

CTS

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

SUIT NO: FHC/ ABJ/ CS/ 1376/ 2021

BETWEEN:

- |  |   |  |
|--|---|--|
| <ol style="list-style-type: none"> <li>1. HARRISON JALLA</li> <li>2. CHIEF VICTOR RUMSON BARIBOTE</li> <li>3. AUSTIN POPO</li> <li>4. NATIONAL ASSOCIATION OF NIGERIAN</li> <li>5. FOOTBALLERS (NANF)</li> </ol> <p>(Trading in the name and style of the Professional Football Association of Nigeria (PFAN))</p> | } | <p>CLAIMANTS/<br/>RESPONDENTS/<br/>RESPONDENTS</p> |
|--|---|--|

AND

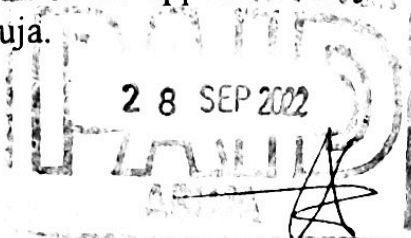
- |  |   |   |
|--|---|---|
| <ol style="list-style-type: none"> <li>1. NIGERIA FOOTBALL ASSOCIATION</li> </ol> <p>(Trading under the name and style of the Nigeria Football Federation (NFF))</p> | } | <p>DEFENDANT/APPELLANT/<br/>APPLICANT</p>           |
| <ol style="list-style-type: none"> <li>2. AMAJU PINNIK</li> <li>3. HON. MINISTER FOR SPORT AND YOUTH DEVELOPMENT</li> </ol>  | } | <p>DEFENDANTS/<br/>RESPONDENTS/<br/>RESPONDENTS</p> |

MOTION ON NOTICE  
BROUGHT PURSUANT TO SECTION 36 (1) OF THE 1999  
CONSTITUTION (AS AMENDED); ORDER 32 RULE 1 AND 2 OF THE  
FEDERAL HIGH COURT (CIVIL PROCEDURE) RULES 2019 AND  
UNDER THE INHERENT JURISDICTION OF THIS HONOURABLE  
COURT.

TAKE NOTICE that this Honourable Court will be moved on ..... the ..... day ..... 2022 at the hour of 9 O'clock in the forenoon or so soon thereafter as Counsel may be heard on behalf of the Defendant/Appellant/Applicant herein praying this Honourable Court for the following Orders:

1. AN ORDER staying execution of the order contained in the ruling of this Honourable Court delivered on the 15<sup>th</sup> day of September, 2022, pending the hearing and determination of the appeal filed by the Appellant/Applicant to the Court of Appeal, Abuja.

28 SEP 2022



120716147288

2. **AN ORDER of injunction** restraining the Respondents/Respondents, their agents, servants, privies or whosoever and howsoever described from continuing or commencing or initiating or taking any step (s) or doing anything to enforce the orders made in the said ruling delivered by this Honourable Court on the 15<sup>th</sup> day of September 2022, pending the hearing and determination of the appeal filed by the Appellant/Applicant to the Court of Appeal, Abuja.
3. **AND FOR SUCH FURTHER OR OTHER ORDERS** as this Honourable Court may deem fit to make in the circumstance.

**GROUND UPON WHICH THIS APPLICATION IS BROUGHT ARE AS FOLLOWS:**

- (a) That a ruling was delivered by this Honourable Court on the 15<sup>th</sup> day of September, 2022 granting injunctive order to maintain the status quo ante against the appellant/applicant herein.
- (b) That the appellant/applicant being dissatisfied with the said ruling, appealed against the said ruling to the Court of Appeal Abuja.
- (c) The appellant/applicant has valid and substantial grounds of appeal with chances of success at the Court of Appeal.
- (d) That this Honourable court, among other things, granted an order not prayed for and this court therefore lacked the competence and jurisdiction to make the order it did.
- (e) The order when taken altogether contradicts itself and alters, contradicts and extends the status quo ante which will gravely and irreparably prejudice the Applicant's right and interest.
- (f) That this application ought to be granted, if it is not granted, the orders contained in the said ruling will be executed and it would render the appeal filed by the appellant/applicant nugatory and foist upon the Court of Appeal a situation of complete helplessness.
- (g) That if this application is not granted the respondents/respondents would take steps to enforce the orders made in the said ruling and render the appeal filed nugatory.

Dated this 28<sup>th</sup> day of September, 2022.



**Patrick Mekako Esq.**  
Taruayen Oke-Oghene Sonia ✓  
APPELLANT'S COUNSEL  
Patrick Mekako & Associates  
Markvia Plaza  
Plot 3 DSC Expressway  
Opp. Eketé Inland Junction  
Udu L.G.A, Bayelsa State.  
08068463390;  
Mekakop777@gmail.com

Whose address for service  
within Abuja Jurisdiction is:

C/O:

Desmond C. Adams Esq.  
No. 3 All Saints Way  
Bwari, Abuja.  
08169345861.

**For Service On:**

The 1<sup>st</sup> -5<sup>th</sup> Respondents:

C/O: their counsel  
Dr. Celsus Ukpong  
F.F. Ibritam & Associates  
Block 12 Flat 9 Shendam Close,  
off Emeka Anyaoku  
Street, Area 11, Garki, Abuja.

**6<sup>th</sup> Respondent**  
AMAJU PINNIK  
Olusegun Obasanjo Way  
Zone 7, Abuja

**7<sup>th</sup> Respondent**  
Federal Ministry of Youths  
And Sports Development  
FCT, Port Harcourt.

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

**BETWEEN:**

**SUIT NO: FHC/ ABJ/ CS/ 1376/ 2021**

- |  |   |  |
|--|---|--|
| <ol style="list-style-type: none"><li>1. <b>HARRISON JALLA</b></li><li>2. <b>CHIEF VICTOR RUMSON BARIBOTE</b></li><li>3. <b>AUSTIN POPO</b></li><li>4. <b>NATIONAL ASSOCIATION OF NIGERIAN</b></li><li>5. <b>FOOTBALLERS (NANF)</b><br/>(Trading in the name and style of the Professional Football Association of Nigeria (PFAN))</li></ol> | } | <b>CLAIMANTS/<br/>RESPONDENTS/<br/>RESPONDENTS</b> |
|--|---|--|

**AND**

- |  |   |   |
|--|---|---|
| <ol style="list-style-type: none"><li>1. <b>NIGERIA FOOTBALL ASSOCIATION</b><br/>(Trading under the name and style of the Nigeria Football Federation (NFF))</li></ol> | } | <b>DEFENDANT/APPELLANT/<br/>APPLICANT</b>           |
| <ol style="list-style-type: none"><li>2. <b>AMAJU PINNIK</b></li><li>3. <b>HON. MINISTER FOR SPORT AND YOUTH DEVELOPMENT</b></li></ol>                                 | } | <b>DEFENDANTS/<br/>RESPONDENTS/<br/>RESPONDENTS</b> |

**AFFIDAVIT IN SUPPORT OF MOTION FOR STAY OF EXECUTION.**

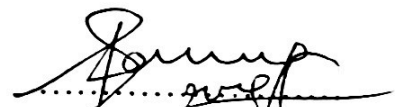
I, **CHIEF DESMOND C. ADAMS**, male, Christian, citizen of the Federal Republic of Nigeria, Legal Practitioner residing at Plot 49 F Close, PW Kubwa, Abuja, do hereby make oath and state as follows:-

1. That I am a Legal Practitioner and associate in the Law firm of of Patrick Mekako and Associates, Plot 3 DSC Expressway, Udu Local Government Area Delta State, Solicitors to the Appellant /Applicant herein and by virtue of my position, I am conversant with the facts of this case and those leading to this application.
2. That I have the authority and consent of the Claimants and my employers to depose to this affidavit.
3. That by a Writ of Summons commissioned on the 5<sup>th</sup> of November, 2021, the Plaintiffs/ Respondents/ Respondents initiated this suit against the Defendants, including the Defendant / Appellant/ Applicant; seeking for the reliefs endorsed in the said Writ of Summons.



4. That the Plaintiffs/ Respondents thereupon, took no further step in prosecuting the said suit; only to file the ex-parte application for interim injunction against the Appellant /Applicant and others.
5. That the learned trial Judge did not grant the relief sought on the face of the ex-parte application but rather ordered that the parties maintain the status quo ante pending the final order of the Honourable Court and adjourned the matter to the 31<sup>st</sup> of October, 2022. The said Ex-parte Order is attached herewith as **EXHIBIT "A"**.
6. That there was no prayer before the lower Court asking for maintaining of the *status quo ante*.
7. By granting the injunctive order and adjourning the matter to 31/10/2022, the trial Court by implication made the ex-parte order to last from 15/09/2022 till 31/10/2022, which is for a period of 46 days.
8. That the action of the Plaintiffs/ Respondents basically alleges certain infractions by the Defendant/ Applicant, including the 2<sup>nd</sup> Defendant/ Respondent (who are the incumbent Executives of the Nigerian Football Federation (NFF) and whose 4 years tenure will elapse on the 30/09/2022; which will usher in a new set of executives for the NFF.
9. The *status quo ante* as at the 05/11/2021 when the writ of summons which initiated the instant suit was filed, was that, the Applicants and the 6<sup>th</sup> Respondent and others were the duly elected Executives of the Appellant whose statutory tenure was and is still running and is due to expire, lapse and come to an end on the 30/09/2022.
10. The order of the learned trial Court, for the maintenance of the *status quo ante* and by adjourning the suit to the 31/10/2022 *suo motu*, has the implication of extending the statutory period / tenure of the 6<sup>th</sup> Respondent and his Executives from 30/09/2022 when same is due to expire / elapse, to an uncertain / indefinite period.
11. That this situation will cause serious uncertainty and chaos in the NFF and greatly prejudice the right and interest of the Applicants and indeed other relevant stakeholders to the various offices of the NFF Executive which will be due for fresh elections on the 30/09/2022 when the tenure of the current executives will elapse / expire.

12. That the aforesaid grave consequences were never prayed for in the ex-parte application of the Claimants/ Respondents but was created by the decision handed down by the learned trial Court, will have grave consequences adversely affect, halt and distort football administration in Nigeria; it will also cause serious complications, helplessness and controversies in the Football community as Executives whose statutory tenure would elapse on 30/09/2022 would be forced to remain in office illegally.
13. That the Appellants/ Applicants being dissatisfied with the judgment have appealed to the Court of Appeal in exercise of their Constitutional rights of appeal. Attached herewith as **Exhibit "B"** is a **Certified True Copy of the said Notice of Appeal.**
14. That the Applicants have valid and substantial grounds of appeal with chances of success at the Court of Appeal.
15. That granting stay of execution of the order / ruling of this Honourable Court will meet the justice of this case; but refusal of stay will render the appeal nugatory.
16. That the Applicants' rights to appeal the ruling to the Court of Appeal is in exercise of their Constitutional rights.
17. That granting the stay of execution of the orders will not prejudice the Claimants; as it concurs with the status quo ante which the Plaintiffs / Defendants had long been aware of; and it will meet the justice of the case to stay execution of the judgment in order not to render the appeal nugatory.
18. That I also know that the Applicants are willing to expeditiously prosecute the appeal.
19. That I do solemnly and sincerely swear and I make this solemn declaration contentiously believing the content to be true and in accordance with the Oaths Act.

  
 .....  
**DEPONENT.**

Sworn to at the Federal High Court Registry, Abuja  
 This ..... 23<sup>rd</sup> day of ..... Sept. ...., 2022

**BEFORE ME,**  
**FEDERAL HIGH COURT ABUJA**  
 Commissioner For Oath  
 \_\_\_\_\_  
 Date  
**COMMISSIONER FOR OATHS**

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

**BETWEEN:**

**SUIT NO: FHC/ ABJ/ CS/ 1376/ 2021**

1. HARRISON JALLA
2. CHIEF VICTOR RUMSON BARIBOTE
3. AUSTIN POPO
4. NATIONAL ASSOCIATION OF NIGERIAN
5. FOOTBALLERS (NANF)  
(Trading in the name and style of the Professional Football Association of Nigeria (PFAN))

**CLAIMANTS/  
RESPONDENTS/  
RESPONDENTS**

**AND**

1. NIGERIA FOOTBALL ASSOCIATION  
(Trading under the name and style of the Nigeria Football Federation (NFF))

**DEFENDANT/APPELLANT/  
APPLICANT**

2. AMAJU PINNIK
3. HON. MINISTER FOR SPORT AND YOUTH DEVELOPMENT

**DEFENDANTS/  
RESPONDENTS/  
RESPONDENTS**

**WRITTEN ADDRESS IN SUPPORT OF MOTION**

**1.0 INTRODUCTION**

- 1.1 This is an application brought on behalf of the Applicant praying this Honourable Court for the reliefs shown on the face of the motion paper.
- 1.2 The application is supported by a 19 paragraphed affidavit. The Applicant relies on all the paragraphs of the affidavit and the 2 exhibits annexed thereto.

**2.0 ISSUES FOR DETERMINATION**

- 2.1 The Applicant submits that the only issue arising for determination in the motion is:

**Whether the Defendant/Appellant/Applicant has shown special circumstances in its affidavit for the Court to grant the order sought in this application?**

**3.0 SUBSTANCE OF PLAINTIFFS/APPLICANTS' ARGUMENTS ON THE ISSUE:**

3.1 This application is for the Court to stay execution of the order / ruling pending the hearing and determination of the appeal. This application calls for the exercise of the discretion of this Honourable Court in favour of the Applicant. In **Vincent Standard Trading Co. Limited vs. Xtodeus Trading CO. (1993) 5 NWLR (Pt. 296) 675**, Per Ogundare, JSC held thus:

*"When it is stated that the circumstances or conditions for granting a stay should be special or strong, we talk it as involving a consideration of some collateral circumstances and perhaps in some cases inherent matters which may, unless the order for stay is granted, destroy the subject matter of the proceedings or foist upon the Court, especially the Court of Appeal, a situation of complete helplessness or render nugatory any order or orders of the Court of Appeal or paralyse in one way or the other, the exercise by the litigant of his constitutional right of appeal or generally provide a situation in which whatever happens to the case, and in particular even if the appellant succeeds in the Court of Appeal, there could be no return to the status quo."*

3.2 My lord, the Applicant has shown in the affidavit that the balance of convenience tilts in its favour as it will suffer immeasurable loss if this application is not granted. A close perusal of the averments in the affidavit viz a viz Exhibits A and B attached thereto would lend credence to the foregoing assertion. We respectfully urge your lordship to so hold.

3.2 We humbly submit that the issues raised above are special and exceptional circumstances which tilts the balance of convenience in granting this application in favour of the Applicants. In **Ajomale vs. Yaduat (No. 2) 1991, (5 NWLR) PT. 191 266 at 291, Paragraph B**, the Supreme Court per Nnaemeka-Agu, JSC stated thus:

*"For a ground of appeal to constitute a special circumstance which will necessitate a grant of stay of execution, it must arise in a type of decision where a stay can be granted and, in relation to the facts and circumstances of the particular case, be such that if it is decided in favour of the appellant some substantial injustice or some irreversible circumstances shall have resulted which would have made it more appropriate had a stay been granted."*

3.3 Further, as can be seen in our affidavit, there are substantial points of law that has been raised on appeal and there is grave danger of the destruction of the res if this application is not stayed.

3.4 In *V.S.T Co. Limited vs. Xtodeus Trading Co.*(Supra) per Ogundare JSC stated at page 688, Paras D-E thus:

*“The Courts discretion to grant a stay of execution must be exercised judiciously and it would be so exercised where it is shown that the appeal involves substantial points of law necessitating the parties and issues being in status quo until the legal issues are resolved.”*

3.5 Furthermore, in *Odedeyi vs. Odedeyi* (2000) 3NWLR (Pt. 650) 655 at 659-660, (2000) 2 SCNJ 131 at 133 per Belgore JSC held thus:

*“A strong and substantial ground of appeal does not necessarily mean the appeal may succeed; certainly, the Court must be wary of such ground so as not to prejudge the substantial appeal. In cases where the res, the subject matter of appeal, is at the risk of destruction if a stay is not granted, or its nature may be altered as to make it irreversible to its original state.....the Court in its discretion will grant a stay of execution pending the determination of the appeal.”*

3.6 We commend the foregoing arguments to your lordship and respectfully urge your lordship to hold that the Applicant has satisfied this Court with the necessary materials in their affidavit in support of the application, to entitle them to a grant of the reliefs sought in this application.

3.7 On the strength of the foregoing, we humbly urge your lordship to answer the lone issue for determination in the affirmative and resolve same in favour of the Applicant by granting the instant motion as prayed.

3.8 We are much obliged, my noble lord.

#### 4.00 CONCLUSION

4.01 The Applicant has shown exceptional circumstances necessitating the grant of this application.

4.02 The Applicant has also sufficiently satisfied all the legal conditions to entitle it to the relief sought.

4.03 In view of the affidavit evidence, the exhibits; and the fuller explanations and analysis in this address, we humbly urge the Honourable court to hold that the Applicant has proved its case against the Defendants and urge on the Honourable court to grant the motion as prayed.

4.04 So may it please my lord.

Dated this 28<sup>th</sup> day of September, 2022.



**Patrick Mekako Esq.**  
Taruayen Oke-Oghenne Sonia ✓  
APPELLANT'S COUNSEL  
Patrick Mekako & Associates  
Markvia Plaza  
Plot 3 DSC Expressway  
Opp. Eketek Inland Junction  
Udu L.G.A, Bayelsa State.  
08068463390;  
Mekakop777@gmail.come

Whose address for service  
within Abuja Jurisdiction is:  
C/O:

Desmond C. Adams Esq.  
No. 3 All Saints Way  
Bwari, Abuja.  
08169345861.

**For Service On:**

The 1<sup>st</sup> -5<sup>th</sup> Respondents:

C/O: their counsel  
Dr. Celsus Ukpong  
F.F. Ibritam & Associates  
Block 12 Flat 9 Shendam Close,  
off Emeka Anyaoku  
Street, Area 11, Garki, Abuja.

**6<sup>th</sup> Respondent**  
AMAJU PINNIK  
Olusegun Obasanjo Way  
Zone 7, Abuja

**7<sup>th</sup> Respondent**  
Federal Ministry of Youths  
And Sports Development  
FCT, Port Harcourt.



**IN THE FEDERAL HIGH COURT OF NIGERIA  
IN THE ABUJA JUDICIAL DIVISION  
HOLDEN AT ABUJA  
ON THURSDAY, THE 15<sup>TH</sup> DAY OF SEPTEMBER, 2022  
BEFORE HIS LORDSHIP, HON. JUSTICE I. E. EKWO  
JUDGE**

**SUIT NO: FHC/ABJ/CS/1376/2021**

**BETWEEN:**

1. HARRISON JALLA
2. CHIEF VICTOR RUMSON BARIBOTE
3. AUSTIN POPO
4. NATIONAL ASSOCIATION OF NIGERIA FOOTBALLERS (NANF)  
(Trading in the name and style of the Professional Football Association of Nigeria (PFAN))

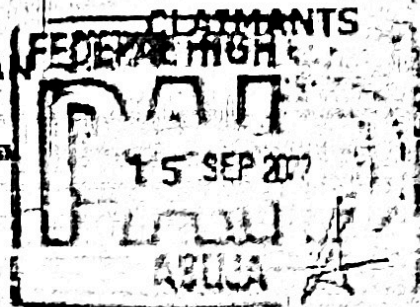
**AND**

1. NIGERIA FOOTBALL ASSOCIATION  
(Trading in the Name and Style of the Nigeria Football Federation (NFF))
2. AMAJU PINNIK
3. HON. MINISTER OF SPORT AND YOUTH DEVELOPMENT

FEDERAL HIGH COURT OF NIGERIA  
Commissioner For Oath

Sign \_\_\_\_\_ Date \_\_\_\_\_

28/9/22

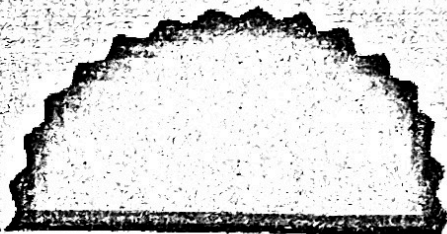


200709595453

**ORDER**

**UPON THE MOTION *EX-PARTE* dated and filed 2<sup>nd</sup> September, 2022 seeking the following Orders:**

1. Order of Interim order restraining the Defendants/Respondents, his Agent, Employees, Staff, Officials or Electoral Committee, Privies from organizing, conducting any election into any executive office of the Nigeria Football Federation pending the hearing and determination of the motion on notice for interlocutory injunction pending before the Honourable Court.
2. And for such further or other orders as this Honourable Court may deem fit to make in the circumstances.



Hon. Justice I. E. Ekwo  
Judge

CERTIFIED TRUE COPY  
FEDERAL HIGH COURT  
ABUJA  
15/09/22



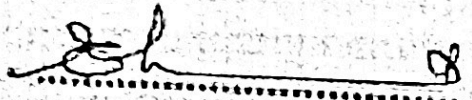
**UPON READING** the affidavit in support of the application deposed to by one Chief Victor Rumson Baribote, Christian, Nigerian citizen, Legal Practitioner in the Chamber of Celsus Ukpung & Co. of Block 12, flat 9 Shendam Close, off Emeka Anyaoku Street, Area 11, Garki Abuja and filed at the Registry of this Court.


**AND AFTER HEARING** Celsus Ukpung, Esq., (with Baribote, Esq.) of Counsel for the Claimants/Applicants inform the Court that the Defendants are taking action that will adversely affect the subject matter of this case.

**IT IS HEREBY ORDERED AS FOLLOWS:**

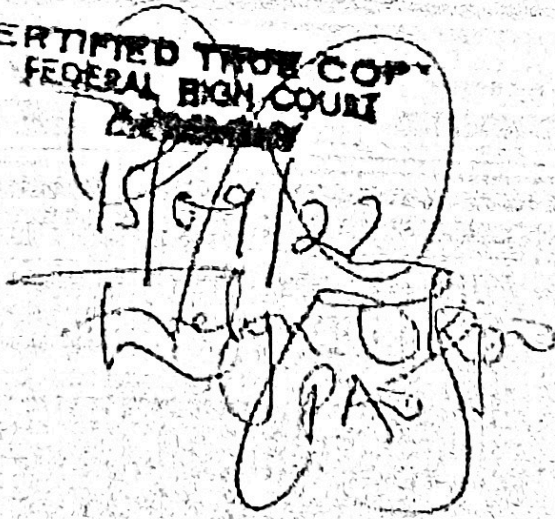
1. Parties are hereby ordered to maintain *status quo ante* pending final order of this Court.
2. Case reverts to 31<sup>st</sup> October, 2022 for hearing.

**ISSUED AT ABUJA** under the Hand of the Presiding Judge, Hon. Justice I. E. Ekwo, and the seal of the Court this 15<sup>th</sup> day of September, 2022.

  
.....  
Hon. Justice I. E. Ekwo  
Judge

  
.....  
Chioma Chijioke (Mrs.)  
Registrar

CERTIFIED TRUE COPY  
FEDERAL HIGH COURT  
ABUJA

15/09/22  


FEDERAL HIGH COURT ABUJA  
Commissioner For Oath  
Sign \_\_\_\_\_ Date 28/9/2022

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

APPEAL NO: \_\_\_\_\_  
SUIT NO: FHC/ ABJ/ CS/ 1376/ 2021

**BETWEEN:**

**NIGERIA FOOTBALL ASSOCIATION**  
(Trading under the name and style of the  
Nigeria Football Federation (NFF))

}

**APPELLANT**

**AND**

1. **HARRISON JALLA**
2. **CHIEF VICTOR RUMSON BARIBOTE**
3. **AUSTIN POPO**
4. **NATIONAL ASSOCIATION OF NIGERIAN**
5. **FOOTBALLERS (NANF)**  
(Trading in the name and style of the Professional  
Football Association of Nigeria (PFAN))
6. **AMAJU PINNIK**
7. **HON. MINISTER FOR SPORT AND YOUTH  
DEVELOPMENT**

}

**RESPONDENTS**

**NOTICE OF APPEAL**

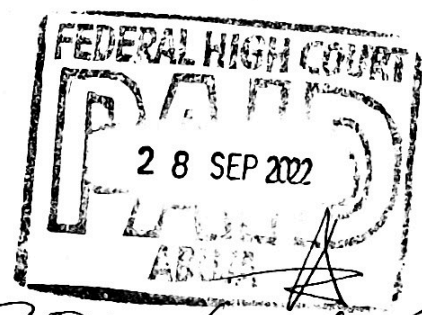
Take Notice that the Appellant being dissatisfied with the decision of the Federal High Court, Abuja, contained in the ruling delivered by Honorable Justice I.E. Ekwo on the 15<sup>th</sup> day of September, 2022, doth hereby appeal to the Court of Appeal upon the grounds set at in paragraph 3 hereunder, and will at the hearing of the Appeal seek the reliefs set out in paragraph 4.

Take Further Notice that the names and address of the persons directly affected by the appeal are those set at in paragraph 5 hereunder.

**PART OF THE DECISION OF THE LOWER COURT COMPLAINED OF:**

The whole decision.

**3. GROUNDS OF APPEAL**



350716076369

### **GROUND ONE (1):**

The learned trial lower Court erred in law which occasioned a miscarriage of justice when his lordship held thus: "*Parties are hereby ordered to maintain status quo ante pending the final order of this Court.*"

#### **PARTICULAR OF ERROR:**

1. There was no prayer before the lower Court asking for maintaining of the *status quo ante*.
2. It is trite principle of law that a Court can only grant what was prayed for.
3. The lower Court lacked the jurisdiction to grant an order not prayed for.

### **GROUND TWO (2):**

The learned trial lower Court erred in law which occasioned a miscarriage of justice when, after making the ex-parte order, it further held thus: "*Case reverts to 31<sup>st</sup> October, 2022 for hearing.*"

#### **PARTICULARS OF ERROR**

1. The ex-parte order was made on the 15/09/2022.
2. By the provisions of the Federal High Court Rules and the settled state of the law, an order made ex-parte shall not last for more than 14 days.
3. By granting the injunctive order and adjourning the matter to 31/10/2022, the trial Court tacitly made the ex-parte order to last from 15/09/2022 till 31/10/2022, which is for a period of 46 days.
4. There was no legal justification for the extension of the order till 31/10/2022.
5. The extension of the order to 31/10/2022 is against the interest of justice and will also prejudice / defeat the course of justice in this suit.

### **GROUND THREE (3):**

The learned trial lower Court misdirected itself which occasioned grave miscarriage of justice when it ordered the parties to maintain the status quo ante pending the final order of the Honourable Court and adjourned the suit to 31/10/2022.

## PARTICULARS OF ERROR

1. In the case of **Umejuru & Ors v. Imordi & Ors (2009) LPELR-8744 (CA)**, the Court of Appeal simply defined the term "*status quo ante*" as "... the position of the parties to the action immediately before or at the commencement of the action."
2. The *status quo ante* as at the 05/11/2021 when the writ of summons which initiated the instant suit was filed, was that, the 6<sup>th</sup> Respondent and others were the duly elected Executives of the Appellant whose statutory tenure was and is still running and is due to expire, lapse and come to an end on the 30/09/2022.
3. The learned trial Court, by ordering the maintenance of the *status quo ante* and by adjourning the suit to the 31/10/2022 *suo motu*, has indirectly extended the statutory period / tenure of the 6<sup>th</sup> Respondent and his Executives from 30/09/2022 when same is due to expire / elapse, to an uncertain / indefinite period without any legal justification.
4. The order of the learned trial Court has adversely affects, and prejudices the fundamental rights to freedom of association of the Appellant.

### 5. RELIEFS SOUGHT

- a. A DECLARATION that the interim order of 15/09/2022 was made without jurisdiction.
- b. AN ORDER setting aside the interim order of 15/ 09/2022.

### 6. PERSONS DIRECTLY AFFECTED BY THE APPEAL

NAME	ADDRESS
1. <b>NIGERIA FOOTBALL ASSOCIATION</b> (Trading under the name and style of the Nigeria Football Federation (NFF)) <b>(APPELLANT)</b>	New Federal Secretariat Complex, Maitema District, Abuja.Garki
2. <b>HARRISON JALLA</b>	<b>C/O:</b>
3. <b>CHIEF VICTOR RUMSON BARIBOTE</b>	Dr. Celsus Ukpog
4. <b>AUSTIN POPO</b>	F.F. Ibritam & Associates
5. <b>NATIONAL ASSOCIATION OF NIGERIAN</b>	Block 12 Flat 9 Shendam
6. <b>FOOTBALLERS (NANF)</b> (Trading in the name and style of the Professional Football Association of Nigeria (PFAN))	Close, off Emeka Anyaoku Street, Area 11, Garki, Abuja.



(RESPONDENTS)

7. AMAJU PINNIK  
(RESPONDENT)

NFF Building, Plot 2033  
Olusegun Obasanjo Way  
Zone 7, Abuja

8. HON. MINISTER FOR SPORT AND YOUTH  
DEVELOPMENT  
(RESPONDENT)

Federal Ministry of Youths  
and Sports Development  
FCT, Port Harcourt.

Dated this 27<sup>th</sup> day of September, 2022.



Plot 3 DSC Expressway /  
Opp. Eketé Inland Junction

Patrick Mekako Esq.  
Taruayen Oke-Oghene Sonia  
APPELLANT'S COUNSEL  
Patrick Mekako & Associates  
Markvia Plaza  
Plot 3 DSC Expressway  
Opp. Eketé Inland Junction  
Udu L.G.A, Bayelsa State.  
08068463390;  
[Mekakop777@gmail.com](mailto:Mekakop777@gmail.com)

Whose address for service within  
Abuja Jurisdiction is:

C/O:

Desmond C. Adams Esq.  
No. 3 All Saints Way  
Bwari, Abuja.  
08169345861.

**For Service On:**

The 1<sup>st</sup> -5<sup>th</sup> Respondents:

C/O: their counsel

Dr. Celsus Ukpong

F.F. Ibritam & Associates

Block 12 Flat 9 Shendam Close,

Off Emeka Anyaoku

Street, Area 11, Garki, Abuja.

**6<sup>th</sup> Respondent**

AMAJU PINNIK

Olusegun Obasanjo Way

Zone 7, Abuja

**7<sup>th</sup> Respondent**

Federal Ministry of Youths

And Sports Development

FCT, Port Harcourt.