

FOR SERVICE

IN THE HIGH COURT OF FEDERAL CAPITAL TERRITORY
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO:

CN/230/26

IN THE MATTER OF AN APPLICATION FOR THE
INTERPRETATION AND ENFORCEMENT OF RIGHTS
ARISING FROM THE PENSION REFORM ACT, 2014

BETWEEN

1. DR. GREG UKEL ANGIATING
2. MR. GIFT UNIMKE ANGIATING
3. MISS PRISCA BIWOM ANGIATING - CLAIMANTS

*(Suing as the Administrator of the
Estate of late Ashib. Godwin Angiating)*

AND

1. PREMIUM PENSION LIMITED - DEFENDANTS
2. MRS. FELICIA ABIYE ANGIATING

ORIGINATING SUMMONS

BROUGHT PURSUANT TO SECTIONS 173, 210 OF THE
CONSTITUTION OF THE FEDERAL REPUBLIC OF
NIGERIA, 1999 (AS AMENDED)

SECTIONS 3, 4, 7(1)(A), 8, 11, 15, 22, 83, 84, 89 OF THE
PENSION REFORM ACT, 2014

ORDER 2 RULES 3(1-5) & ORDER 57 RULE 1(a) OF THE
HIGH COURT OF THE FCT (CIVIL PROCEDURE) RULES,
2025 AND UNDER THE INHERENT JURISDICTION OF
THIS HONOURABLE COURT

LET:

1. THE 1ST DEFENDANT
PREMIUM PENSION LTD,
NO. 4 AWGU CLOSE,



Fee 28800
032445805

**OFF FASKAARI CRESCENT,
AREA 3,
GARKI, ABUJA.**

2. THE 2ND DEFENDANT

**MRS. FELICIA ABIYE-ANGIATING
FEDERAL COLLEGE OF EDUCATION,
OBUDU,
CROSS-RIVER STATE.**

Within (30) thirty days after service of this Summons inclusive of the day of such service, cause an appearance to be entered for you to this summon which is issued upon the application of **the Claimants** for the determination of the following questions:

- i. *Whether upon the death of a Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, the Pension Fund Administrator, PREMIUM PENSION LIMITED, is legally bound to release the pension benefits to duly appointed Administrators of the Estate of Late Ashib Godwin Angiating upon presentation of Letters of Administration.*
- ii. *Whether the nomination of the 2nd Defendant by a deceased Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, overrides or excludes the Authority of Administrators appointed by competent High Court of Federal Capital Territory.*
- iii. *Whether the refusal of the 1st Defendant, PREMIUM PENSION LIMITED, to release the deceased's pension benefits to the Claimants despite valid Letters of Administration is unlawful, ultra vires, and contrary to the Pension Reform Act, 2014.*
- iv. *Whether the Claimants are entitled to an Order of this Honourable Court compelling the 1st Defendant to release the deceased's pension benefits forthwith to the Claimants.*

v. Whether the Claimants are entitled to monetary damages.

IN THE EVENT that the above questions are answered in favor of the Claimants, the Claimants pray this Honourable Court for the following reliefs to wit:

- a. **A DECLARATION** that upon the death of **Late Ashib Godwin Angiating**, his Retirement Savings Account with Pension Policy Identification Number is **100060918055** maintained with the 1st Defendant formed part of **Late Ashib Godwin Angiating's** Estate and became subject to administration by the 2nd and 3rd Claimants pursuant to the Letters of Administration granted by the High Court of the Federal Capital Territory.
- b. **A DECLARATION** that the purported Nomination of the 2nd Defendant by the deceased, **Late Ashib Godwin Angiating** as his Next of Kin in the 1st Defendant's database during his lifetime does not override, invalidate, or exclude the legal authority of the Claimants as Administrators of the Estate of **Late Ashib Godwin Angiating**.
- c. **A DECLARATION** that the 1st Defendant's refusal to release the pension benefits of the deceased, **Late Ashib Godwin Angiating** to the Claimants upon presentation of valid Letters of Administration is unlawful, wrongful, and contrary to the provisions of **Section 8(2) of the Pension Reform Act, 2014**.
- d. **AN ORDER** compelling the 1st Defendant to release and pay over forthwith to the Claimants, all pension benefits standing to the credit of **Late Ashib Godwin Angiating** Retirement Savings Account.
- e. **AN ORDER** directing the 1st Defendant to within 30 days of delivering this Judgment or such period as this Court may deem necessary, render a full account of all

contributions, accrued rights, interests, and returns in respect of **Late Ashib Godwin Angiating's** Retirement Savings Account.

- f. **GENERAL DAMAGES** in the sum of **₦500,000,000.00** (**Five Hundred Million Naira**) to the Claimants by the 1st Defendant for unlawful withholding of **Late Ashib Godwin Angiating's** Estate property.
- g. **COSTS** of this action.

Dated this 21 day of January, 2026.

By the Order of Court.

This summons was taken out by **IFEANYI M. NRIALIKE ESQ.**, whose address for service is **IKECHUKWU EZECHUKWU SAN & CO, No. 2 Tanga Street, Wuse, Zone 6, Abuja-FCT**, Legal Practitioner for the named Plaintiff.

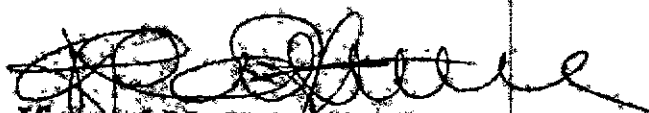
This Originating Summons is to be served on the 1st Defendant in Abuja-FCT of Nigeria.

AND on the 2nd Defendant in Obudu, Cross-River State, outside the jurisdiction of this Honourable Court.

TAKE NOTICE that parties are to maintain status quo until otherwise ordered by the Court.

The Defendants may appear hereunto by entering appearance personally or by a legal practitioner either by filing the appropriate processes in response at the registry of the Court where the summons was issued or by sending them to that office by any of the methods allowed by the Rules.

Note: If the Defendants do not respond within the time at the place above mentioned, such orders will be made and proceedings may be taken as the Judge may think fit or expedient.


Ifeanyi M. Nriafike Esq.
Ogechi P. Ogbenna Esq.
Collins Nnabuike Onah, Esq.
Kenechukwu H. Okolo Esq.
Christian C. Iheka Esq
Amarachi S. Ogbu Esq
Ikechukwu Ezechukwu, SAN & Co.
No. 2 Tanga Street,
Wuse, Zone 6,
Abuja.
08036051638

FOR SERVICE ON

1. THE 1st DEFENDANT

Premium Pension LTD,
No. 4 Awgu Close,
Off Faskaari Crescent,
Area 3,
Garki, Abuja.

2. THE 2ND DEFENDANT

MRS. FELICIA ABIYE ANGLATING
FEDERAL COLLEGE OF EDUCATION,
OBUDU,
CROSS-RIVER STATE.

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

SUIT NO: _____

BETWEEN

- 1. DR. GREG UKEL ANGIATING**
- 2. MR. GIFT UNIMKE ANGIATING**
- 3. MISS PRISCA BIWOM ANGIATING - CLAIMANTS**

*(Suing as the Administrator of the
Estate of late Ashib Godwin Angiating)*

AND

- 1. PREMIUM PENSION LIMITED - DEFENDANTS**
- 2. MRS. FELICIA ABIYE ANGIATING**



AFFIDAVIT IN SUPPORT OF ORIGINATING SUMMONS

I, MR. GIFT UNIMKE ANGIATING, Male, Adult, Christian, Citizen of Nigeria of Peace Court Estate, Lokogoma, Abuja do hereby make on Oath and state as follows: -

- 1: That I am the 2nd Claimant in this case and I am one of the Administrators of the Estate of **Late Mr. Angiating Ashibi Godwin**
2. The Claimants at all times material to this suit are children of **Late Ashib Godwin Angiating**, who died intestate on **4th December, 2021**.
3. The 1st Defendant is an Insurance Company with it's head office at **No.4 Awgu close off Faskaari crescent Area 3 Garki Abuja**, within the jurisdiction of this Honourable Court, wherein the Claimant's father maintained an insurance policy.
4. The 2nd Defendant is the person whom the 1st Defendant claimed that our father, **Late Ashib Godwin Angiating**, who

died intestate named in the 1st Defendant's database as his Next of Kin.

5. My father, **Late Mr. Angiating Ashibi Godwin** worked at Federal College of Education, Obudu, Cross -River State before his retirement.
6. That our Father **Late Mr. Angiating Ashibi Godwin** suffered cancer from **2016 to 2021** and unfortunately died on **4th December, 2021** and was buried on **28th December, 2021**.
7. That our Father **Late Mr. Angiating Ashibi Godwin** during his active time in Federal Civil Service, commenced the Registration of an insurance policy with the 1st Defendant and made contributions as required and his Pension Policy Identification Number is **100060918055**. *A copy of the letter from the 1st Defendant notifying our father of successful opening of his Retirement Savings Account dated 3rd August, 2022 is herein delivered as Exhibit A.*
8. That our Father **Late Mr. Angiating Ashibi Godwin** made series of contribution to the 1st Defendant that is yet to be paid back to me and the 1st and 3rd Claimants as Administrators of the Estate of our Late Father.
9. That our Late father has no other biological children outside the three (3) of us, the herein Claimants.
10. That our Late Father is lawfully married to our mother **Mrs. Christiana Angiating** and had three of us, claimants as their children.
11. That Federal college of Education Obudu Cross-River State as at the time of his death had only us, the Claimants as his biological children.
12. During the course of his active time in Federal Civil Service, he maintained an insurance policy with the 1st Defendant with it's office at No.4 Awgu close off Faskaari crescent Area 3 Garki Abuja, within the jurisdiction of this Honourable Court.

13. That our late father died of cancer at NNPC Medical service clinic on the **4th day of December, 2021** under the care of our mother, **Mrs. Christiana Angiating**.
14. That our mother, **Mrs. Christiana Angiating** single-handed without support or any financial assistance from anybody including our kinsmen, footed the bill of not only his medical expenses while he was sick in Abuja but also the burial expenses of our father **Late Mr. Angiating Ashibi Godwin**.
15. That while we were still mourning our late father, some unknown persons illegally took steps to impersonate the children of our Late father, **Ashibi Godwin Angiating** in order to collect the death certificate from Medical Service Clinic in order to claim his pension from the 1st Defendant.
16. The said unknown person even visited the 1st Defendant requesting for the pension fund to be released to them.
17. That during the lifetime of our father, **Late Mr. Angiating Ashibi Godwin**, he listed out the Claimants including me, as his Next of Kin and beneficiaries of his Estate.
18. That at the demise of our father, in pursuant of his death benefits, we approached our father's last place of work, Federal College of Education, Obudu for issuance of letter of introduction to Probate Section of High Court of FCT for processing of letter of Administration over his Estate.
19. That on **19th July, 2022** the Federal college of Education Obudu issued the letter of introduction addressed to that Probate Registrar of High Court of FCT and with the said letter we approached the Probate Section of High Court of FCT for issuance of letter of Administration over the estate of their father. **A copy of the said letter of introduction issued by Federal college of Education, obudu, Cross River State dated 19th July, 2022 is herein delivered as Exhibit B.**

20. That by **Exhibit B**, the Federal college of Education Obudu, Cross-River introduced me and my siblings, the 1st and 3rd Claimants as the Next of Kin of **Late Mr. Angiating Ashibi Godwin**.
21. That pursuant to the receipt of the letter of introduction from Federal College of Education, Obudu, Cross River State, the Claimants observing the efforts of some unknown persons who did not allow the mourning period to elapse in attempting to access our Late Father's pension fund caused us to retain the services of **Ikechukwu Ezechukwu SAN & Co** to place a Caveat on the pension account of our late father. **A copy of the said Demand letter to the 1st Defendant to place Caveat on the said account is herein delivered as Exhibit C.**
22. That after a rigorous process on the **10th October, 2024** the Registrar of Probate of High Court of FCT issued letter of administration to the Claimants. **A copy of the said Letter of Administration at the hearing of this case issued to the Claimants is herein attached as Exhibit D.**
23. That upon the receipt of the letter of Administration, that we as the Administrators, through our solicitors, **Ikechukwu Ezechukwu SAN & Co** wrote to the 1st Defendant vide a letter dated **7th November, 2024**, notifying the 1st Defendant of the issuance of the letter of administration to me and the other Claimants as biological children of the **Late Mr. Angiating Ashibi Godwin** and consequently, demanded for the release of pension funds of our deceased father with **Pension No: 100060918055** and that the payment should immediately be made into my account. **A copy of the Acknowledged letter dated 7th November, 2024 and addressed to the 1st Defendant is herein Attached as Exhibit E.**

24. That eventually by a letter dated **22nd November, 2024** the 1st Defendant responded claiming that there was a discrepancy between the Next of Kin as contained in the Letter of Administration and that in their database and that **"in the best interest of the RSA holders and to protect the pension fund"** that they have **"consequently, Initiated an investigation to unravel the conflicting facts ..."**. **A copy of the said letter is herein delivered as Exhibit F.**
25. That after waiting for a period of time for the conclusion of investigation and upon our persistent disturbance, the 1st Defendant on **4th February, 2025** wrote another letter, claiming that one **MRS. FELICIA ABIYE-ANGIATING**, the 2nd Defendant was written as the Next of Kin on the 1st Defendant's database and that she was contacted of the current development of the Claimants' demand as a result of the Letter of Administration issued to the Claimants. **A copy of the said letter from the 1st Defendant to our Solicitor is herein delivered as Exhibit G.**
26. The 1st Defendant vide **Exhibit G** informed our solicitor that the 2nd Defendant acknowledged the information of issuance of Letter of Administration to us and requested to be given till **March, 2025** to reach out to some family members as she was on transit.
27. That we waited and we did not hear from any of the Defendants or even the family members that they claimed that they are consulting.
28. That the 1st Defendant was of the opinion, vide **Exhibit G** that there was an unresolved beneficiary conflicts and will therefore not approve for the payment to be made to us. The 1st Defendant further advised us to explore alternative means of contacting the other beneficiaries while they continue to

follow up with the additional "NOKs" (Next of Kin) listed in the 1st Defendant's records.

29. That we reached out to family members and informed them of the development while waiting for the outcome of the discussion between the Defendants.

30. That the discussion among family members did not yield any result as they said that there is not much they can do as we already have the letter of administration and the 1st Defendant did not get back to us again.

31. That we subsequently after further waiting and not hearing from the defendants caused another letter dated 11th December, 2025 through our solicitors to be served on the 1st Defendant expressing disappointment at their inability to revert back to the Claimants. ***A copy of the said letter is herein delivered as Exhibit H.***

32. That I know as a fact that once the letter of administration has been issued to us as administrators of the Estate of our father, that no pension fund administrator has a discretion to disregard it on the basis of Next of Kin.

33. That I also know as a matter of fact that a Next of Kin is not a beneficiary in law.

34. That I know as a fact that the 1st Defendant by its refusal to honour the letter of Administration over the Estate of our father, **Late Mr. Anglating Ashibi Godwin** issued to us, the Claimants by the Probate Registrar of the High Court of Federal Capital Territory and release the pension fund to us has:

- i. Disobeyed subsisting Court instrument.
- ii. Usurped probate jurisdiction and
- iii. Unlawfully withheld estate property from the Claimants.

35. That I was further informed by **Ifeanyi M. Nriahike** of counsel to the Claimants in his office on 15th of December, 2023 at about 2pm of the facts set out hereunder, which said facts I verily believe to be true as follows that :

- i. Upon presentation of the Letters of Administration to the 1st Defendant, that the 1st Defendant has no power to refuse to release the pension benefits to us.
- ii. The 1st Defendant claim that the nomination of the 2nd Defendant by the deceased excluded the Claimants from accessing the pension benefits is wrong, unlawful and illegal.
- iii. The 1st Defendant has no statutory authority under the **Pension Reform Act, 2014** and even under the **Revised Regulation on the Administration of the Retirement and Terminal Benefits** to disregard or override Letters of Administration issued by this Honourable Court.

36. The 1st Defendant's refusal has caused hardship, delay, and injustice to the Estate of **Late Mr. Anglating Ashibi Godwin** and to the Claimants as the Administrators.

37. That because of the of the 1st Defendant to honour the Letter of Administration, the Claimants have incurred heavy expenses in terms of payment of Legal Fees to their Solicitors and sundry expenses.

38. That unless compelled by this Honourable Court, the 1st Defendant will continue to unlawfully withhold the estate funds.

39. That the Claimants are entitled to damages for the unlawful act of the 1st Defendant.

40. It is in the interest of justice to grant the claims of the Claimants in this case including the monetary damages.

41. That I depose to this Affidavit in good faith, conscientiously believing same to be true and correct in accordance with the Oaths Act currently in force.

Samuel

DEPONENT

Sworn to the Registry of the High Court of FCT, Abuja

This... *21* ... day of ... *01* ...

BEFORE ME
COURT OF OATH
COMMISSIONER FOR OATH
ABUJA
OKONKWO L.

[Signature]

[Signature]

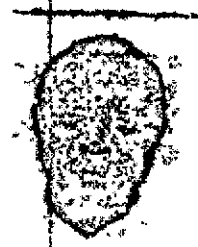
[Large checkmark]



EXHIBIT A

August 3, 2022

Mr ANGIATING ASHIB GODWIN
FEDERAL COLLEGE OF EDUCATION OBUDU
PMB 1038 OBUDU
CROSS RIVER



Dear Mr ASHIB,

PREMIUM PENSION LIMITED RETIREMENT SAVINGS ACCOUNT ENROLLMENT

We are pleased to inform you that your application to open a Retirement Savings Account (RSA) with Premium Pension Limited has been processed. The following are your membership details;

Personal Identification Number (PIN): **PEN100060918055**

Please give your Employer your Personal Identification Number (PIN) and request the remittance of your total monthly contribution (Employer plus Employee) to our custodian, First Pension Custodian Nigeria Limited through First Bank Account No: **FPCNL-RE PPL CONTRIBUTION - 2006857970**.

To Access your Retirement Savings Account (RSA), kindly download the **Premium Pension Mobile App** on Google Play Store or Apple App Store. You can also access this on your web browser by registering on <https://mobile.premiumpension.com/web>. Please REGISTER as a new user once you download the app or access the web version. Create a username and password of your choice to complete registration. An activation link will be sent to your registered email address. Click the link to activate and you may log in after that.

For enquiries, change of employment or address, kindly quote the above membership details.

Your Statement of Account will be sent to you via email (client email) on quarterly basis or on request. Should you require a different means of receiving your statement, please contact us through your Account Officer.

For any further enquiry please contact our Customer Service Unit on 09-4615700 or email us through csu@premiumpension.com or your Account Officer. jnotumahana@premiumpension.com

We thank you for giving us the opportunity to serve you and look forward to a mutually beneficial relationship.

Yours Sincerely
For: Premium Pension Limited

Maryam L. Mohammed (Mrs.)
Head, Operations



FEDERAL COLLEGE OF EDUCATION OBUDU

PMB 1038 OBUDU CROSS RIVER STATE



*Pensions/Gratuity Unit
Registry Department*

July 19, 2022

FCE/OB/PEN846VOL.V/74

*The Probate Registrar
FCT High Court of Justice
Maitama, Abuja*

Sir/Madam

LETTER OF INTRODUCTION

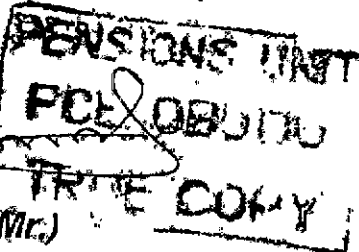
I write on directives herein that the underlisted are the duly nominated next-of-kin to late **Mr. Godwin A. Angiating**, who until his death was a staff processing his online Retirement Registration.

Please, you are required to accord them the necessary assistance needed in respect of the letter of Administration.

1. Dr. Greg Ukeh Angiating - 34%
2. Mr. Gift Unimke Angiating - 33%
3. Miss Prisca Biwom Angiating - 33%

Thanks.

Kintum, Godwin Ushie (Mr.)
Pension Desk Officer
For: Registrar





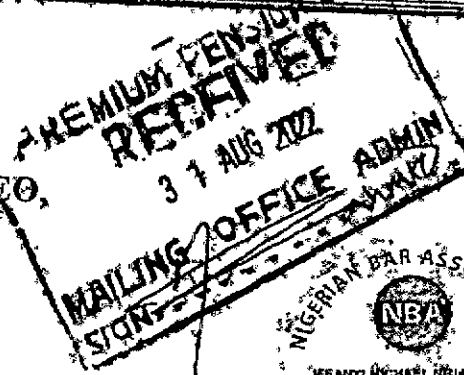
IKECHUKWU EZECHUKWU, SAN & CO

OGBUENI CHAMBERS
BARRISTERS, SOLICITORS & NOTARY PUBLIC

No 2A, Tanga Street, Zone 6, Wuse Ab.
Tel: 0708405190, 081031231
Email: ikechukwu@ikeychukwuandco.com
ikeychukwu@ikeychukwuezechukwuandco.com
web: www.ikeychukwuezechukwuandco.com

Our Ref:

YOUR REF:



31st August, 2022.

The Managing Director/CEO,
Premium Pension LTD,
No. 4 Awgu Close,
Off Faskaari Crescent,
Area 3,
Garki-Abuja

Dear Sir,

DEMAND TO PLACE ON HOLD/CAVEAT FURTHER PROCESSING OF ALL TRANSACTIONS IN RESPECT OF THE BENEFIT TO LATE MR ANGIATING ASHIB GODWIN WITH POLICY NO. PEN 100060918055.

We are Solicitors to all the **Biological** Children of late Mr. Angiating, Ashib Godwin, Namely, Dr. Greg Ukeh Angiating, Mr. Gift Unimke Angiating and Miss Prisca Biwom Angiating (herein after refer to as "Our Clients", and on their authority we write.

Our Clients are the known **"BIOLOGICAL CHILDREN"** of Late Mr. Angiating, Ashib Godwin. Their late father, Mr. Godwin Ashib Angiating worked and retired from Federal College of Education Obudu, Cross-River State.

During the course of his active from Federal Civil Service, he maintained an insurance policy with your company and made contribution as required. His pension policy, No. is Pen 100060918055.

It is on record that Our Clients are his **ONLY BIOLOGICAL CHILDREN** and they are all grown up. The first Son, Dr. Ukeh is 36

years, the Second son, Mr. Gift is 34 years and the only daughter, Miss Prisca is 32 years.

It is equally on record that Our Clients' Mother, Mrs. Christiana Angiating single handed took care of Mr. Godwin Ashib Angiating while he was sick. Late Mr. Godwin suffered cancer from 2016 to 2021, and during this period of sickness, treatment was carried out under the financial cover of his wife, and incidentally our Clients' mother at **NNPC Medical Services Clinic** where our Clients' mother collaborated with referral to **National Hospital Abuja** under the **Special Consultancy** care of one Dr. Igbenobas Team.

Incidentally, Our clients' husband died in **NNPC Medical Services Clinic** on 4th of December, 2021 and he was buried on the 28th of December 2021.

Our clients and their mother singlehandedly without any financial assistance from anybody, including the kinsmen, foot the bill of the burial expenses.

IT HAS AS COME TO OUR CLIENT'S that some persons, without allowing period of time to mourn his demise have gone ahead to start processing his pension with one of the impersonators claiming to be Our Clients' father's brother.

IT HAS EQUALLY COME TO OUR CLIENT'S KNOWLEDGE that one **Mr. Bonnie Adie**, our clients' fathers friend and **Mr. Moses Kanjang**, the house boy to our client's father were sent by a woman parading herself as Our Clients' 2nd wife to impersonate as Our Clients' uncle and son of Our clients' father respectively in order to collect his Death Certificate from **NNPC Medical Services Clinic** in order to claim his Pension from the fund Administrator.

OUR DEMAND

IT IS THEREFORE OUR BRIEF to demand as follows:

1. That all access to **Late Mr. Ashib Godwin Angiating's Pension Fund Account** be stopped **immediately** for everybody except Our clients, his **Biological** children.

Premium
Pension

EXHIBIT 4

PPL/BA/IE&CO/2025/01

4th February, 2025

The Principal Partner
Ikechukwu Ezechukwu, SAN & Co
No. 2, Tanga Street, Zone 6
Wuse FCT - Abuja
lordanyilike@gmail.com
08036051638

Dear Sir/Ma

RE: NOTIFICATION OF ISSUANCE OF LETTER OF ADMINISTRATION AND DEMAND TO RELEASE FUNDS IN THE ACCOUNT OF LATE MR. ANGIATING, ASHIE GODWIN WITH POLICY NO. PEN100060918055

Reference is made to your letter dated 7th day of November 2024 and our response dated 22nd November 2024.

Kindly recall our response dated 22nd November 2024, in which we committed to investigate the conflicting information regarding the Next of Kin (NOK) stated in our records, as well as the beneficiaries mentioned in your letter.

In compliance with Section 4.5.1 of the Revised Regulation on the Administration of Retirement & Terminal Benefits, we contacted Mrs. Felicia Abiye Angiating (Next of Kin on our database) to inform her of the current development. She acknowledged the information and indicated her intention to reach out to some family members for further collaboration. However, she explained that she would be on transit until March 2025 but assured us of further communication, which we are yet to receive as of the date of this letter.

As previously stated in our letter, we remain fully committed to supporting the beneficiaries in expediting the death benefits process. However, despite our willingness to assist, regulatory provisions require us to ensure that any conflicting interest among beneficiaries are resolved before processing payment and submitting the application for regulatory approval. It is important to note that applications involving unresolved beneficiary conflicts will not be approved for payment.

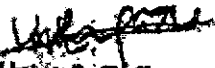
As we explore all internal and regulatory verification processes, we kindly implore you to advise your clients to exercise patience while we conclude the necessary investigations. Rest assured, Premium Pension Limited, as a responsible corporate entity, is fully committed to adhering to regulatory guidelines and will ensure that the available balance in the deceased's RSA is paid to the legal beneficiaries accordingly.

Please convey our heartfelt condolences to your clients on the demise of Mr. Anglatho Ashib Godwin and accept our highest regards.

Thank you.

Yours faithfully,

For, **PREMIUM PENSION LIMITED.**


Umar A. Bello
Head, Terminal Benefit


Funmi Femi Olatunji
Head, Benefit Administration



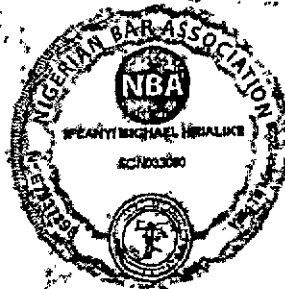
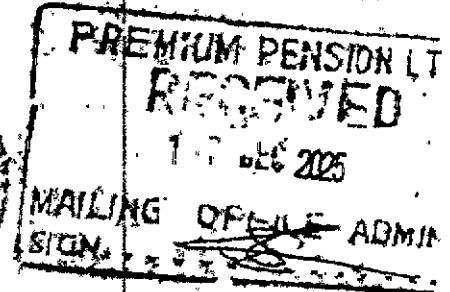
OGBUELI CHAMBERS
BARRISTERS, SOLICITORS & NOTARY PUBLIC

No 2A, Tangai Street, Zone 6, Wuse Abu
Tel: 0708405190, 081031235
Email: kachuluwue@zon6wuse.com
kachuluwuezone6wuse.com
kachuluwuezone6wuse.com

Your Ref:

11th December, 2025

The Managing Director/CEO,
Premium Pension LTD,
No. 4 Awgu Close,
Off Faskaari Crescent,
Area 3,
Garki, Abuja.



Dear Sir,

NOTIFICATION OF ISSUANCE OF LETTER OF
ADMINISTRATION AND DEMAND TO RELEASE FUNDS IN
THE ACCOUNT OF LATE MR. ANGIATING, ASHIB
GODWIN WITH POLICY NO. PEN 100060918955 TO THE
NAMED ADMINISTRATORS OF HIS ESTATE, NAMELY
DR. GREG UKEH ANGIATING, MR GIFT UNIMKE
ANGIATING, MISS PRISCA BIWOM ANGIATING.

We are still Solicitors to all the Biological Children/ who are now the Administrators of the Estate of Late Mr. Angiating, Ashib Godwin, Namely, Dr. Greg Ukeh Angiating, Mr. Gift Unimke Angiating and Miss Prisca Biwom Angiating (herein after refer to as "Our Clients", and on their authority we write.

Your letter dated 4th February, 2025 refers. In the said letter, you stated that Mrs. Felicia Abiye-Angiating "acknowledged the information we relate to you in our last

2. That any Death Certificate Presented by anybody whether as photocopy or purported "**ORIGINAL**" (if "**Original**" it is **forged**), Should be discountenanced, as the original death certificate is in the custody of our clients. Anybody or Authority that countenances any death certificate, apart from the one from our clients, should be ready to face the Legal action.
3. The funds deposited in the account of late **Mr. Ashib Godwin Angiating** should not be released to any person or persons outside his legally identified children at due time, which in any case are "**OUR CLIENTS**".

TAKE FURTHER NOTICE that if our Demands are not met and complied with, our services have been retained to commence legal action to seek redress.

Please accept assurance of Our Clients' highest regards.

Thank you

Yours Faithfully,

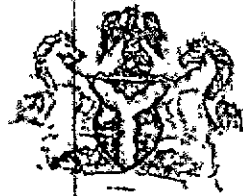
For: **Ikechukwu Ezechukwu, SAN & CO.**


Ikeanyi M. Nhalike, Esq.

08036051638



EXHIBIT D
Probate Registry
High Court
Federal Capital Territory, Nigeria
Plot 426, Tigns Crescent, Maitama, F.M.B. 89, Abuja.



Reference number: FCT/HC/PM/1980/2022

IN THE MATTER OF AN APPLICATION FOR THE GRANT OF
PROBATE/LETTERS OF ADMINISTRATION OF THE ESTATE OF
EATAC C DWIN (AKA) ANGIATING ASHEB GODWIN (AKA) GODWIN A. ANGIATING
(DECEASED)

and Letters of Administration issue to the Petitioners:

MR ANGIATING GIFT UNIMKE (AKA) MR GIFT UNIMKE ANGIATING OF
PEACE COURT EST. LOKOGOMA ABUJA and MS ANGIATING PRISCA
BIWOM (AKA) MISS PRISCA BIWOM ANGIATING OF PEACE COURT EST.
LOKOGOMA ABUJA, as administrators, being the SON and DAUGHTER.

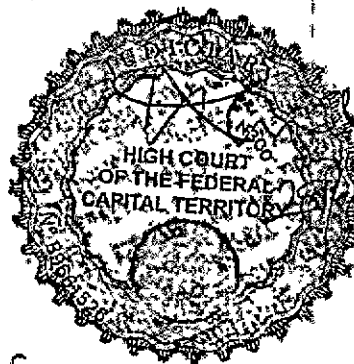
PROVING THE FOLLOWING:

1. Petition for Letters of Administration/Probate dated the 29th day of August, 2022 was filed.
 2. Notices of Publication of the Petition have been publicly displayed in the Leadership Newspapers of 5th day of August, 2022 and/or published in the Gazette of the Federal Capital Territory of Nigeria.
 3. Oaths of the petitioners were sworn to and filed on the 29th day of August, 2022
 4. Administration Bond in the sum of N5500:00k was executed.
 5. Affidavits, namely, Ubua Anja Anyinukio and Ubua Vera Ahdolae justified and were accordingly
 6. All prescribed fees have been paid.
 7. No opposition was lodged or pending against the petition.
- ACCORDINGLY, may leave be granted by My Lord the Chief Judge of the Federal Capital Territory, clearing all prior approvals having been given with his assent.

DATED THIS 1st day of OCT, 2022

HIGH COURT OF FCT
Probate Registry
Name: _____
Probate Registrar...

ORDERED AS PRAYED.



Feasible
Seal of 200
date 29/10/24
Seal No B768/525

DATE

HIGH COURT OF THE FCT
CERTIFIED TRUE COPY
PROBATE
Name: _____

13/10/2022

IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY, ABUJA NIGERIA.
(PROBATE DIVISION)

NOTICE TO EXECUTORS AND ADMINISTRATORS

The attention of Executors, Administrators and of the public generally is hereby referred to
Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018.

Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018

Administration generally

41. (1) Every person to whom a grant of probate or letters of administration has or have been made and every administrator appointed by the Court shall, if called upon by the Court, file in Court the account of his administration and shall thereafter file such further periodic accounts as the Court may direct until the completion of the administration.
- (2) An executor or administrator who fails within any such period to file his account is as specified shall be liable to such penalty not less than N1,000.00 as a Court may think fit to impose, and every such fine shall, on non-payment, be enforceable by distress and where distress is insufficient, by imprisonment for a term not exceeding six months.
- (3) Where an account is filed in Court under this Rule, the Court shall scrutinize the account and if it appears to the Court that by reason of improper or unjustifiable entries on that the account is not a full and proper account, the Court may give written notice to the person filing the account to remedy such defects within such time as the Court may deem reasonable for the purpose, and on failure to remedy such defects within such time, the person who filed such defective account shall be taken to have failed to file an account within the meaning of this Rule, and proceedings may be taken against that person accordingly.
- (4) A Court may, on the motion of an interested party, or on its own, summon any executor or administrator failing to file account, to show cause why he should not be punished.
- (5) A Court may for good cause shown extend the time for such filing of accounts.
- (6) An executor or administrator who has been granted an extension of time to file such accounts and who fails within such extended time to file such accounts, shall be liable to the penalty stated above and the procedure for bringing him before the Court shall be invoked.
- (7) It shall be the duty of the Probate Registrar to bring to the notice of the Court the fact that any executor or administrator has failed to file his accounts as required by this Rule.
- (8) The accounts shall be open free of charge to the inspection of all persons satisfying the Probate Registrar that they are interested in the administration.
- (9) In this rule, the word "accounts" includes an inventory, an account of the administration, the vouchers in hands of the executor or administrator, and an affidavit in verification.

The Registry,
High Court of Justice
Federal Capital Territory

HIGH COURT OF THE FCT
CERTIFIED TRUE COPY
PROBATE

HIGH COURT OF FCT
Probate Department



Probate Registry High Court

Federal Capital Territory, Nigeria
Plot 426, Tigris Crescent, Maitama, P.M.B. 89, Abuja



Reference number: FCT/HC/PM/1980/2022

THE ESTATE OF: ANGIATING GODWIN (AKA) ANGIATING ASEH GODWIN (AKA)
GODWIN A. ANGIATING
DATE OF: BEBUAGBONG VILLAGE OBUDU, CROSS RIVER STATE
PLACE OF DEATH: NNPC MEDICAL SERVICES, MAITAMA, ABUJA
DATE OF DEATH: 4TH DAY OF DECEMBER, 2021

(PURSUANT TO ORDER 62 AND ORDER 64)

GRANT OF LETTER OF ADMINISTRATION (WITHOUT WILL)

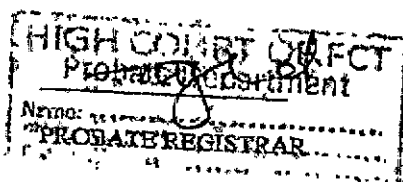
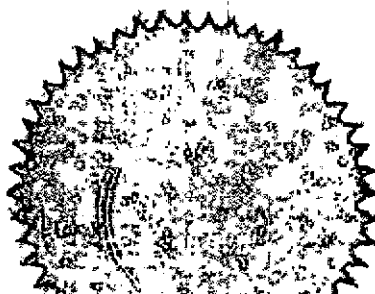
BE IT KNOWN that at the date hereunder written, letters of Administration of all the personal and real, movable and immovable property of the above-named deceased, as annexed in the continuation sheets, to these presents, was/were GRANTED to:

MR ANGIATING GIFT UNIMKE (AKA) MR GIFT UNIMKE ANGIATING of
PEACE COURT EST. LOKOGOMA ABUJA and MS ANGIATING PRISCA
BIWOM (AKA) MISS PRISCA BIWOM ANGIATING of PEACE COURT EST.
LOKOGOMA ABUJA as administrators, being the SON and DAUGHTER

The administrators, having been first sworn well and faithfully to administer the same by paying the just debts of the deceased and distributing the residue of the deceased's property according to law and render a just and true account of his/her administration whenever lawfully required.

With leave obtained from the Chief Judge of the Federal Capital Territory.

DATED THIS 10TH Day of OCT, 2024



HIGH COURT OF THE FCT
CERTIFIED TRUE COPY
PROBATE

Name: *Abdullah Yusuf*
Signature: *[Signature]*
Date: *29/10/2024*

2024/09/17H

IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY, ABUJA NIGERIA
(PROBATE DIVISION)

NOTICE TO EXECUTORS AND ADMINISTRATORS

The attention of Executors, Administrators and of the public generally is hereby referred to
Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018

Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018

Administration generally

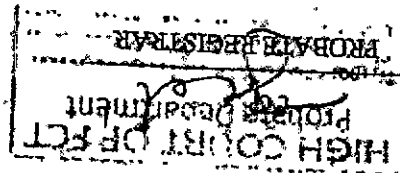
41. (1) Every person to whom a grant of probate or letters of administration has or have been made and every administrator appointed by the Court shall, if called upon by the Court, file in Court the account of his administration and shall thereafter file such further periodic accounts as the Court may direct until the completion of the administration.
- (2) An executor or administrator who fails within any such period to file his accounts as specified shall be liable to such penalty not less than N1,000,00 as a Court may think fit to impose, and every such fine shall, on non-payment, be enforceable by distress and where distress is insufficient, by imprisonment for a term not exceeding six months.
- (3) Where an account is filed in Court under this Rule, the Court shall scrutinize the account and if it appears to the Court that by reason of improper or unjustifiable entries or that the account is not a full and proper account, the Court may give written notice to the person filing the account to remedy such defects within such time as the Court may deem reasonable for the purpose, and on failure to remedy such defects within such time, the person who filed such defective account shall be taken to have failed to file an account within the meaning of this Rule, and proceedings may be taken against that person accordingly.
- (4) A Court may, on the motion of an interested party, or on its own, summon any executor or administrator failing to file account, to show cause why he should not be punished.
- (5) A Court may for good causes shown extend the time for such filing of accounts.
- (6) An executor or administrator who has been granted an extension of time to file such accounts and who fails within such extended time to file such accounts, shall be liable to the penalty stated above and the procedure for bringing him before the Court shall be invoked.
- (7) It shall be the duty of the Probate Registrar to bring to the notice of the Court the fact that any executor or administrator has failed to file his accounts as required by this Rule.
- (8) The accounts shall be open free of charge to the inspection of all persons satisfying the Probate Registrar that they are interested in the administration.
- (9) In this rule, the word "accounts" includes an inventory, an account of the administration, the vouchers in hands of the executor or administrator, and an affidavit in verification.

The Registry,
High Court of Justice
Federal Capital Territory
Abuja:

HIGH COURT OF THE FCT
CERTIFIED TRUE COPY
PROBATE

PROBATE REGISTRAR
FCT

2024/09/17H



Abuja Receipt Number: Z 12595080 dated 29/08/22

TOTAL	N5,500.00
Estate Fee	N
Drawing up Order for Grant	N500.00
Filing Death Certificate	N
Filing Particulars of Realty	N500.00
Sweeping Deponents on Justification of Sureties	N500.00
Justification of Sureties	N
Arresting Signature on Bond	N500.00
Filing Administration Bond	N500.00
Sweeping and Filing Administration Oath	N500.00
Sweeping and Filing Next of Kin Form	N500.00
Sweeping and Filing Inventory	N500.00
Application Fee	N1,500.00
Legal Notice (Deposit) Fee	

(as may be determined from time to time)

SCHEDULE OF FEES

DEATH BENEFITS
FEDERAL COLLEGE OF EDUCATION (FCE) (RTP)
FEE FOR COLLECTION
FEE FOR M PENSION LIMITED
100060918055

Reference number: BCT/HCT/PA/1980/2022



High Court of FCT
Probate Registry





ANNEXURE 2

Probate Registry High Court

Plot 426, Tigris Crescent, Maitama, P.M.B. 89, Abuja



Reference number: FCT HC PA/1980/2022

IN THE MATTER OF AN APPLICATION FOR THE GRANT OF PROBATE/LETTERS OF ADMINISTRATION OF THE ESTATE OF
LATE C. C. GODWIN (AKA) ANGLATING ASHIB GODWIN (AKA) GODWIN A. ANGLATING
(DECEASED)

And in the matter of Administration as to the Petitioners:

MR. ANGLATING GIFT UNIMKE (AKA) MR. GIFT UNIMKE ANGLATING, of
PEACE COURT EST. LOKOGOMA, ABUJA, and MS. ANGLATING PRISCA
BIWOM (AKA) MISS PRISCA BIWOM ANGLATING, of PEACE COURT EST.
LOKOGOMA, ABUJA, as administrators, being the SON and DAUGHTER.

AND THE FOLLOWING:

1. The Petition for Letters of Administration Probate dated the 29th day of August, 2022 was filed.
2. The Petition for Probate of the Petition have been publicly displayed in the Leadership Newspapers of 5th August, 2022 and/or published in the Gazette of the Federal Capital Territory of Nigeria.
3. The Petitioners were sworn to and filed on the 29th day of August, 2022.
4. A bond for bond in the sum of N5500:00k was executed.
5. The Petitioners, namely, Ubus Anika Anyigbo and Ubus Vera Andorje justified and were accordingly

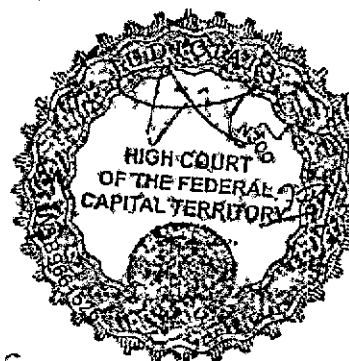
admitted to have been paid.

There are no objections or pending against the petition.

Accordingly, may leave be granted by My Lord the Chief Judge of the Federal Capital Territory, considering all prior requisites having been given with His assent.

DATED THIS 15th day of September, 2024

HIGH COURT OF THE FCT
Probate Registry



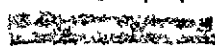
10/2/24

ORDERED AS PRAYED.

FEAS-ABO
SEAL 4300
date 29/10/24
Seal NOO 8965/5257

DATE

HIGH COURT OF THE FCT
CERTIFIED



IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY, ABUJA NIGERIA
(PROBATE DIVISION)

NOTICE TO EXECUTORS AND ADMINISTRATORS

The attention of Executors, Administrators and of the public generally is hereby referred to
Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018

Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018

Administration generally

- 41.(1) Every person to whom a grant of probate or letters of administration has or have been made and every administrator appointed by the Court shall, if called upon by the Court, file in Court the account of his administration and shall thereafter file such further periodic accounts as the Court may direct until the completion of the administration.
- (2) An executor or administrator who fails within any such period to file his accounts as specified shall be liable to such penalty not less than N1,000.00 as a Court may think fit to impose, and every such fine shall, on non-payment, be enforceable by distress and where distress is insufficient, by imprisonment for a term not exceeding six months.
- (3) Where an account is filed in Court under this Rule, the Court shall scrutinize the account and if it appears to the Court that by reason of improper or unjustifiable entries or that the account is not a full and proper account, the Court may give written notice to the person filing the account to remedy such defects within such time as the Court may deem reasonable for the purpose, and on failure to remedy such defects within such time, the person who filed such defective account shall be taken to have failed to file an account within the meaning of this Rule, and proceedings may be taken against that person accordingly.
- (4) A Court may, on the motion of an interested party, or on its own, summon any executor or administrator failing to file account, to show cause why he should not be punished.
- (5) A Court may for good cause shown extend the time for such filing of accounts.
- (6) An executor or administrator who has been granted an extension of time to file such accounts and who fails within such extended time to file such accounts, shall be liable to the penalty stated above and the procedure for bringing him before the Court shall be invoked.
- (7) It shall be the duty of the Probate Registrar to bring to the notice of the Court the fact that any executor or administrator has failed to file his accounts as required by this Rule.
- (8) The accounts shall be open free of charge to the inspection of all persons satisfying the Probate Registrar that they are interested in the administration.
- (9) In this rule, the word "accounts" includes an inventory, an account of the administration, the vouchers in hands of the executor or administrator, and an affidavit in verification.

e Registry,
gh Court of Justice

HIGH COURT OF THE FCT



**Probate Registry
High Court**
Federal Capital Territory, Nigeria
Plot 426, Tigris Crescent, Maitama, P.M.B. 89, Abuja.



Reference number: FCT/HC/PM/1980/2022

THE ESTATE OF: ANGIATING GODWIN (AKA) ANGIATING ASHIB GODWIN (AKA)
LATE OF: GODWIN A. ANGIATING
PLACE OF DEATH: JERUAGBONG VILLAGE OBUDU, CROSS RIVER STATE
DATE OF DEATH: NNPC MEDICAL SERVICES, MAITAMA, ABUJA
4TH DAY OF DECEMBER, 2021

(PURSUANT TO ORDER 62 AND ORDER 64)

GRANT OF LETTER OF ADMINISTRATION (WITHOUT WILL)

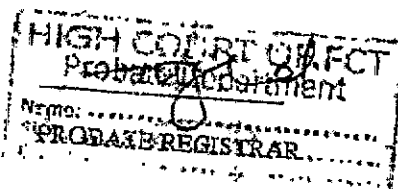
AS IT IS KNOWN that at the date hereunder written, letter of Administration of all the personal and real, moveable and immovable property of the above-named deceased, as annexed in the continuation sheets to these presents, was and are GRANTED to:

MR ANGIATING GIFT UNIMKE (AKA) MR GIFT UNIMKE ANGIATING of
PEACE COURT EST. LOKOGOMA ABUJA and MS ANGIATING PRISCA
BIWOM (AKA) MISS PRISCA BIWOM ANGIATING of PEACE COURT EST.
LOKOGOMA ABUJA as administrators, being the SON and DAUGHTER.

The administrators having been first sworn well and faithfully to administer the same by paying the just debts of the deceased and distributing the residue of the deceased's property according to law and render a just and true account of his/her administration whenever lawfully required.

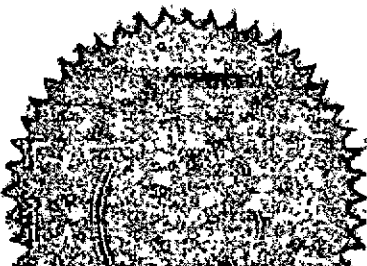
With leave obtained from the Chief Judge of the Federal Capital Territory.

DATED THIS 10th Day of OCT, 2024



HIGH COURT OF THE FCT
CERTIFIED TRUE COPY
PROBATE

Name: Abdullah Yusuf
Signature: [Signature]
Date: 19/10/2024



IN THE HIGH COURT OF THE FEDERAL CAPITAL TERRITORY, ABUJA, NIGERIA
(PROBATE DIVISION)

NOTICE TO EXECUTORS AND ADMINISTRATORS

The attention of Executors, Administrators and of the public generally is hereby referred to Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018.

Order 62 Rule 41 of the High Court (Civil Procedure) Rules, 2018

Administration generally

41. (1) Every person to whom a grant of probate or letters of administration has or have been made and every administrator appointed by the Court shall, if called upon by the Court, file in Court the account of his administration and shall thereafter file such further periodic accounts as the Court may direct until the completion of the administration.
- (2) An executor or administrator who fails within any such period to file his accounts as specified shall be liable to such penalty not less than N1,000.00 as a Court may think fit to impose, and every such fine shall, on non-payment, be enforceable by distress and where distress is insufficient, by imprisonment for a term not exceeding six months.
- (3) Where an account is filed in Court under this Rule, the Court shall scrutinize the account and if it appears to the Court that by reason of improper or unjustifiable entries or that the account is not a full and proper account, the Court may give written notice to the person filing the account to remedy such defects within such time as the Court may deem reasonable for the purpose, and on failure to remedy such defects within such time, the person who filed such defective account shall be taken to have failed to file an account within the meaning of this Rule, and proceedings may be taken against that person accordingly.
- (4) A Court may, on the motion of an interested party, or on its own, summon any executor or administrator failing to file account, to show cause why he should not be punished.
- (5) A Court may for good causes shown, extend the time for such filing of accounts.
- (6) An executor or administrator who has been granted an extension of time to file such accounts and who fails within such extended time to file such accounts, shall be liable to the penalty stated above and the procedure for bringing him before the Court shall be invoked.
- (7) It shall be the duty of the Probate Registrar to bring to the notice of the Court the fact that any executor or administrator has failed to file his accounts as required by this Rule.
- (8) The accounts shall be open free of charge to the inspection of all persons satisfying the Probate Registrar that they are interested in the administration.
- (9) In this rule, the word "accounts" includes an inventory, an account of the administration, the vouchers in hands of the executor or administrator, and an affidavit in verification.

The Registry,
High Court of Justice
Federal Capital Territory, Abuja

HIGH COURT OF THE FCT
Abuja

RECEIVED
2018



High Court of FCT
Probate Registry



IN THE COURT

Reference number: FCT/HC/PM/1980/2022

DEATH BENEFITS

FEDERAL COLLEGE OF EDUCATION OBUKU (RTO)

PERSONAL CONTRIBUTION

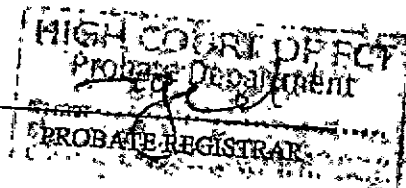
SPRAT PENS ON LIMITED

100060918055

SCHEDULE OF FEES

Legal Notice (Deposit) Fee	(as may be determined from time to time)
Application Fee	N1,500.00
Swearing and Filing Inventory	N500.00
Swearing and Filing Next of kin Form	N500.00
Swearing and Filing Administration Oath	N500.00
Filing Administration Bond	N500.00
Attesting Signature on Bond	N
Justification of Sureties	N500.00
Swearing Deponents on Justification of Sureties	N
Filing Particulars of Realty	N500.00
Filing Death Certificate	N
Drawing up Order for Grant	N500.00
Estate Fee	N
TOTAL	N5,500.00

Abuja Receipt Number: Z 12595080 dated 29/08/22



HIGH COURT OF THE FCT
CORRIGENDUM TRUE COPY
PROBATE
Name: *[Signature]*
Signature: *[Signature]*
Date: 29/08/2022

2022/11/01/10:11



EXHIBIT 27
IKECHUKWU EZECHUKWU, SAN & CO.

OGBUEN CHAMBERS
BARRISTERS, SOLICITORS & NOTARY PUBLIC

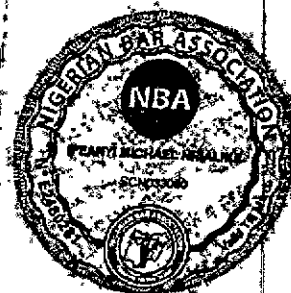
No 2A, Tanga Street, Zone 8, Wuse, Abuja
Tel: 0708405190, 08103123542
E-mail: ikechukwu@ikechukwusancos.com
ikechukwu@ikechukwusancos.com
web: www.ikechukwusancos.com

Our Ref:

Your Ref:

7th November, 2024

The Managing Director/CEO,
Premium Pension LTD,
No. 4 Awgu Close,
Off Faskaari Crescent, 15. 11. 2024
Area 3,
Garki, Abuja.



Dear Sir,

NOTIFICATION OF ISSUANCE OF LETTER OF
ADMINISTRATION AND DEMAND TO RELEASE FUNDS
IN THE ACCOUNT OF LATE MR. ANGIATING, ASHIB
GODWIN WITH POLICY NO. PEN-100060918055 TO
THE NAMED ADMINISTRATORS OF HIS ESTATE,
NAMESLY DR. GREG UKEH ANGIATING, MR GIFT
UNIMKE ANGIATING, MISS PRISCA BIWOM ANGIATING.

We are Solicitors to all the Biological Children/ who are
now the Administrators of the Estate of Late Mr.
Angiating, Ashib Godwin, Namesly, Dr. Greg Ukeh
Angiating, Mr. Gift Unimke Angiating and Miss Prisca
Biwom Angiating (herein after refer to as "Our Clients",
and on their authority we write.

Our letter dated 31st of August 2021 refers wherein we
demand on behalf of Our Client for a caveat to be placed in

respect of **Our Clients'** father's Policy with **Policy No. PEN100060918055** which was received on same day. *A copy of the acknowledged letter is herein attached.*

We wish to notify the company that the biological children of **Late Mr. Angiating Ashib Godwin** are now the **Administrators of the Estate of the Late Mr. Angiating Ashib Godwin**, namely **Dr. Greg Ukeh Angiating, Mr. Gift Unimke Angiating and Miss Prisca Biwom Angiating**

The Registrar of Probate of High Court of FCT has issued **Letter of Administration**, dated **10th of October 2024** to **Dr. Greg Ukeh Angiating, Mr. Gift Unimke Angiating and Miss Prisca Biwom Angiating** as administrators of his Estate, which also covers his Pension contributions while a staff of Federal College of Education, Obudu. *Herein annexed for your perusal and further necessary action is the Letter of Administration.*

Consequently, we humbly request for the release of funds (entitlement/benefit) of the deceased with pension number **100060918055** that has accrued over the years to the administrators who are the deceased biological children.

The payment should be made to the account of one of the administrators to wit: **Mr. Gift Unimke Angiating**

Bank: **United Bank For Africa**

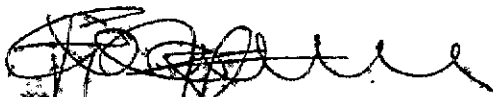
Account No: **2265125920**

We are looking forward to your prompt compliance.
Please accept assurance of our Clients' highest regards.

Thank you

Yours Faithfully,

For: **Ikechukwu Ezechukwu, SAN & CO**



Ifeanyi M. Nriahike, Esq.

08036051638.



IKECHUKWU EZECHUKWU, SAN & CO.

OGBUENI CHAMBERS
BARRISTERS, SOLICITORS & NOTARY PUBLIC

No. 26, Tangba Street, Zone 6, Wuse, Abuja
Tel: 0708405190/08103123542

E-mail: ikechukwu@ikechukwuezechukwuandco.com.ng
web: www.ikechukwuezechukwuandco.com.ng

Our Ref:

Your Ref:

PREMIUM PENSION
RECEIVED
31 AUG 2022

MAILING OFFICE ADMIN
SIGNATURE

31st August, 2022.

The Managing Director/CEO,
Premium Pension LTD,
No. 4 Awgu Close,
Off Faskari Crescent,
Area 3,
Garki-Abuja



Dear Sir,

**DEMAND TO PLACE ON HOLD/CAVEAT FURTHER PROCESSING
OF ALL TRANSACTIONS IN RESPECT OF THE BENEFIT TO LATE
MR ANGIATING ASHIB GODWIN WITH POLICY NO. PEN
100060918055.**

We are Solicitors to all the Biological Children of late Mr. Angiating Ashib Godwin, Namely, Dr. Greg Ukeh Angiating, Mr. Gift Unimke Angiating and Miss Prisca Biwom Angiating (herein after refer to as "Our Clients", and on their authority we write.

Our Clients are the known "BIOLOGICAL CHILDREN" of Late Mr. Angiating, Ashib Godwin. Their late father, Mr. Godwin Ashib Angiating worked and retired from Federal College of Education Obudu, Cross-River State.

During the course of his active from Federal Civil Service, he maintained an insurance policy with your company and made contribution as required. His pension policy No. is Pen 100060918055.

It is on record that Our Clients are his ONLY BIOLOGICAL CHILDREN and they are all grown up. The first Son, Dr. Ukeh is 36

years, the Second son, Mr. Gift is 34 years and the only daughter, Miss Prisca is 32 years.

It is equally on record that Our Clients' Mother, Mrs. Christiana Angiating single handed took care of Mr. Godwin Ashib Angiating while he was sick. Late Mr. Godwin suffered cancer from 2016 to 2021, and during this period of sickness, treatment was carried out under the financial cover of his wife, and incidentally our Clients' mother at **NNPC Medical Services Clinic** where our Clients' mother collaborated with referral to **National Hospital Abuja** under the **Special Consultancy** care of one Dr. Igberobas Team.

Incidentally, Our clients' husband died in NNPC Medical Services Clinic on 4th of December, 2021 and he was buried on the 28th of December 2021.

Our clients and their mother singlehandedly without any financial assistance from anybody, including the kinsmen, foot the bill of the burial expenses.

IT HAS AS COME TO OUR CLIENTS that some persons, without allowing period of time to mourn his demise have gone ahead to start processing his pension with one of the impersonators claiming to be Our Clients' father's brother.

IT HAS EQUALLY COME TO OUR CLIENTS KNOWLEDGE that one Mr. Bonnie Adie, our clients' fathers friend and Mr. Moses Kanjang, the house boy to our client's father were sent by a woman parading herself as Our Clients' 2nd wife to impersonate as Our Clients' uncle and son of Our clients' father respectively in order to collect his Death Certificate from **NNPC Medical Services Clinic** in order to claim his Pension from the fund Administrator.

OUR DEMAND

IT IS THEREFORE OUR BRIEF to demand as follows:

1. That all access to Late Mr. Ashib Godwin Angiating's Pension Fund Account be stopped **immediately** for everybody except Our clients, his **Biological** children.

2. That any Death Certificate Presented by anybody whether as photocopy or purported "**ORIGINAL**" *IF "Original" it is forged*), Should be discountenanced, as the original death certificate is in the custody of our clients. Anybody or Authority that countenances any death certificate, apart from the one from our clients, should be ready to face the legal action.
3. The funds deposited in the account of late **Mr. Ashib Godwin Angiating** should not be released to any person or persons outside his legally identified children at due time, which in any case *are* "**OUR CLIENTS**".

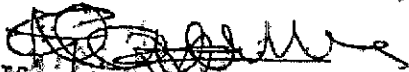
TAKE FURTHER NOTICE that if our Demands are not met and complied with, our services have been retained to commence legal action to seek redress.

Please accept assurance of Our Clients' highest regards.

Thank you

Yours Faithfully,

For: **Ikechukwu Ezechukwu, SAN & CO.**



Ifeanyi M. Nwalike, Esq.

08036051638.

EXHIBIT F



PPL/OS/BA/IE&CO/2024/01

22nd November 2024

The Principal Partner
Ikechukwu Ezechukwu, SAN & Co
No. 21, Tanga Street, Zone 6
Wuse FCT - Abuja
Ikechukwu@pension@yahoo.com
08103123542

Dear Sir/Ma

RE: NOTIFICATION OF ISSUANCE OF LETTER OF ADMINISTRATION AND DEMAND TO RELEASE FUNDS IN THE ACCOUNT OF LATE MR. ANGIATING, ASHIB GODWIN WITH POLICY NO. PEN100060918055 TO THE NAMED ADMINISTRATORS OF HIS ESTATE NAMELY DR. GREG UKEH ANGIATING, MR. GIET UNIMKE ANGIATING, MISS PRISCA BIWON ANGIATING

Reference is made to your letter dated 7th day of November 2024 on the above subject.

This is to confirm to you that late Mr. Angiating Ashib Godwin had maintained a Retirement Savings Account (RSA) PEN100060918055 with our Company.

We acknowledge the receipt of your letter, informing us that a Letter of Administration (LOA) has been granted to Dr. Greg Ukeh Angiating, Mr. Giet Unimke Angiating and Miss Prisca Biwon Angiating whom you have identified "as the only biological heirs of the deceased". Upon receipt of the letter and submitted documents, contrary to your claims we observed that Dr. Greg Ukeh Angiating was not included on the LOA.

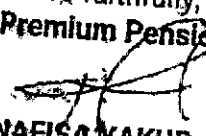
We also discovered a discrepancy between our records and the information provided, such that the Late Mr. Angiating Ashib Godwin listed his wife and son as his Next of Kin (NOK), which we observed were not the same with the names listed on the LOA granted by the Court of your letter.

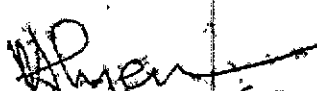
It is however imperative to state that Premium Pension Limited (PPL) as a Pension Fund Administrator (PFA), has an unfettered duty to act in the best interest of our RSA holders and protect the pension funds entrusted on us. Consequently, we had initiated an investigation to unravel the conflicting facts particularly given your assertion that your clients are "the only biological children of the deceased", while our records indicates otherwise.

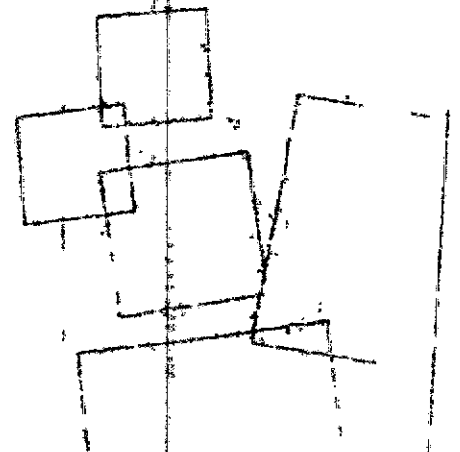
We kindly advise your clients to explore alternative means of contacting the other beneficiaries, while we continue to follow up with the additional NOKs listed on our records.

Thank you for your cooperation and understanding.

Yours faithfully,
Premium Pension Limited


NAFISA YAKUB
Head Terminal Benefits


FUNMI FEMI-OBALEMO
For Head, Benefits Department



IN THE HIGH COURT OF FEDERAL CAPITAL TERRITORY
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT NO:

IN THE MATTER OF AN APPLICATION FOR THE
INTERPRETATION AND ENFORCEMENT OF RIGHTS
ARISING FROM THE PENSION REFORM ACT, 2014
BETWEEN

1. DR. GREG UKEL ANGIATING
2. MR. GIFT UNIMKE ANGIATING
3. MISS PRISCA BIWOM ANGIATING - CLAIMANTS

*(Suing as the Administrator of the
Estate of late Ashib Godwin Angiating)*

AND

1. PREMIUM PENSION LIMITED
 2. MRS. FELICIA ABIYE ANGIATING
- DEFENDANTS

WRITTEN ADDRESS IN SUPPORT

1.0. INTRODUCTION

1.1. The Claimants by Originating Summons filed before this Court are seeking for determination of the following questions:

- i. *Whether upon the death of a Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, the Pension Fund Administrator, PREMIUM PENSION LIMITED, is legally bound to release the pension benefits to duly appointed Administrators of the Estate of Late Ashib Godwin Angiating upon presentation of Letters of Administration.*
- ii. *Whether the nomination of the 2nd Defendant by a deceased Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, overrides or excludes the Authority of Administrators appointed by competent High Court of Federal Capital Territory.*

- iii. Whether the refusal of the 1st Defendant, **PREMIUM PENSION LIMITED**, to release the deceased's pension benefits to the Claimants despite valid Letters of Administration is unlawful, ultra vires, and contrary to the Pension Reform Act, 2014.
- iv. Whether the Claimants are entitled to an Order of this Honourable Court compelling the 1st Defendant to release the deceased's pension benefits forthwith to the Claimants.
- v. Whether the Claimants are entitled to monetary damages.

1.2. The Claimants are subsequently seeking for the following reliefs:

- a. **A DECLARATION** that upon the death of **Late Ashib Godwin Angiating**, his Retirement Savings Account with Pension Policy Identification Number is **I00060918055** maintained with the 1st Defendant formed part of **Late Ashib Godwin Angiating's** Estate and became subject to administration by the 2nd and 3rd Claimants pursuant to the Letters of Administration granted by the High Court of the Federal Capital Territory.
- b. **A DECLARATION** that the purported Nomination of the 2nd Defendant by the deceased, **Late Ashib Godwin Angiating** as his Next of Kin in the 1st Defendant's database during his lifetime does not override, invalidate, or exclude the legal authority of the Claimants as Administrators of the Estate of **Late Ashib Godwin Angiating**.
- c. **A DECLARATION** that the 1st Defendant's refusal to release the pension benefits of the deceased, **Late Ashib Godwin Angiating** to the Claimants upon presentation of valid Letters of Administration is

unlawful, wrongful, and contrary to the provisions of **Section 8(2) of the Pension Reform Act, 2014.**

- d. **AN ORDER** compelling the 1st Defendant to release and pay over forthwith to the Claimants, all pension benefits standing to the credit of **Late Ashib Godwin Angiating Retirement Savings Account.**
 - e. **AN ORDER** directing the 1st Defendant to within 30 days of delivering this Judgment or such period as this Court may deem necessary, render a full account of all contributions, accrued rights, interests, and returns in respect of **Late Ashib Godwin Angiating's Retirement Savings Account.**
 - f. **GENERAL DAMAGES** in the sum of **₦500,000,000.00 (Five Hundred Million Naira)** to the Claimants by the 1st Defendant for unlawful withholding of **Late Ashib Godwin Angiating's Estate property.**
 - g. **COSTS** of this action.
- 1.3. The Claimant in support of this Originating Summons filed an affidavit of **41 paragraphs** and **8 Exhibits** Marked as Exhibits **A, B, C, D, E, F, G, & H.** The Affidavit is deposed to by one **MR. GIFT UNIMKE ANGIATING**, the 2nd Claimant herein.
- 1.4. My Lord, this action concerns a direct affront to statutory estate administration by a Pension Fund Administrator who has arrogated to itself powers unknown to law. The issue is not complex, nor controversial. It is purely legal and we urge the Court to grant the prayers sought.

2.0. BRIEF STATEMENT OF FACTS

- 2.1. The facts of this case is as contained in the Affidavit in support of this application. This is a case that calls for the interpretation of the powers of Pension Fund Administrators.
- 2.2. The Claimants at all times material to this suit are children of **Late Ashib Godwin Angiating**, who died intestate on 4th

December, 2021. The 1st Defendant is an Insurance Company with its head office at No.4 Awgh close off Faskaari crescent Area 3 Gariki Abuja, within the jurisdiction of this Honourable Court, wherein the Claimant's father maintained an insurance policy while the 2nd Defendant is the person whom the 1st Defendant claimed that our father, Late Ashib Godwin Anglating, who died intestate named in the 1st Defendant's database as his Next of Kin.

2.3. The Claimant's father, Late Mr. Anglating Ashibi Godwin worked at Federal College of Education, Obudu, Cross River State before his retirement and suffered cancer from 2016 to 2021. He unfortunately died on 4th December, 2021 and was buried on 28th December, 2021.

2.4. The Late Mr. Anglating Ashibi Godwin during his active time in Federal Civil Service, commenced the Registration of an insurance policy with the 1st Defendant and made contributions as required and his Pension Policy Identification Number is 100060918055.

2.5. The Claimants' father had no other biological children outside the three (3) of the herein Claimants and he was in his lifetime lawfully married to the Claimants' mother Mrs. Christiana Anglating and had three of the herein Claimants as their children.

2.6. Late Mr. Anglating Ashibi Godwin who worked at Federal college of Education Obudu Cross-River State, as at the time of his death stated the Claimants as beneficiaries of his Estate.

2.7. The Claimants' mother, Mrs. Christiana Anglating single-handed without support or any financial assistance from anybody including their kinsmen, footed the bill of not only Late Mr. Anglating Ashibi Godwin medical expenses while

3

he was sick in Abuja but also his burial expenses after his death.

2.8. While the family was still mourning over the death of their patriarch, some unknown persons illegally took steps to impersonate his children, the Claimants, in order to collect the Death Certificate from Medical Service Clinic and to claim his pension from the 1st Defendant. The said unknown person even visited the 1st Defendant requesting for the pension fund to be released to them including attempting to seek letter of introduction from the Claimants' father's last place of service in order to access his pension fund. Incidentally, the Claimants' father, **Late Mr. Anglating Ashibi Godwin**, listed out the Claimants, as his Next of Kin and beneficiaries of his Estate.

2.9. The Claimants at the demise of their father, in pursuant of his death benefits, approached their father's last place of work, Federal College of Education, Obudu, Cross-River State for issuance of letter of introduction to Probate Section of High Court of FCT for processing of letter of Administration over his Estate. On **19th July, 2022** the Federal college of Education Obudu issued the letter of introduction addressed to that Probate Registrar of High Court of FCT and with the said letter, the Claimants approached the Probate Section of High Court of FCT for issuance of letter of Administration over the estate of their father. The letter of Introduction is **Exhibit B** herein while the Letter Notifying the **Late Mr. Anglating Ashibi Godwin** of the successful opening of his Retirement Savings Account is attached in the Affidavit in support of the Originating Summons as **Exhibit A**.

2.10. That pursuant to the receipt of the letter of introduction from Federal College of Education, Obudu, Cross River State, the Claimants observing the efforts of some unknown persons

who did not allow the mourning period to elapse in attempting to access their Late Father's pension fund caused us to retain the services of **Ikechukwu Ezechukwu SAN & Co** to place a Caveat on the pension account of their late father. **A copy of the said Demand letter to the 1st Defendant to place Caveat on the said account is Exhibit C.**

2.11. After a rigorous process, the Registrar of Probate of High Court of FCT on the **10th October, 2024** issued letter of administration to the Claimants. It is **Exhibit D.**

2.12. That upon the receipt of the letter of Administration, that we as the Administrators, through our solicitors, **Ikechukwu Ezechukwu SAN & Co** wrote to the 1st Defendant vide a letter dated **7th November, 2024**, notifying the 1st Defendant of the issuance of the letter of administration to me and the other Claimants as biological children of the **Late Mr. Angiating Ashibi Godwin** and consequently, demanded for the release of pension funds of their deceased father with **Pension No: 100060918055** and that the payment should immediately be made into the 2nd Claimant's account.

2.13. Instead of complying with the Letter of Administration as instrument of law, on the **22nd of November, 2024** the 1st Defendant responded claiming that there was a discrepancy between the Next of Kin as contained in the Letter of Administration and that in their database and that **"in the best interest of the RSA holders and to protect the pension fund"** that they have **"consequently, ... Initiated an investigation to unravel the conflicting facts ..."**. A copy of the said letter is **Exhibit F** attached to the **Affidavit in support of the Originating Summons.**

2.14. The Claimants waited for a long period of time for the conclusion of investigation and upon our persistent

disturbance, the 1st Defendant on 4th February, 2025, about 4 months later wrote another letter, claiming that one **MRS. FELICIA ABIYE-ANGLATING**, the 2nd Defendant was written as the Next of Kin on the 1st Defendant's database and that she was contacted of the current development of the Claimants' demand as a result of the letter of Administration issued to the Claimants. **The letter is Exhibit G.**

- 2.15. The 1st Defendant vide **Exhibit G** informed the Claimants' solicitor that the 2nd Defendant acknowledged the information of issuance of Letter of Administration to them and requested to be given till **March, 2025** to reach out to some family members as she was on transit.
- 2.16. That the Claimants waited and did not hear from any of the Defendants or even the family members that they claimed that they are consulting.
- 2.17. That the 1st Defendant refused to approve for the payment to be made to the Claimants. The Claimants reached out to family members and informed them of the development while waiting for the outcome of the discussion between the Defendants. The discussion among family members did not yield any result as they said that there is not much they can do as the Claimants already have the letter of administration and the 1st Defendant did not get back to us again.
- 2.18. The Claimants after further waiting and not hearing from the defendants, caused another letter dated **11th December, 2025** through their solicitors to be served on the 1st Defendant expressing disappointment at their inability to revert back to them.
- 2.19. It is an established fact that once the letter of administration has been issued to the Claimants or anybody for that matter as administrators of the Estate of a deceased contributor, that no pension fund administrator has a discretion to

disregard it on the basis of Next of Kin. A Next of Kin is not a beneficiary in law.

2.20. The refusal by the 1st Defendant to honour the letter of Administration over the Estate of our father, **Late Mr. Angiating Ashibi Godwin** issued to the Claimants by the Probate Registrar of the High Court of Federal Capital Territory and release the pension fund to them amounts to:

- a. Disobedience of subsisting Court instrument
- b. Usurpation of probate jurisdiction and
- c. Unlawfully withholding of estate property from the Claimants.

2.21. The 1st Defendant's refusal has caused hardship, delay, and injustice to the Estate of **Late Mr. Angiating Ashibi Godwin** and to the Claimants as the Administrators.

2.22. That left with no other option, the Claimants filed this Originating Summons seeking for answers to their questions which bother strictly on law and the reliefs as contained in the summons.

2.23. The Claimants are also seeking damages for the unlawful act of the 1st Defendant.

3.0. ISSUES FOR DETERMINATION

- i. *Whether upon the death of a Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, the Pension Fund Administrator, **PREMIUM PENSION LIMITED**, is legally bound to release the pension benefits to duly appointed Administrators of the Estate of Late Ashib Godwin Angiating upon presentation of Letters of Administration.*
- ii. *Whether the nomination of the 2nd Defendant by a deceased Retirement Savings Account (RSA)*

holder, Late Ashib Godwin Angiating, overrides or excludes the Authority of Administrators appointed by competent High Court of Federal Capital Territory.

- iii. Whether the refusal of the 1st Defendant, PREMIUM PENSION LIMITED, to release the deceased's pension benefits to the Claimants despite valid Letters of Administration is unlawful, ultra vires, and contrary to the Pension Reform Act, 2014.
- iv. Whether the Claimants are entitled to an Order of this Honourable Court compelling the 1st Defendant to release the deceased's pension benefits forthwith to the Claimants.
- v. Whether the Claimants are entitled to monetary damages.

4.0. ARGUMENT ON THE QUESTIONS

4.1. ISSUE 1 & 2 (Taken Together)

- i. Whether upon the death of a Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, the Pension Fund Administrator, PREMIUM PENSION LIMITED, is legally bound to release the pension benefits to duly appointed Administrators of the Estate of Late Ashib Godwin Angiating upon presentation of Letters of Administration.
- ii. Whether the nomination of the 2nd Defendant by a deceased Retirement Savings Account (RSA) holder, Late Ashib Godwin Angiating, overrides or excludes the Authority of Administrators appointed by competent High Court of Federal Capital Territory.

Whether nomination of Next of Kin overrides Letters of Administration

4.2. My Lord, nomination under the Pension Reform Act is not a testamentary instrument. By **Sections 3 & 4 of the Pension Reform Act**, pension contributions are property of the contributor. Upon death, such property devolves to his estate.

The law is settled that:

Where a person dies intestate, all his personal property vests in his estate and can only be lawfully accessed through duly appointed Administrators.

See the cases of **Administrators of Estate of Abacha v. Eke-Spiff (2009) 7 NWLR (Pt. 1139) 97** and **Olowu v. Olowu (1985) 3 NWLR (Pt. 13) 372**.

4.3. The Claimants by **Exhibit B** are the beneficiaries of the Estate of **Late Ashib Godwin Angiating**. The 2nd and 3rd Claimants were subsequently by **Exhibit D** issued Letter of Administration over the Estate of **Late Ashib Godwin Angiating**. Notwithstanding this instrument of Law, the 1st Defendant has no deaccession to exercise. Even the **Section 4.5.1** of the **Revised Regulation on the Administration of**

the Retirement and Terminal Benefits which the 1st Defendant was clinging upon only requested the 1st Defendant to notify the person on their database and verify the information and nothing more. The said **Regulation** at **Section 4.5.1(c)** stated that:

"Where the person presented as NoK (Next of Kin) is different from the information on the PFA's database, the PFA shall contact the NoK(s)/ Legal beneficiary(ies) indicated in its database and verify the information.

4.4. The 1st Defendant by **Exhibit F** confirmed that 2nd Defendant acknowledged the information of the issuance of letter of

Administration to the Claimants but requested for time. The role played by the 1st Defendant by **Exhibit F** is even beyond the responsibility entrusted on her by the **Revised Regulation on the Administration of the Retirement and Terminal Benefits**. This is because **Section 8(2)** of the **Pension Reform Act, 2014** provides thus:

"Upon receipt of a valid Will admitted to Probate or a letter of administration confirming the beneficiaries under the estate of the deceased employee, the pension fund administrator shall with the approval of the Commission, release the amounts standing in the retirement savings account of the deceased to the personal representative of the deceased or to any other person as may be directed by a Court of competent jurisdiction, in accordance with the terms of the Will or the personal law of the deceased employee, as the case may be."

4.5. The Claimants haven't presented the Letter of Administration, the 1st Defendant has no reason, or power or authority not to honour it. This is because the refusal by the 1st Defendant to honour the Letter of Administration over the Estate of our father, **Late Mr. Angiating Ashibi Godwin** issued to the Claimants by the Probate Registrar of the High Court of Federal Capital Territory and release the pension fund to them amounts to:

- a. Disobedience of subsisting Court instrument**
- b. Usurpation of probate jurisdiction and**
- c. Unlawfully withholding of estate property from the Claimants.**

4.6. We further submit that the nomination under Pension records is purely administrative, intended to guide payment only where no dispute exists, and cannot override a Court grant.

We therefore urge this Honourable Court to resolve the two issues in favour of the Claimants.

4.7. ISSUE NO. 3

Whether the refusal of the 1st Defendant, PREMIUM PENSION LIMITED, to release the deceased's pension benefits to the Claimants despite valid Letters of Administration is unlawful, ultra vires, and contrary to the Pension Reform Act, 2014.

Whether Respondent's refusal is lawful

4.8. My Lord, we adopt the argument in support of issues 1 and 2 above and further state that **Section 8 and Section 15 of the Pension Reform Act** mandate Pension Fund Administrators to act strictly within the Act.

Nowhere does the Act empower a Pension Fund Administrator to reject Letters of Administration issued by a High Court.

As earlier stated, the 1st Defendant's action amounts to;

- a. Usurpation of judicial powers
- b. Contempt of court process
- c. Illegal withholding of estate property

The Supreme Court has warned against this exact conduct in:

CBN v. Interstella Communications Ltd [2018] 7 NWLR (Pt. 1618) 294

4.9. The 1st Defendant has no such power and we urge the Court to so hold.

4.10. The Court is therefore humbly urged to resolve this issue in favor of the Claimants.

4.11. ISSUE NO. 4

Whether the Claimants are entitled to an Order of this Honourable Court compelling the 1st Defendant to

release the deceased's pension benefits forthwith to the Claimants.

Whether Applicants are entitled to the reliefs

4.12. We adopt our argument as contained in paragraphs 4.1 - 4.11 in support of this 4th issue. Once Letters of Administration are issued, the Administrators step into the legal shoes of the deceased and therefore have the authority to administer the Estate of the Deceased. The Respondent's refusal is indefensible.

5.0. ISSUE NO. 5

Whether the Claimants are entitled to monetary damages.

5.1. My Lord, wrongful withholding of estate funds attracts damages.

5.2. Damages are awarded in deserving cases. This is clearly a deserving case. In a case of such a nature, the law presumes that damages flow naturally from the injury suffered by the victim as a result of the infraction of his rights, whether fundamental or statutory See *Abiola Vs Abacha & Ors (1998) H.R.L.R.A Pg 477@462*. Damages does not need to be proved.

5.3. The 2nd Claimant at paragraphs 36 and 37 of the Affidavit in support of the Originating Summons stated thus:

36. The 1st Defendant's refusal has caused hardship, delay, and injustice to the Estate of Late Mr. Anglating Ashibi Godwin and to the Claimants as the Administrators.

37. That because of the of the 1st Defendant to honour the Letter of Administration, the Claimants have incurred heavy expenses in terms of payment of Legal Fees to their Solicitors and sundry expenses.

5.4. We therefore urge the Court to resolve the 5th issue in favour of the Claimants and award the sum of **N500,000,000.00 (Five Hundred Million Naira)** monetary reliefs as general damages in favour of the Claimants against the 1st Defendant or such amount as the Court may deem just in the circumstance.

See the case of **Elf Petroleum v. Umah (2018) 10 NWLR (Pt. 1628) 428**

6.0. **CONCLUSION**

My Lord, this Court must not allow Pension Fund Administrators to become a law unto themselves. By granting the reliefs of the Claimants and awarding damages to the Claimants will make the 1st Defendant to sit up.

We urge Your Lordship to grant all the reliefs sought.

Dated this 19th day of January, 2026


Ifeanyi M. Nrihalike Esq.
Ogechi R. Ogbenna Esq
Collins Nnabuike Onah, Esq.
Kenekchukwu H. Okolo Esq,
Christian C. Iheka Esq
Amarachi S. Ogbu Esq
Ikechukwu Ezechukwu, SAN & Co.
No. 2 Tanga Street,
Wuse, Zone 6,
Abuja,
08036051638

FOR SERVICE ON

1. THE 1st DEFENDANT

**Premium Pension LTD,
No. 4 Awgu Close,**

Off Faskaari Crescent,
Area 3,
Garki, Abuja.

2. THE 2ND DEFENDANT

**MRS. FELICIA ABIYE ANGIATING
FEDERAL COLLEGE OF EDUCATION,
OBUDU,
CROSS-RIVER STATE.**

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

SUIT NO: _____

**IN THE MATTER OF AN APPLICATION FOR THE
INTERPRETATION AND ENFORCEMENT OF RIGHTS
ARISING FROM THE PENSION REFORM ACT, 2014**

BETWEEN

- 1. DR. GREG UKEL ANGIATING**
- 2. MR. GIFT UNIMKE ANGIATING**
- 3. MISS PRISCA BIWOM ANGIATING - CLAIMANTS**

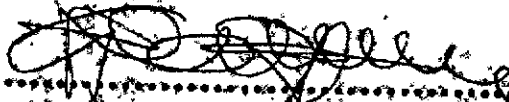
*(Suing as the Administrator of the
Estate of late Ashib Godwin Angiating)*

AND

- 1. PREMIUM PENSION LIMITED - DEFENDANTS**
- 2. MRS. FELICIA ABIYE-ANGIATING**

PRE-ACTION COUNSELING CERTIFICATE

I, **IFEANYI M. NRIALIKE, ESQ.** Legal Practitioner/
Counsel to the Claimants have gone through the facts of
this case and have appropriately counseled the Claimants
on the relative strength of his case or otherwise and should
this case turn out to be frivolous, I am prepared to be liable
as per the provisions of the rules of this Court.


.....
IFEANYI M. NRIALIKE, ESQ.
Applicant's Counsel


.....
3rd Claimant