in the presidential election held on 25th February, 2023 and Section 134(1)(a) of the Electoral Act, 2022, Sections 142(1) and 239 (1)(a) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) conferred *locus standi* on the Appellant to challenge the election and return of the 3rd and 4th Respondents as the President and Vice President of Federal Republic of Nigeria.

- 5.) The Petition not being a pre-election matter, and the Appellant having participated in the election has unfettered *locus standi* to present the same by virtue of section 133(1) of the Electoral Act, 2022.

GROUND FOUR

Error in Law

The learned Justices of the court below erred in law and occasioned miscarriage of justice against the Appellant in granting the 5th Respondent's Motion (filed on 15/5/2023) seeking to dismiss the Petition and or strike out the name of the 5th Respondent, (when they held at Pages 408 of the Judgment) thus:

'Indeed, a holistic reading of the facts of this petition does not disclose any complaint against the 5th Respondent. The only fact that relates to the 5th Respondent, relevant to the petition, is the act of withdrawal of his candidacy as the running mate of the 3rd Respondent. That is an act that occurred within the pre-election period, therefore, cannot amount to any act done by the 5th Respondent at the election. It cannot therefore ground any complaint by the Petitioner against the 5th Respondent in an election petition. ... It is therefore my finding that, there is no any claim on the 5th Respondent.'

Particulars Of Error

- 1) The Supreme Court in **Jegede v. INEC [2021] LPELR-55481 SC** held that parties must be duly before the Court before any allegations can be made against them.
- 2) Appellant's Petition highlighted copious allegation of actions by 5th Respondent material to the election in question.
- 3) The lower court on its own referred to the 5th Respondent's withdrawal as "**relevant to the petition**".
- 4) The withdrawal of the 5th Respondent is a relevant fact as he was the last known running mate to the 3rd Respondent and therefore a necessary party, even if only a nominal party.
- 5) Allegations were made against the 5th Respondent whose withdrawal is the basis on which the Appellant challenged the qualification of the 3rd Respondents.

GROUND FIVE

Error in Law

The learned Justices of the court below erred in law and misunderstood the Appellant's course of action as presented in its Petition thereby occasioned a miscarriage of justice against the Appellant, when they held at Pages 400-401 of the Judgment:

'It is clear therefore, that a political party, such as the Petitioner herein, only has the locus standi to file a pre-election matter when the situation affects its or its own candidate by virtue of Section 285(14)(c) of the 1999 Constitution. That being so, as in the instant petition where the grounds of the petition is rooted on

the nomination or sponsorship of the candidate of another political party, this petitioner will have no *locus standi* to institute the action, be it in the Federal High Court or an Election Tribunal. For that reason, it is my view the cause of action in this petition being on the nomination and sponsorship of the 3rd and 4th Respondents by the 2nd Respondent/Applicant, the Petition is incompetent for lack of *locus standi* on the petition (sic) to institute same. It is also liable to be struck out for being incompetent."

Particulars Of Error

- 1) Appellant's Petition is about 3rd and 4th Respondents' participating in the Presidential Election and being returned as elected without the constitutional qualification.
- 2) The Appellant having participated in the presidential election held on 25th February, 2023 has the requisite *locus standi* to challenge the return of the 3rd Respondent as the winner of the election.
- 3) The provision of section 134 (1) (a) of the Electoral Act, 2022 read in conjunction with Sections 131, 142(1) and 239 (1)(a) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) conferred *locus standi* on the Appellant to challenge the qualification and subsequent purported election of the 3rd and 4th Respondents as the President and Vice President of Federal Republic of Nigeria.

GROUND SIX

Error in Law

The Learned Justices of the court below erred in law and occasioned a miscarriage of justice against the Appellant by holding that the complaint of the Appellant in its Petition is solely on double nomination when they held:

"On that note, I hereby hold that the Petitioner failed to prove the lone ground of its petition, to the effect that the 3rd and 4th Respondents were not qualified to contest the Presidential Election held on 25th February, 2023 for the reason of double nomination of the 4th Respondent. Having resolved the sole issue of the petition against the Petitioner, this petition is also devoid of any merit.'

Particulars of Error

- 1) The core complaint of the Appellant in the Petition is to the effect that the 3rd Respondent did not have a running mate as provided by Section 142 (1) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended).
- 2) The unchallenged evidence of PW1 and Exhibit PA2 put beyond doubt that the 5th Respondent withdrew as associate of the 3rd Respondent on 24th June, 2022, and there was no valid change as stipulated in Section 33 of the Electoral Act, 2022.
- 3) The 4th Respondent was purportedly changed pursuant to Section 33 of the Electoral Act, 2022 by 3rd Respondent as a purported

replacement of the 5th Respondent on 14th July, 2022, outside the 14 days stipulated by the Law.

- 4) The 3rd Respondent was at the time of the Presidential election not qualified to contest the election.
- 5) Even the learned Justices of the Court below affirmed in their ruling that the Petition was not solely based on double nomination when they held thus:

"One other aspect alleged by the Petitioner on its claim of invalid nomination of the 3rd and 4th Respondents is that, the 2nd Respondent did not comply with section 33 of the Electoral Act in the nomination of the 4th Respondent as Vice-Presidential candidate."

GROUND SEVEN

Error In Law

The learned Justices of the court below erred in law and occasioned miscarriage of justice against the Appellant when it wrongly found that the grouse of the Appellant is about the failure of the 2nd Respondent to conduct a fresh primary election and therefore held as follows at Pages 484-485 of the Judgment:

"One other aspect alleged by the Petitioner on its claim of invalid nomination of the 3rd and 4th Respondents is that, the 2nd Respondent did not comply with section 33 of the Electoral Act in the nomination of the 4th Respondent as Vice-Presidential candidate. That, after the withdrawal of the 5th Respondent, the 2nd Respondent should have conducted a fresh primary election within 14 days

for the purposes of nominating a new Vice-Presidential Candidate.

Now, Section 33 of the Electoral Act, 2022 stipulates that:

A political party shall not be allowed to change or substitute its candidate whose name has been submitted under Section 29 of this Act, except in the case of death or withdrawal by a candidate:

Provided that in the case of such withdrawal or death of a candidate, the political party affected shall, within 14 days of the occurrence of the event, hold a fresh primary election to produce and submit a fresh candidate to the Commission for the election concerned.

The interpretation of this provision does not, in my view, cause any difficulty as to require the application of any technical rule of construction. Therefore, a literal interpretation will suffice. It therefore means that, where a political party has submitted the name of a candidate pursuant to section 29 of the Electoral Act, (Supra), it cannot be allowed to substitute or change that candidate except in the event of death or withdrawal of such candidate. By the proviso thereto, the political party affected, is enjoined to conduct a fresh primary election for the purpose of producing a new or fresh candidate to submit to the Electoral Commission. The

grouse of the Petitioner here is that, the 5th Respondent withdrew his nomination as Vice-Presidential candidate of the 2nd Respondent but the 2nd Respondent did not conduct another primary election for the purpose of producing a new Vice-Presidential Candidate within 14 days prescribed by section 33 of the Electoral Act.

It should be remembered that by section 142 (1) of the 1999 Constitution (sic), a Presidential candidate for election to the office of President has the sole discretion, authority or power of nominating his associate who shall run with him in the election as Vice-President. The choice of nomination of a Vice-Presidential candidate is, not the product of any primary election. Therefore, in my view, the requirement to conduct a fresh primary election does not apply to the nomination of a Vice-Presidential candidate."

Particulars of Error

- 1) Appellant's Petition is all about 3rd Respondent contesting the Presidential election and being returned without the required vice – Presidential candidate.
- 2) Sections 31 and 33 of the Electoral Act, 2022, contain exhaustive provisions for withdrawal and change of candidate (be it Presidential or Vice-Presidential candidate).
- 3) The 5th Respondent's name was submitted to the 1st Respondent in accordance with Section 29 of the Electoral Act, 2022.

- 4) The 5th Respondent withdrew as Vice-Presidential Candidate, pursuant to Section 33 of the Electoral Act, 2022.
- 5) The 3rd Respondent failed to comply with the proviso to Section 33 of the Electoral Act in purportedly changing the 5th Respondent.
- 6) The Appellant never argued that the 2nd Respondent ought to conduct a fresh primary election to change the 5th Respondent.

GROUND EIGHT

Error in Law

The learned Justices of the court below erred in law and reached a perverted decision against the Appellant when they replaced and interpreted the constitutionally provided word "candidate" in Section 142, of the Constitution of the Federal Republic of Nigeria, 1999, with an imported word "person" in their Ruling at Page 379 of the Judgment:

Section 142(1) is a specific provision donating power to the President to nominate a "person" (sic) as his associate to occupy the office of the President. Emphasis OURS.

Particulars of Error

- 1) The drafters of the Constitution used the word candidate copiously in Section 142 (1), Constitution of the Federal Republic of Nigeria, 1999 (as Amended).
- 2) The court misapplied the provisions of Section 142 of the Constitution by their use of person in place of "***Candidate***".
- 3) The word person is radically different from the word candidate.

GROUND NINE

Error in Law

The learned Justices of the lower court erred in law and occasioned a miscarriage of justice against the Appellant when they wrongly held at Page 379 of the Judgment:

"I am of the view that the above cited provision of the Constitution does not create additional qualifications or disqualifications for a candidate contesting for the office of President of Nigeria. Furthermore, Section 142 of the 1999 Constitution (sic) read along with Section 141 create the offices of President and Vice-President. Section 142(1) is a specific provision donating power to the President to nominate a person as his associate to occupy the office of the President. That is why Subsection 2 of Section 142 mandates that the requirements of qualification and disqualification attaching to the occupier of seat of President also applies to the holder of the office of Vice-President. It is therefore my view that Section 142(1) of the Constitution does not introduce the issue of nomination or sponsorship of a Vice-President so as to enlarge the scope of qualifications or disqualifications applicable to the seat of President. There cannot therefore be a qualifying factor of a candidate for the office of President outside those specifies in Sections 131 and 137 of the Constitution."

Particulars of Error

1. The provisions of Sections 142(1) and (2) of the Constitution of the Federal Republic of Nigeria, 1999 (as amended) provides for additional qualifications and disqualifications to the extent that a Presidential candidate for election to the office of the President has to "nominate" a candidate as his associate who shall run with him in the election as a Vice-Presidential candidate.
2. Section 152 of the Electoral Act, 2022 defines "candidate" as one who has secured the nomination of a political party to contest an election for any elective office.
3. Section 33 of the Electoral Act, 2022, refers to candidate of a political party whose name has been submitted under Section 29 of the Act.
4. 5th Respondent's name was submitted by the 2nd Respondent under Section 29 of the Electoral Act, 2022 and 5th Respondent was not replaced within 14 days as required.
5. Qualification and disqualifications criteria are constitutional landmark and do exist on their own

GROUND TEN

Error in Law

The Hon. court below erred in law when it abandoned its duty and jurisdiction of hearing and determining the Appellant's question of if 3rd and 4th Respondents were "***validly elected to the office of President and Vice President under this Constitution***" as stipulated by S. 239(1) of the Constitution of the Federal Republic of Nigeria 1999 (as amended)

Particulars of Error

- 1) The Hon. Court below became interested in technical issues solely beneficial to 3rd and 4th Respondents rather than concentrating on whether 3rd and 4th Respondents were validly elected.
- 2) "**Validly elected**" encompasses being qualified to contest the election.
- 3) Validity of election include the threshold qualifications and disqualifications as stipulated in the Constitution.
- 4) The approach of court below was to avoid the weighty issue of "**validly elected**" through imputing technical elevation of Pre – election issue

4. RELIEFS SOUGHT

- i) An Order of the Hon. Court allowing this appeal.
- ii) An Order of the Hon. Court setting aside the decisions of the lower court.
- iii) An Order of the Hon. Court granting all the reliefs sought in the Appellant's Petition at the court below:
 - (a) The 3rd Respondent was not qualified to contest as the Presidential Candidate of the 2nd Respondent as 25th February, 2023, when the Presidential Election was conducted by the 1st Respondent in the Federal Republic of Nigeria, having violated the provisions of section 142 (1) of the Constitution of the Federal Republic of Nigeria, 1990, as amended.

- (b) A DECLARATION that the return of the 3rd Respondent by the 1st Respondent as the President elect of the Federal Republic of Nigeria is null, void and of no legal effect whatsoever, the 3rd Respondent having violated the provisions of section 142 (1) of the Constitution of the Federal Republic of Nigeria, 1999, as amended and the 4th Respondent having violated the provision of Section 35 of the Electoral Act, 2022.
- (c) The 4th Respondent was not qualified to contest as the Vice-Presidential Candidate of the 2nd Respondent as at 25th February, 2023, when the Presidential Election was conducted by the 1st Respondent in the Federal Republic of Nigeria, having violated the provisions of Section 35 of the Electoral Act, 2022.
- (d) The declaration and return of the 3rd Respondent by the 1st Respondent on 1st March, 2023, as the President-elect of the Federal Republic of Nigeria is invalid by reason of non-compliance with the provisions of the Constitution of the Federal Republic of Nigeria, 1999; and the Electoral Act, 2022.
- (e) A DECLARATION that having regard to the joint-ticket principle enshrined in Section 142 (1) of the Constitution of the Federal Republic of Nigeria, 1999, the withdrawal of the 5th Respondent as the Vice-Presidential candidate of the 2ⁿ Respondent, by

operation of law amounted to automatic withdrawal and invalidation of the candidature of the 3rd Respondent as the Presidential Candidate of the 2nd Respondent for the Presidential Election conducted by the 1st Respondent on the 25th day of February, 2023.

- (f) A DECLARATION that arising from the invalidity of the 3rd Respondent's nomination, the 1st Respondent ought not to have included the name, or the abbreviation of the name of the logo of the 2nd Respondent in the ballot papers another election materials used by the 1st Respondent for th conduct of the Presidential Election held on the 25th day o February, 2023.
- (g) The 4th Respondent was not qualified to contest as the Vice Presidential Candidate of the 2nd respondent as at 25th February, 2023, when the Presidential Election was conducted by the 1st Respondent in the Federal Republic of Nigeria, having violated the provisions of Section 35 of the Electoral Act, 2022.
- (h) AN ORDER NULLIFYING and VOIDING all the votes scored by the 3rd Respondent in the Presidential Election conducted by the 1st Respondent on 25th February, 2023, in view of his non-qualification as a candidate of the 2nd Respondent.
- (i) UPON the grant of Prayer (v) above, AN ORDER NULLIFYING AND/OR SETTING ASIDE the

return/declaration of the 3rd Respondent as the winner of the Election conducted by the 1st Respondent for the Office of the President of the Federal Republic of Nigeria, on the 25th day of February, 2023, same having been made in violation of the provisions of Section 142 (1) of the Constitution of the Federal Republic of Nigeria, 1999; and Section 35 of the Electoral Act, 2022.

- (j) UPON the grant of prayers (v) and (vi) above, and in the absence of the 3rd Respondent's participation in the Presidential Election held on 25th February, 2023, pursuant to S136 (2) of the Electoral Act, AN ORDER, declaring the candidate with the next highest number of votes as the winner of the election.

5. **NAMES OF THE PARTIES AFFECTED BY THIS APPEAL.**

APPELLANTS

ADDRESS

ALLIED PEOPLES' MOVEMENT	Chukwuma-Machukwu Ume, SAN, FCI Arb. Andrew Malgwi, SAN Mrs. Ndidi Patience Ume Esq. Ejike Ejiofor Esq. Udodirim Bahsor-Nyiam Esq. Hope Eke Esq. Jerome T Mukang Esq. Omebe Kyrian Ekpereamaka Esq. Maryann Chisom Akubudike Esq.
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chukwuma-machukwu ume, SAN & co.

(Firm of Lawyers, Arbitrators, Notary Public,
Trade Mark Agents & *Pro bono* Advocates)

Counsel to the Appellant.

B12 AMAC Plaza, Wuse Zone 3, Abuja,

RESPONDENTS

ADDRESS

1. **INDEPENDENT NATIONAL
ELECTORAL COMMISSION (INEC)**

INEC Headquarters
Plot 436, Zambezi Crescent,
Maitama, Abuja.

2. **ALL PROGRESSIVES CONGRESS (APC)**

APC National Secretariat,
40 Blantyre Street,
Off Adetokunbo Ademola
Crescent, Wuse 11, Abuja.

3. **TINUBU BOLA AHMED**

C/o His Counsel,
Chief Wale Olanipekun, CFR, SAN
Wale Olanipekun & Co
God's Grace House
No. 6 Oshakati Close
Off Constantine Street
Wuse Zone 4, Abuja
Or
APC National Secretariat,
40 Blantyre Street,

Off Adetokunbo Ademola Crescent,
Wuse 11, Abuja

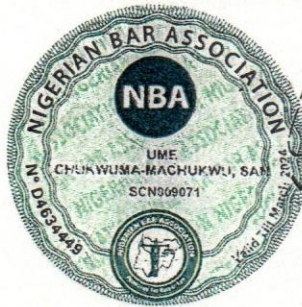
4. SENATOR KASHIM SHETTIMA

C/O All Progressives Congress
APC National Secretariat,
40 Blantyre Street,
Off Adetokunbo Ademola Crescent,
Wuse 11, Abuja

5. KABIR MASARI

C/O All Progressives Congress
APC National Secretariat,
40 Blantyre Street,
Off Adetokunbo Ademola Crescent,
Wuse 11, Abuja

DATED THIS 19TH SEPTEMBER, 2023



[Signature]
Chukwuma-Machukwu Ume, SAN, FCI Arb.

Andrew Malgwi, SAN

Mrs. Ndidi Patience Ume Esq.

Ejike Ejiofor Esq.

Udodirim Bahsor-Nyiam Esq.

Hope Eke Esq.

Jerome T Mukang Esq.

Omebe Kyrian Ekpereamaka Esq.

Maryann Chisom Akubudike Esq.

chukwuma-machukwu ume, SAN & Co.

(Firm of Lawyers, Arbitrators, Notary Public,
Trade Mark Agents & *Pro bono* Advocates)

Counsel to the Appellant.

B12 AMAC Plaza, Wuse,

Zone 3, Abuja,

ndidpatienceume@nigerianbar.ng

07081280000

**FOR SERVICE ON:
THE RESPONDENTS**

INDEPENDENT NATIONAL ELECTORAL COMMISSION (INEC)

Headquarters

Plot 436, Zambezi Crescent,

Maitama, Abuja.

ALL PROGRESSIVES CONGRESS (APC)

APC National Secretariat,

40 Blantyre Street,

Off Adetokunbo Ademola

Crescent, Wuse 11, Abuja.

TINUBU BOLA AHMED

C/o His Counsel,

Chief Wale Olanipekun, CFR, SAN

Wale Olanipekun & Co

God's Grace House

No. 6 Oshakati Close

Off Constantine Street

Wuse Zone 4, Abuja

Or

APC National Secretariat,

40 Blantyre Street,

Off Adetokunbo Ademola Crescent,

Wuse 11, Abuja

SENATOR KASHIM SHETTIMA

C/O All Progressives Congress

APC National Secretariat,

41 Blantyre Street,

Off Adetokunbo Ademola Crescent,

Wuse 11, Abuja

KABIR MASARI

C/O All Progressives Congress

APC National Secretariat,

41 Blantyre Street,

Off Adetokunbo Ademola Crescent,

Wuse 11, Abuja