

**IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA
ON TUESDAY, THE 27TH DAY OF JANUARY, 2026
BEFORE HIS LORDSHIP HONOURABLE JUSTICE M. G. UMAR
JUDGE
SUIT NO. FHC/ABJ/CS/1238/2025**

BETWEEN:

VICTOR OZIOMA NWADIKE

- PLAINTIFF

AND

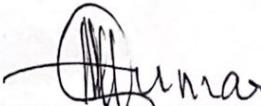
**1. NIGERIAN BAR ASSOCIATION (NBA)
2. GENERAL COUNCIL OF THE BAR
3. ATTORNEY-GENERAL OF THE
FEDERATION**

- DEFENDANTS

JUDGEMENT ORDER

UPON THE ORIGINATING SUMMONS dated and filed 25th June, 2025 praying this Court for the following Orders:

1. A Declaration that the Legal Practitioners Act, Cap L11, LFN 2004, is the principal legislation regulating a Legal Practitioner's right of audience in any Court in Nigeria.
2. A Declaration that the Legal Practitioners Act, Cap L11, LFN 2004, has made exhaustive provisions on the conditions for a Legal Practitioner's right of audience in any Court in Nigeria.
3. A Declaration that the Nigerian Bar Association and/or the General Council of the Bar lacks the statutory power to impose additional requirements not contained in Legal Practitioners Act, Cap L11, LFN 2004, for a Legal Practitioner's right of audience in any Court in Nigeria.


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Hon. Justice M. G. Umar

Judge
FEDERAL HIGH COURT
ABUJA

05 FEB 2026

PAID

JUDGEMENT ORDER IN VICTOR OZIOMA NWADIKE v. NIGERIA & ORS.

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SUIT NO: FHC/ABJ/CS/1238/2025

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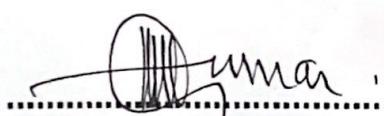
Hon. Justice M. G. Umar
Judge

4. An Order of mandatory injunction setting aside and nullifying the provisions of the Rules of Professional Conduct for Legal Practitioners, 2023, and Nigerian Bar Association Mandatory Continuing Professional Development Rules, 2025, in so far as they seek to add to, alter, or vary the conditions for a Legal Practitioner's right of audience in any Court in Nigeria as prescribed under the Legal Practitioners Act, Cap L11, LFN 2004.
5. An Order of mandatory injunction restraining the Respondents, whether by themselves, their agents, servants, or assigns, from enforcing or implementing any policy requiring Mandatory Continuing Professional Development as a condition for a Legal Practitioner's right of audience in any Court in Nigeria.
6. An Order of mandatory injunction directing the 1st Respondent to refund forthwith all monies paid by any legal practitioner in Nigeria to any of the 1st Respondent approved third parties providers in compliance and/or implementation of the policy requiring Mandatory Continuing Professional Development as a condition for a Legal Practitioner's right of audience in any Court in Nigeria.
7. Costs of this action.
8. Such further or other Orders as this Honourable Court may deem fit to make in the circumstances.

AND the Court having delivered its Judgement.

IT IS HEREBY ORDERED AS FOLLOWS:

1. A Declaration is hereby made that the Legal Practitioners Act, Cap L11, Laws of the



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Hon. Justice M. G. Umar
Judge

Federation of Nigeria 2004, is the principal legislation regulating a Legal Practitioner's right of audience in any Court in Nigeria.

2. A Declaration is hereby made that the Legal Practitioners Act, Cap L11, Laws of the Federation of Nigeria 2004, has made exhaustive provisions on the conditions for a Legal Practitioner's right of audience in any Court in Nigeria.
3. An Order is hereby made setting aside and nullifying the provisions of the Rules of Professional Conduct for Legal Practitioners, 2023, and the Nigerian Bar Association Mandatory Continuing Professional Development Rules, 2025, in so far as they seek to add to, alter, or vary the conditions for a Legal Practitioner's right of audience in any Court in Nigeria as prescribed under the Legal Practitioners Act, Cap L11, LFN 2004.
4. An Order is hereby made restraining the Defendant, whether by himself, Agents, Servants, Cohorts or Assigns, from enforcing or implementing any policy requiring Mandatory Continuing Professional Development as a condition for a Legal Practitioner's right of audience in any Court in Nigeria.
5. No Order as to cost.

ISSUED AT ABUJA, under the hand of the Presiding Judge, **Hon. Justice M. G. Umar**, and seal of the Court this 27th day of January, 2026.

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FEDERAL HIGH COURT
ABUJA

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HGD



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Daisy Esa (Miss)
Registrar