

IN THE FEDERAL HIGH COURT OF NIGERIA

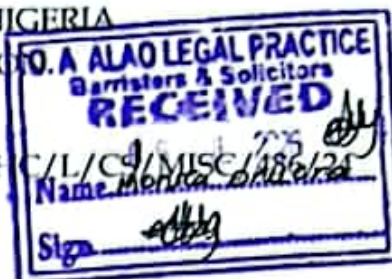
IN THE LAGOS JUDICIAL DIVISION

HOLDEN AT LAGOS

SUIT NO: FC/L/C/MISC/188/25

BETWEEN:

1. FIELDREAMS LIMITED
2. IFEANYI NWEKE
3. AMEX SAVINGS AND LOANS LIMITED



APPLICANTS

AND

1. THE CHAIRMAN, ECONOMIC AND FINANCIAL CRIMES COMMISSION (EFCC)
2. DR. KENNEDY OKONKWO
3. MR. DEMOLA OGUNFEYIMI
4. MRS. OMOYEMI OGUNFEYIMI
5. MR. OLUREMI ADEYINKA MORGAN
6. MRS. OLUYINKA ABIMBOLA MORGAN
7. MR. GBENGA ONABANJO
8. MR. BABATUNDE MONINUOLA
9. MR. ELIJAH A. AYANSINA
10. MR. EJIROGHENE OVIE EKWEVUGBE
11. MR. AZUKA EGBUNIKE
12. MRS. OGHENETEJIRI EGBUNIKE
13. MR. SEGUN ANIMASHAUN
14. MRS. FOLAKEMI AKINLEYE
15. MRS. EBUN MACGREGOR
16. MRS. AURELIA ESIRI
17. MR. OLADIPUPO MICHAEL MARTINS
18. MRS. OLAOLUWALAYOMI STEPHANIE MARTINS
19. GBOLAHAN ODUTAYO



RESPONDENTS

MOTION ON NOTICE

BROUGHT PURSUANT ORDER 32 OF THE FEDERAL HIGH COURT (CIVIL PROCEDURE) RULES 2019 AND UNDER THE INHERENT JURISDICTION OF THIS HONOURABLE COURT AS PRESERVED UNDER SECTION 6(6) (A-B) OF THE CONSTITUTION OF THE FEDERAL REPUBLIC OF NIGERIA 1999 (AS AMENDED)

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Applicants' Motion for Stay of Execution
VICTOR UKUTT & CO.
(Legal Practitioners)

SIMMONS COOPER PARTNERS

8th Floor, Fortune Towers
27/29, Adeyemo Alakija Street,
Victoria Island, Lagos.

Name: Gene Okeye
Sign: [Signature] Date: 16-07-26
Time: 1:13pm

TAKE NOTICE that this Honourable Court will be moved on _____ the _____ day of _____ 2026 at the hour of 9 0' clock in the forenoon or so soon thereafter as Counsel may be heard on behalf of Applicants praying this Honourable Court for the following reliefs: -

1. AN ORDER OF INJUNCTION of this Honourable Court unconditionally staying the execution and/or enforcement of the Order for Final Forfeiture of this Honourable Court in its Ruling delivered on 14th July, 2026, pending the determination of the appeal filed by the Applicants herein at the Court of Appeal, Lagos Judicial Division.

Or in the alternative:

2. AN ORDER OF INJUNCTION for the preservation of the subject matter and/or preservation of the *status quo* by the parties pending the determination by the Court of Appeal, Lagos Judicial Division of the Applicants' appeal against the Ruling of this Honourable Court delivered on 14th July, 2026 granting the Order for Final Forfeiture.
3. AN ORDER of this Honourable Court restraining the Respondents from acting upon or taking steps by themselves, their agents, privies and assigns to execute or enforce the Order for Final Forfeiture of this Honourable Court,
4. AND FOR SUCH FURTHER OR OTHER ORDER(S) as this Honourable Court may deem fit to make in the circumstances of this suit.

FURTHER TAKE NOTICE that the grounds upon which this application is brought are:

1. The Applicants have filed an appeal against the Ruling of this Honourable Court granting an Order for the Final Forfeiture of the Applicants' properties in this matter.
2. The appeal filed contained special and exceptional circumstances showing that the balance of convenience is in favour of the application.
3. Some of the points of law raised in the appeal touch on jurisdiction of this Honourable Court.
4. The effect of the Ruling appealed against being that it relates to the Final Forfeiture Order is so far reaching such that the instant appeal would be highly prejudiced unless this application is granted.

5. That the substance of the reliefs contained in the said Order for Final Forfeiture is that the Respondents will take over the units of apartment for their individual benefits and not to the Federal Government as provided by the provisions of the Advance Fees Fraud and Other Related Offences Act even when the status of the Respondents are hugely contested and forfeiting the entire units of apartment in the estate to the Respondents against the interest of other subscribers will amount to destroying the *res*.
6. That from the nature of this dispute, it is better and most convenient and in the best interest of justice to stay the execution/enforcement of the Final Forfeiture Order and to allow the Applicants especially the 2nd Applicant exhaust the constitutional right of appeal before any enforcement if such would be called for after the exhaustion of such rights of appeal.
7. It is necessary to grant this application in order to preserve the *res* or the subject matter of this dispute so as not to render the eventual outcome of the said appeal nugatory.
8. This Honourable Court has both the statutory and inherent powers to grant this application and is in the circumstance enjoined to grant same.

Dated this 15th day of July 2026.




Victor Ukutt, Esq.

Ibrahim C. Adamu, Esq.
(Counsel to the 1st - 3rd Applicants)
VICTOR UKUTT & CO.
No. 1, Tafawa Balewa Crescent
Off Adeniran Ogunsanya Street
Surulere - Lagos State
08037260751
kikoukutt@yahoo.com
kikoukutt@nba.ng



FOR SERVICE ON:

1. The 1st Respondent
The Chairman, Economic and Financial Crimes Commission (EFCC)
C/o Its Counsel
L.A. Tukur, Esq
Joy Amahian, Esq
Franklin Ofoma, Esq
7A Okotie-Eboh Road
Ikoyi
Lagos State
lamidotukur6@gmail.com
07069289186

2. The 2nd Respondent
C/o of his Counsel
Seun A. Alao Esq.
Segun B. Olarinde Esq.
Okwuchi R. Ozor Esq.
Kehinde Ebitanmi Esq.
Ito Ekanem Esq.
Chidi Silvanus Esq.
Ruth Osirike Esq.
Jasper Egede Esq.
O. A. Alao Legal Practice
Unit 1, Murray's Coalesce
Prince Olanrewaju Elegushi Street
Salem Bus Stop, Lekki
Lagos State
08035659223
oaalao@lawyer.com, info@oaalao.com

3. The 3rd - 18th Respondents
C/o their Counsel
Dapo Akinosun SAN
Bashiru A. Ramoni
Olayinka Alao
Judith Didigu
Esther Olawale
SIMMONSCOOPER PARTNERS

9th Floor, Fortune Towers
27/29, Adeyemo Alakija Street
Victoria Island
Lagos State
info@scp-law.com
07069577626

4. The 19th Respondent
C/o his Counsel
Yehoshua Odiase
Olaniwun Ajayi LP
The Adunola
Plot L2, 401 Close
Banana Island
Lagos State
08029305505
5. Deputy Sherriff
Federal High Court
Lagos Judicial Division
Ikoyi
Lagos State