

**WRIT OF SUMMONS**

**IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY**  
**HOLDEN AT ABUJA**

CV/6833/2023

SUIT NO: FCT/HC/CVI /2023

CHIEF UMEH KALU, SAN

..... CLAIMANT

AND

1. PEOPLES DEMOCRATIC PARTY (PDP)

2. ABRAHAM AMAH

..... DEFENDANTS

TO:

PEOPLES DEMOCRATIC PARTY (PDP) AND ABRAHAM AMAH of 45  
Finbarrs Road, Umuahia, Abia State

You are hereby commanded that within THIRTY days after the service of this writ on you, inclusive of the day of such service, you do cause an appearance to be entered for you in an action at the suit of the above Claimant

And take notice that in default of your so doing, the Claimant may proceed therein and judgment may be given in your absence.

Take further notice that Parties shall maintain status quo.

DATED THIS 14<sup>th</sup> DAY OF July 2023

By order of the Court

HIGH COURT OF FCT ABUJA  
**REGISTRAR**  
HASSANA SADIQ  
Sign: [Signature] REGISTRAR  
14/7/23

*This writ is to be served within twelve calendar months from this date hereon or if renewed, within six calendar months from the date of the last renewal including the day of such date and not afterwards.*

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

Fee ₦4,700  
RN - 212933725  
Ddt 14/7/2023

The Claimant's claims are for-

1. **An Order** of this Honorable Court compelling the Defendants to publish an apology to the Claimant in a full page of Sun Newspaper and This Day Newspaper, retracting the defamatory statements contained in the Press Statement titled "*Umeh Kalu's Very Unprofessional Conduct and Interference in the Ongoing Abia Election Petition Tribunal*".
2. **An Order** of this Honorable Court compelling the Defendants, jointly and severally, to publish an apology to the Claimant on his Facebook Social Media Page/Website and also the Facebook Social Media Page/Website of the Abia State Chapter of the Peoples Democratic Party, retracting the defamatory statements contained in the Press Statement titled "*Umeh Kalu's Very Unprofessional Conduct and Interference in the Ongoing Abia Election Petition Tribunal*".
3. **An Order** of the Court compelling the Defendants, jointly and severally, to pay general damages of ₦500,000,000 (Five Hundred Million Naira) for the damage done to the reputation of the Claimant by the publication of the false, malicious and defamatory statements contained in the Press Statement titled "*Umeh Kalu's Very Unprofessional Conduct and Interference in the Ongoing Abia Election Petition Tribunal*".

This Writ was issued by the Adekunle Kosoko, whose address for service is Seasons Law Firm, 46 Claude Ake Street, Off First Avenue, Gwarinpa District, Abuja.

This Writ was served by me at .....  
on the Defendants on the ..... day of  
20.....

Endorsed on the ..... day of ..... 20.....

Signed:

Address:

**THIS WRIT OF SUMMONS IS TO BE SERVED OUT OF THE FEDERAL  
CAPITAL TERRITORY – ABUJA AND IN THE ABIA STATE**

**IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY  
HOLDEN AT ABUJA**

**SUIT NO: FCT/HC/CV/ /2023**

**CHIEF UMEH KALU, SAN**

**..... CLAIMANT**

**AND**

**1. PEOPLES DEMOCRATIC PARTY (PDP)**

**2. ABRAHAM AMAH**

**..... DEFENDANTS**

**STATEMENT OF CLAIM**

1. The Claimant is a Nigerian citizen, a dedicated family man, husband, father, grandfather, and, a highly respected member of the society.
2. The Claimant is a legal practitioner of almost Four (4) decades post – call experience, who has devoted almost his entire adult life in meritorious service to the legal profession, Abia State and indeed Nigeria; which service has led to his being bestowed with numerous awards and honourifics.
3. The Claimant through dint of hard work and unparalleled service to the legal profession has served as the Attorney – General & Commissioner for Justice in Abia State for ten (10) years; was conferred with the rank of Senior Advocate of Nigeria; appointed a Life Member of the Body of Benchers, and, currently serves as a member of the Ethics Committee of the Body of Benchers, and, sits on the panel of the Legal Practitioners Disciplinary Committee (LPDC).
4. The Claimant is a member of several professional, religious and socio – political bodies including the Nigerian Bar Association and the International Bar Association.

5. At all times relevant and material to the facts of this Suit, the 2<sup>nd</sup> Defendant was the Vice Chairman/Acting State Publicity Secretary of the Peoples Democratic Party (PDP) in Abia State.
6. Sometimes in June, 2023, the 2<sup>nd</sup> Defendant, acting in his capacity as the Vice Chairman / Acting Publicity Secretary of the 1<sup>st</sup> Defendant (PDP) in Abia State, issued a Press Release wherein he authored, uttered, published and caused to be published a Press Statement of and concerning the Claimant titled *“Umeh Kalu’s Very Unprofessional Conduct and Interference in the Ongoing Abia Election Petition Tribunal”*.
7. The Press Statement titled *“Umeh Kalu’s Very Unprofessional Conduct and Interference in the Ongoing Abia Election Petition Tribunal”* concerning the Claimant, which was authored, uttered, published and caused to be published by the Defendant contained the following words:

*“PRESS RELEASE*

*\*UMEH KALU’S VERY UNPROFESSIONAL CONDUCT AND INTERFERENCE IN THE ONGOING ABIA ELECTION PETITION TRIBUNAL\**

*The Abia PDP is aware that the Labour Party and its agents, especially Umeh Kalu, SAN, is making desperate efforts to subvert justice by interfering with the activities of the Abia Election Petition Tribunal following revelations at the Tribunal sitting yesterday that Umeh Kalu, a Learned Silk, disguised and impersonated as a Counsel to the first respondent, the Independent National Electoral Commission, INEC and collected processes for service on the Petitioner’s (PDP) Counsel and purportedly, howbeit, maliciously pretending to have served the Petitioner’s Counsel at his office in Aba.*

*We are neither surprised nor disappointed because it is a horrible and distasteful pattern of reckless behaviour that both the Labour Party and Umeh Kalu have patented in Abia politics in just a few months of their existence.*

*At every turn of event, Umeh Kalu has shown himself as an unrepentant misfit for the legal profession. We are rather worried that the Labour Party which prides itself as upright, saintly and*

*sanctimonious would nest with a character as cheaply as Umeh Kalu in these acts of impersonation and forgery.*

*When we raised concerns about his character a few weeks ago, we were not speaking out of malice against his persona, we were merely stating who he is and gratefully, he has not disappointed us by proving that we were right after all.*

*We advise Umeh Kalu to exercise restraint in his duplicity because his actions drag the prestige of the highly regarded legal profession to the mud any time he bungles his cheap mischief.*

*To the Abia NBA, we call on you to discipline one of your own because the acts of impersonation and forgery are serious infractions on our laws and we are already in discussions with the PDP lawyers to do the needful.*

*We call on the members of the PDP and the good people of Abia State to remain steadfast, calm, peaceful and trust in the ability of the judiciary to restore our mandate which was stolen on March 18, 2023.*

*\*PDP - Power to the People!\**

*Signed*

*\*Hon. Elder Abraham Amah\**

*\*Abia PDP Vice Chairman/Acting State Publicity Secretary\*\**

8. The words, statements, sarcasms and innuendos contained in the Defendants' said Press Statement in their natural and ordinary meaning meant and were intended and understood by those who read it, to allege that the Claimant is a reckless impersonator, mischief maker and document forger who is unfit to be a member of the legal profession.
9. The Defendants published the said article which contained the defamatory words through various media, allied Whatsapp platforms including on the Internet on the World Wide Web on the Facebook social media platform/website of one Nwaigwe John Sunday – [https://m.facebook.com/story.php?story\\_fbid=pfbid02h8VvjFuueqsHDSHDG3SZXJes6mVuovikL852oMUp6jLqUxozMsg9YhsvnvnPxX3l&id=100010908702699&sfnsn=scwspmo](https://m.facebook.com/story.php?story_fbid=pfbid02h8VvjFuueqsHDSHDG3SZXJes6mVuovikL852oMUp6jLqUxozMsg9YhsvnvnPxX3l&id=100010908702699&sfnsn=scwspmo) – with the intention that it should be accessed and read by members of the public, and, it was indeed seen and read by members of the public.

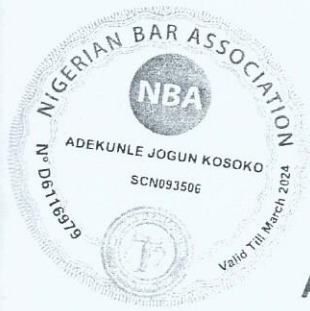
10. The published Press Statement containing the words reproduced above was read by millions of people globally, including friends, professional colleagues and other associates of the Claimant.
11. The Defendants proceeded to maliciously utter, publish and cause to be published the above reproduced defamatory statements which were untrue, with the intent to injure, and, destroy the reputation and social standing of the Claimant.
12. The false statements uttered, published and cause to be published by the Defendants impressed on the minds of right thinking members of the Nigerian and international community that the Claimant is a reckless impersonator, mischief maker and document forger who is unfit to be a member of the legal profession.
13. These false allegations made by the Defendants have ruined the reputation of the Claimant amongst his social peers, professional colleagues and international associates – a reputation which was nurtured over several decades.
14. These false allegations are recorded for eternity on the Internet, are sources of embarrassment and humiliation to the Claimant and constitute hindrance to formation of meaningful professional and economic partnerships, since all current and prospective partners have access to the information on the Internet, which informs them that the Claimant is bereft of good reputation – an allegation which is false and unflattering.
15. The Claimant has been hurt emotionally and materially, and, has been left in an uncertain position as to whether his proposals for professional partnership with various local and international organizations have been jeopardized by the untrue allegations published by the Defendants.
16. On June 16, 2023, the Claimant through his solicitors wrote to the 2<sup>nd</sup> Defendant and implored him to retract these false statements, pleaded for mitigation of the damage and cited the trauma, loss of reputation and financial loss occasioned by the publication made by the Defendants.
17. The Defendants have declined, refused, neglected and omitted to retract these false statements till date, further sustaining the damage already done to the reputation of the Claimant without any remorse.

18. The personal and professional reputation of the Claimant nurtured by almost Forty years' involvement in the legal profession has been sullied by the false statements made by the Defendants.
19. The refusal of the Defendants to retract these false statements has forced the Claimant to resort to legal representation and incur legal bills which financial loss could have been avoided.
20. That as a consequence of the said words uttered, written, published and/or caused to be published by the Defendants, the Claimant's reputation, character and standing has been severely injured, and, the Claimant has also been brought into public odium, ridicule, contempt and hatred by right thinking members of the society who now despise and avoid him.

**WHEREFORE THE CLAIMANT** claims against the Defendants jointly and severally as follows:

1. **An Order** of this Honorable Court compelling the Defendants to publish an apology to the Claimant in a full page of Sun Newspaper and This Day Newspaper, retracting the defamatory statements contained in the Press Statement titled "*Umeh Kalu's Very Unprofessional Conduct and Interference in the Ongoing Abia Election Petition Tribunal*".
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DATED THIS 14<sup>th</sup> DAY OF JULY 2023



ADEKUNLE KOSOKO, ESQ. ✓  
ARTHUR IFEANYICHUKWU ALAOMA, ESQ.  
CHIGOZIRIM OBIOMA, ESQ.

Counsel to the Claimant  
Seasons Law Firm  
46 Claude Ake Street,  
Off 1<sup>st</sup> Avenue, Gwarinpa District, Abuja  
kosokoadekunle@nigerianbar.ng  
08022748378, 08033085205

FOR SERVICE ON:

1. **THE DEFENDANTS**  
45 Finbarrs Road,  
Umuahia,  
Abia State