

**Paper on Court of Appeal: Challenges & The Way Forward Presented  
by Chief Folake Solanke SAN, CON  
at the Annual Retreat/Conference of the Court of Appeal at the  
Continental Hotel, Lagos on Monday the 7<sup>th</sup> day of December, 2020**

**Protocol**

I salute the Hon. Justice Monica Dongban-Mensem — the President of the Court of Appeal, the Justices and Respected Guests. I am grateful for the cordial reception accorded me on my arrival. I wish the Court of Appeal a resoundingly successful Retreat/Conference. “Deo Volente”. I am delighted to be here.

**Part I**

**Introduction**

My presentation is in two Parts: Challenges (I) and The Way Forward (II).

I want to start with a plea “id est”: The President of the Court of Appeal — the Hon. Justice Monica Dongban-Mensem — gave me the title of my address namely: “Court of Appeal: Challenges and the Way Forward”. Challenges are problems requiring solutions. I am not here to abuse or embarrass or condemn any member of the judiciary. However, it is not possible for me to articulate the topic without dealing with some sensitive issues. I cannot play the ostrich, but must deal with our present reality and speak truth to judicial power. I ask you to accept my statements in good faith. I offer my recommendations “bona fide” because I share your concerns. Those who know me can testify even on oath that I have the greatest respect for the Judiciary. We are here to deliberate on how to restore the golden age of our judicial system and the administration of justice in our beloved country.

**THE CHALLENGES**

**Appointment of a Justice of the Court of Appeal**

Once more, I extend copious congratulations to the President for the elevation to the lofty position of President of the Court of Appeal, and offer prayers for an outstanding tenure. I wish the President divine empowerment, excellent health and stamina.

I also appreciate the invitation extended to me by the President to present a Paper at this important and strategic Retreat/Conference. I recall with a measure of nostalgia the President’s tenure as the Presiding Justice of the Ibadan Division of the Court of Appeal some years ago. The President’s performance was memorable and impressive.

As we all know, the Court of Appeal is a creature of the 1999 Constitution of the Federal Republic of Nigeria (as amended) in section 237(1) thereof. And S. 237(3) provides thus:

“A person shall not be qualified to hold the office of a Justice of the Court of

Appeal unless he is qualified to practise as a legal practitioner in Nigeria and has been so qualified for a period of not less than twelve years.”

There is also the Court of Appeal Act (1976 No. 43). It is noted that the “general” provisions in the Act do not contain any reference to the expected quality of the performance of a Justice in relation to ethics, integrity, legal scholarship and erudition. There is also nothing in the Act with which to assess a candidate’s computer literacy and proficiency. Although the Constitution is not expected to contain such details, sadly, the Court of Appeal Act is also silent on these crucial prerequisites for the appointment of an honest and competent Justice of the Court of Appeal in addition to what is provided in the Code of Conduct for Judicial Officers. Rule 10 of the code stipulates:

“Prohibition of and acceptance of gifts, bequests, loan, favour, benefit, advantage, bribe “et cetera”. Tragically the recent Corruption Index lists the Nigerian Judiciary number 1 followed by Banks”.

A monumental challenge.

### **Underfunding for the Court of Appeal**

Section 81(3) of the 1999 Constitution of the Federal Republic of Nigeria (as amended) provides thus:

Any amount standing to the credit of the Judiciary in the Consolidated Revenue Fund of the Federation **shall** be paid directly to the National Judicial Council for disbursement to the heads of the Courts established for the Federation and States under S. 6 of this Constitution.

The words of the Constitution are so plain that no ambiguity can be attached to them. Thus, it is therefore incomprehensible why the amount is not paid directly to the NJC as mandated by the Constitution, as the word “shall” implies.

Recently, President Muhammadu Buhari signed an Executive Order 10 in an effort to ensure that the provision for direct payment to the NJC is obeyed. However, most regrettably, up-to-date, politics and politicians have rendered Order 10 impotent.

As we know, there is perpetual public lamentation about the insufficiency of budgetary appropriation for the Judiciary. I fail to understand why the budgetary Appropriation for the Judiciary has remained ₦110 billion for the past two consecutive years and year 2021. It is a known fact that there were many appointments of Judicial Officers to the Court of Appeal a few years ago, and eight Supreme Court Justices were appointed recently. Yet, the amount has remained static. Without adequate funding of the Judiciary, the independence of the Judiciary is compromised. A government which starves the Judiciary of funds is not promoting the rule of law.

Consequently, in the context of insufficient funding, I extend high commendation to

the President for choosing a local venue for the Retreat/Conference, thereby saving millions of Naira which can be applied to other urgent needs. Well done President Monica. I am not aware of any foreign country coming to Nigeria to hold a Retreat or Conference — judicial or otherwise.

### **Federal Character**

The provision in Section 14(3) of the Constitution on federal character continues to inflict a lot of damage on the polity because merit and excellence have been sacrificed on the altar of mediocrity and incompetence. The damaging section provides:

“The composition of the Government of the Federation or any of its agencies and the conduct of its affairs shall be carried out in such a manner as to reflect the federal character of Nigeria and to promote national unity . . .”

Most regrettably, the undesirable effect of federal character is three fold:

- it has sacrificed merit and excellence on the altar of mediocrity and incompetence
- has exacerbated ethnic, tribal and regional contentions and rivalries
- has failed to promote national unity.

It is deplorable that people now focus on how many appointments are due to their area, not who is the best candidate to be appointed on merit to a particular position, including a judicial position. The distressing consequence is, with all due respect, that some judicial officers perform below expectation. As long as appointments are based on federal character, and not on merit, the quality of judgements will continue to plummet to the impairment of the Judiciary.

### **Court-Room Hearing**

We must realize that even litigants can form an opinion whether or not the Judicial officers demonstrate legal knowledge in the handling of an appeal. If they do not, in such a situation, the judgement of that particular court will not inspire confidence in anyone. Hearing of an appeal in the court-room is a serious business for the Justices, the counsel, the litigants and members of the public. There are instances when it is plain to a keen observer in the court-room whether or not a Justice had read the files and was prepared for the hearing of the appeal. Being unprepared, is as bad as being unlearned. A lot of discontent and disenchantment of the populace is caused when the Justices appear unprepared for the hearing of appeals.

Indeed, there was a time when it was exciting for the Bench and the Bar to engage in legal banter over the law during the hearing of a matter, when both the Justices and the counsel were ready to prosecute the case — to the enjoyment of the audience. Such banter can only happen when both the Justices and the counsel are ready, and on top of their expertise.

## **Personnel of the Court**

There are now twenty (20) Divisions of the Court of Appeal with the recent creation of the new four Divisions in Gombe, Kano, Asaba and Awka. Consequently, some staff have been deployed from some Divisions to man the Registries of the new Divisions. This situation has created some insufficiency in staff requirement which the Justices need to facilitate their burdensome judicial work.

## **No Research Assistants**

Generally, there are no research assistants provided for the Justices. I know some judicial officers who engage and pay research officers out of their own salaries. The provision for salaries and allowances in the Court of Appeal Act does not include salaries for Research Assistants.

## **Inconsistencies in Opinions of Panels and Divisions of the Court**

Another serious challenge is the inconsistency in the opinions of different panels and different Divisions of the Court of Appeal on similar facts and applicable laws. This is an extremely serious problem because such inconsistencies pose a huge dilemma for the Federal High Court and the State High Court as to which of the different opinions to follow on the principle of “stare decedendi”.

## **The Cancer of Corruption**

Now, it boggles the mind and tortures the soul that corruption in our justice delivery system is now the talk of town everywhere and anytime. Thus, there is a massive erosion of the trust and confidence which the people should have in our administration of justice. Indeed, when I jubilantly entered the profession in 1963, there was neither a whisper nor a rumour of corruption even in the Magistracy. However, and tragically, in the last few decades, the hydra-headed monster has gradually crept into the legal system to the point that the entire judiciary is now erroneously being tainted, painted and polluted with the dirt of corruption. In my 57 years at the Bar, with 39 of them as the first female Senior Advocate of Nigeria, I have never been so distraught about the corruption label which has been wrongly plastered on some of us — innocent members. That is the calamity which the corrupt ones among us have inflicted on our one and only legal profession. This is an unmitigated disaster for the legal profession and the country.

I now enter a Caveat — as I always do in all my public speeches — namely: that there are judges who abide by their oath of office and labour day and night to abide by their oath of office, and render judgements based only on the facts presented and the applicable laws,

without any extraneous consideration whatsoever. I applaud them. Most unfortunately, however, the members of the public think otherwise.

The contempt which the people now have for our judicial system has been publicly manifested when a fellow, wearing a Judge's robe and wig, a pair of slippers with a machete in his right hand, and a file under his left armpit, was walking on the street in the broad light of day in Lagos, and no one could challenge him — not even a citizen's arrest was attempted.

In addition to that wanton debasement and desecration of our judicial system, the court rooms, including the Lagos Igboere High Court — the magnificent edifice where the English legal system first took root, was burnt down with the furniture, books, documents, files, historical records “et cetera”. So were the Court of Appeal buildings in Lagos and elsewhere. That was the day of infamy for our legal system “id est”: the 21<sup>st</sup> day of October 2020. In my anguish, I sent a text of commiseration to the President of the Court of Appeal, the Lagos Chief Judge — Hon. Justice Kazeem Alogba and the Lagos State Judiciary through the Hon. Justice Jumoke Pedro whose email I had. I also spoke on the telephone to the Hon. Justice Gabriel Kolawole JCA, whose telephone number I have. Words fail me to describe my intense sorrow for the bedlam inflicted on the law. These egregious acts of mayhem perpetrated on the courtrooms are heart-breaking and soul-destroying.

However, let us remember that people do not destroy what they value and respect.

This is currently the lamentable state of our judicial hierarchy, of which, the Court of Appeal is a prominent part.

### **Section 398(7) of the Administration of Justice Act 2015**

This section provides that a Judge in the High Court who is elevated to the Court of Appeal could come back and conclude a part-heard case. In the Uzor Kalu case,<sup>1</sup> the Supreme Court knocked down that provision on the ground that the fiat /permission of the Court of Appeal granted by the immediate past President of the Court of Appeal — the Hon. Justice Zainab Adamu Bulkachuma — to allow the appellate Justice to return to the Federal High Court to conclude a case was “issued without any lawful or constitutional authority”. That was after the criminal case had been tried for about thirteen (13) years, and the appellant himself had applied for the fiat/permission for the Justice to return to conclude the criminal case involving billions of naira.

I say no more on the matter except that the necessary constitutional amendment is required. The Administration of Criminal Justice Act 2015 is a very reformatory legislation and abandonment of part-heard matters is one of the unacceptable causes of inordinate delays when part-heard cases are to be heard “de novo” as in the “Kalu” appeal. A Justice elevated

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<sup>1</sup> Ude Jones Udeogu v. 1. Federal Republic of Nigeria, 2. Orji Uzor Kalu and 3. Slok Nigeria Limited.

to the Court of Appeal should conclude his cases in the High Court before being sworn in the Court of Appeal.

### **Appeals from the Decisions of the Election Tribunals**

It is most dangerous that politics has also been a source of temptation for some judicial officers. The Court of Appeal hears appeals against decisions of electoral tribunals. Apart from the exposure of the Justices to the pollution of politics, the appellate Judges are also removed from their Divisions to go and preside over electoral appeals. Their absence caused by these appeals and other assignments exacerbate the congestion in the Court and prolong the inordinate delays for hearing appeals in the Court docket.

### **Inadequacy of Security**

The level of security for the Justices appears to be minimal. The court buildings and court rooms do not have sufficient cover, which situation is dangerous because the Justices perform a sensitive job. Every judgement has a winner and a loser, so there are potential enemies galore for Justices. May God protect all of us from our enemies as we discharge our professional responsibilities. “Deo Volente”. The gatemen are often left to protect the court premises.

## **Part II**

### **THE WAY FORWARD**

#### **Qualification for Appointment as a Justice of the Court of Appeal**

The most critical stage for the good performance of the Court of Appeal relates to the process of appointment of the appellate Justices. The 12-year qualification for eligibility for appointment is merely to satisfy the constitutional provision as a basic qualification for the elevated position. It is postulated that this requirement is insufficient to ensure that the person is fit for the lofty appointment of the Justice of the Court of Appeal. There must be other ways for the National Judicial Council to assess the character, legal knowledge, experience, integrity and ethical disposition of every candidate being considered for judicial office. Such an investigation is crucial, particularly now that the legal profession is in a dire state of disenchantment with the populace. Appointments must be on merit, not on federal character or on zone or quota consideration.

A candidate for judicial office without a computer competence is disqualified for appointment. It is recommended that serving Justices who are not computer literate should be given a period of time — perhaps three months, to undertake a computer literacy course. If a Justice, after the course of study, is still unable to grasp the rudimentary concepts of

computer knowledge which is now a “sine qua non” for the effective judicial performance, the Judex should retire with full benefits.

In this context, there is no gainsaying it that Information Technology (IT) has overtaken all human endeavours. Thus, it is recommended that the Court of Appeal must tackle this challenge with vigour and determination. Experts in the field of IT should be engaged to equip the court-rooms with IT devices and conduct training sessions for judicial officers. Knowledge is cumulative and we all learn every day otherwise, the brain will vegetate. It is canvassed that members of the Judiciary should, at least, be conversant with the rudiments of IT to enable them access information easily. IT has come to stay, it is the new reality of our times — I hope for better, and not for worse.

The legal profession has gone global. The Law School should prepare students for global practice and to become lawyers without borders. However, it is important to note that we should not only seek information on “google”, we should also apply our own minds and brains to resolve legal problems. As an aside, in my lectures, I always warn law students not to rely on the “cut and paste” methodology, but also to use their own brains.

### **War Against Corruption**

It is imperative that the candidate for judicial office must be honest, and like Caesar’s wife, be totally without blemish because corruption destroys the very fabric of the legal system of any country. Corruption and the legal systems are mortal enemies. The law cannot survive to perform its regulatory role in the society, if it is being administered by a corrupt judiciary. Anyone, including a Justice, must be punished for his or her crime. No one should commit a crime and get away with impunity. And the public should know that an erring Justice has been punished. Rule 10 of the Code of Conduct for judicial officers must be strictly obeyed.

### **Availability of Recording Devices**

The long hand-writing of physical court recording by the Justices is archaic, and should be abandoned and replaced with recording devices to facilitate the court proceedings, and enable the Justices to concentrate on the proceedings without the distraction of hand-writing the evidence and proceedings. Government must upgrade budgetary Appropriation for the Judiciary. A static ₦110 billion for three consecutive years including 2021 is deficient and incomprehensible. Supplementary Appropriation Bill should be presented based on the COVID-19 pestilence and the conflagration which consumed court buildings including the Court of Appeal.

### **Appointment of Competent Research Assistants**

Further, the Justices should be assisted by competent research assistants in the preparation of judgements. They should not have to employ and pay their research assistants. There should be provision in the Court of Appeal Act for them.

### **Congenial Court Room Environment and Facilities**

Court rooms should reflect the aura, dignity and majesty of the law. The Justices should be comfortable in a court-room to adjudicate on cases before them. The court room must always inspire the Bench, the Bar and the litigants to believe in the efficacy of the judicial system. The courtroom must reflect the nobility of the judicial system.

### **Adequate Security**

The issue of security is a matter which must now engage the urgent and serious attention of the Authorities having regard to the day of infamy — 21 October 2020 — when court buildings came under deadly assault. Security of court premises must be adequate. It is not enough to expect gatemen to be responsible for the security of the court premises. On the day that disaster struck, the gatemen ran away for dear life. No one can blame them for disappearing.

### **Avoidance of Inconsistencies in Judgements**

The Court of Appeal has to tackle the disturbing question of inconsistencies in judgements of panels and Divisions. I congratulate the Court on the Court of Appeal Reports (C.A.R) which are available in electronic and hard copy. I recommend that consideration be given to using the Reports to help in reducing the frequency of inconsistencies. When Justices read the Reports, that exercise ought to bring to their attention the previous opinions of their brother Justices.

Seminars and workshops on the Reports should be designed to deal with the problem of judicial inconsistencies in judicial opinions of the same court. Now, that we have twenty (20) Divisions of the Court of Appeal, the serious problem of inconsistencies and distortions may increase. The Court of Appeal owes it to the High Court to deal with this judicial problem.

### **Case Management**

It is important, having regard to the volume of work in the Court docket to embark on case management training. Case management will involve both the Justices and the Registries for better performance of the Court. I recommend that case management training programmes should be conducted for newly appointed Justices of the Court of Appeal and the Registries.



## **Electoral Tribunals**

In the Sixth Schedule of the Constitution on Election Tribunals, section A(3) on the National Assembly Election Tribunal provides:

“The Chairman and other members shall be appointed by the President of the Court of Appeal in consultation with the Chief Judge of the State, the Grand Kadi of the Sharia Court of Appeal of the State or the President of the Customary Court of Appeal of the State as the case may be”.

My postulation is that the President of the Court of Appeal should be relieved of this political burden. The President has more than enough to cope with in administering twenty Divisions of the Court of Appeal all over the country.

The Court of Appeal ought not to be involved in electoral matters. Stories of corruption in electoral litigations are too rampant and damning. The country must rescue the Justices from political pollution. A special legal system should be created for election litigations without involving the regular courts including the Supreme Court. Of course, these recommendations will need constitutional amendments.

Electoral appeals used to end in the Court of Appeal, but that ended years ago when electoral appeals were allowed to the Supreme Court. The allegations of corruption are so overwhelming that I vehemently plead that both the Court of Appeal and the Supreme Court should be totally insulated from the scourge of allegations of corruption which is destroying our legal system.

## **Adequate Personnel of the Registry**

It is canvassed that before new Justices and new Divisions are appointed, adequate court rooms, Justices chambers and Registry facilities are provided for the effective dispensation of Justice. Sufficient staff should be available to assist the Justices to perform their onerous judicial functions.

Further, there are also many complaints of corruption against Court Registries. Thus, adequate supervision of Registries is required to ensure that court processes are properly managed by the Registry without corrupt practices which may tarnish the reputation of an innocent Justice of the Court of Appeal.

## **Adequate Infrastructure**

The judicial work is so taxing and demanding that government should continue to ensure that adequate infrastructure by way of accommodation, office facilities, staff personnel, court-room furniture and facilities and well stocked libraries are available for the Justices to enable them perform to the optimum. Both the Justices and the counsel in an appeal must be comfortable in the performance of their different roles.

## **Part I - General Provisions of the Court of Appeal Act**

Salaries and allowances of the President and Justices of the Court of Appeal are listed in the Act. Certainly this is important. However, because of the current scandal of corruption, I recommend that “Ethics and Integrity” be included in the Act.

### **Avoidance of Technicalities**

The Court of Appeal ought to aim at attaining real justice, and should not allow technicalities to defeat the cause of justice. The balance between justice and technicality must weight in favour of justice. In the case of *Maersk Line v Addida Investment Ltd*, the Supreme Court per the then Chief Justice of Nigeria — the Hon. Justice Miriam Aloma Muhktar held as follows:

“The judicial process malfunctions and is discredited when it is bogged down in technicalities and is manipulated to go down from technicality to technicalities. This is why at all times, the tendency towards technicality should be eschewed and the determination to do substantial justice should remain the preferred option and hallmark of our judicial system.”<sup>2</sup>

In the *Niger Delta Development Council (NDDC) v Precision Association Ltd*, the Court of Appeal splendidly followed the lead of the Supreme Court in its determination to achieve substantial justice by holding that:

“The Appellant cannot cling tenaciously to technicalities and insist that the respondent’s case be dismissed or struck out. The hey days of technicalities are now gone for good. The court is now interested in doing substantial justice. Reliance on technicalities leads to injustice.”<sup>3</sup>

I rest my case on technicalities on those two categorical judicial pronouncements.

### **Principle of “stare decedendi”**

The principle of “stare decedendi” is crucial in achieving certainty of the law. By following precedents, judicial officers ensure the efficacy of the law and the reliability and credibility of the judicial system. Of course, no one is infallible, and consequently, no institution administered by human beings can be perfect. Thus, there will be occasions when the Court of Appeal has to reverse itself for sound reasons, as was done recently. It will amount to judicial ineptitude if a mistake of the past is detected and not remedied for the reliability of the law. However, such reversals must be extremely rare in order to preserve the rule of law and the principle of judicial precedents.

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<sup>2</sup> (2006) 13 NWLR (Pt 997, 401, 414-15)

<sup>3</sup> (2006) 16 NWLR (Pt 100, 527, 559-60)

In view of the unprecedented tragedy which befell the administration of justice on the October 21, 2020 day of infamy, with all due respect, I urge all of us to engage in self-examination, self-introspection and self-questioning in order to correct some of the mistakes and misdeeds of the past. However, no matter how agonizing the present situation is, we must not give up. We must remain resolute in our resolve to heal the wounds of the past. Let us be encouraged by the words of St. Paul the Apostle in 2 Corinthians 4: 8-9 as follows:

8 We are troubled on every side, yet not distressed; we are perplexed, but not in despair;

9 Persecuted, but not forsaken; cast down, but not destroyed.

I pray that God will empower us to overcome our present tribulations. Amen

I now seize this opportunity to acknowledge and applaud the Court of Appeal for what it has achieved since its creation in the midst of all the calamities which now assail the country, particularly the assault on fundamental human rights. For example, it was the Court of Appeal which ruled that citizens have the fundamental and constitutional right to hold peaceful protests and demonstrations without obtaining police permission.

### **“Obiter Dictum”**

It is a pity that “obiter dictum” is now missing in judgements. The state of the nation is so lamentable that there should be more “obiter dicta” in the judgements of the Court of Appeal and the Supreme Court. Law is for social engineering, and when it is necessary to correct a social evil, an “obiter dictum” should help the society to attend to the social problem. It is our professional duty to speak up for the people against the egregious atrocities committed on the people by the authorities and the powerful. In that context, I rely on the profound Biblical words in Proverbs 31: 9 as follows:

“Speak up and judge fairly, defend the rights of the poor and the needy.”

We should not “off the mic” or stage a fainting fit as was done recently in the Senate!

Thus, with all due respect, I urge you to speak up in your judgements in “obiter dicta”.

E soro soke! E soro soke!! E soro soke!!!

As I move to the end, I need to emphasize that the only way to end corruption is that everyone of us must eschew corruption and be corruption-free. When everyone in our cherished and prestigious profession is corruption-free, the entire profession will be corruption-free. We cannot profess the sanctity of the law in a corrupt judicial system — that would be an unmitigated contradiction. I plead that no member of the profession should betray all of us by being corrupt.

## **Appearance and Punctuality**

An impeccable appearance is a “sine qua non” for the Justices who should ensure that lawyers abide by the black and white attire for court. Female lawyers must avoid dangler earrings. The court is not a disco venue. At the Obafemi Awolowo University (OAU), in 1983, I refused to deliver a lecture because the students were late. Some of them later told me it was a lesson they never forgot. I had travelled to Ile-Ife from Ibadan, only to wait out for the students. I showed them my Lecture papers and walked out after. I told them that when I was a student in England, students waited for their lecturers. I ignored their pleas and we drove off.

Now, please allow me to offer to you the seven (7) social sins by Mahatma Gandhi — the legendary Indian statesman:

- Wealth without work;
- Pleasure without conscience;
- Science without humanity;
- Knowledge without character;
- Politics without principles;
- Commerce without morality;
- Worship without sacrifice.

## **Peroration**

In peroration, I respectfully commend to you another profound admonition of St. Paul the Apostle, to the brethren which appellation is appropriate for appellate Justices, as follows:

“Finally, brethren, whatsoever things are true, whatsoever things are honest, whatsoever things are just, whatsoever things are pure, whatsoever things are lovely, whatsoever things are of good report; if there be any virtue, and if there be any praise, think on these things.”

May God help us to heal Nigeria. “Deo Volente”.

I pause and thank you for your attention.

Dated this 7th day of December 2020

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**Questions & Answers Session After the Presentation**

There was a brief “Questions & Answers” session during which a few questions and comments were entertained concerning problems affecting the Judiciary.

One comment was on the salaries and allowances of the Judiciary which had remained stagnant since 2007. I was aghast that there had been no review of judicial salaries and allowances for thirteen solid years. That was an astonishing revelation for me. (That situation is totally unacceptable because the economic situation in the country and the world in 2020 is far different from that of 2007. Prices and costs of all things have soared).

Another complaint was about the night when armed personnel besieged, broke into judicial residences and carted away sacks of money, according to the media reports.

I told the audience that I wept when I read about the assault on judicial homes. I also assured them that I would report the stagnation of judicial salaries and allowances to Mr Olumide Akpata Esq — the President of the Nigeria Bar Association — for appropriate action.

Another issue which was raised was that of the creation of a Constitutional Court which was being proposed, sometime ago, to deal with all electoral litigations. I repeated my vehement postulation that the regular courts should have absolutely nothing to do with electoral litigations. A special court should be established for same.

However, I did recommend that, although the Judiciary cannot go on strike, yet they must not suffer in silence, but must evolve strategies to make their serious complaints known to the authorities for remedial action. I urge them to speak up, “id est”: E soro soke (Prov. 31: 9)

Dated this 7th day of December 2020

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