

15/04/2024
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IN THE FEDERAL HIGH COURT OF NIGERIA
IN THE ABUJA JUDICIAL DIVISION
HOLDEN AT ABUJA

SUIT: FHC/ABJ/CS/1113/2021

BETWEEN

ENAIRA PAYMENT SOULTIONS LIMITED PLAINTIFF

AND

- 1. CENTRAL BANK OF NIGERIA
- 2. THE REGISTRAR OF TRADEMARKS
- 3. THE REGISTRAR GENERAL CORPORATE AFFAIRS COMMISSION

FEDERAL HIGH COURT
ABUJA
DEFENDANTS
13 MAY 2024
PAID
Sign:.....

AMENDED WRIT OF SUMMONS

11104563449

TO:

- 1. CENTRAL BANK OF NIGERIA, CBN Headquarters, Central Area, Abuja.
- 2. THE REGISTRAR OF TRADEMARKS, OLD SECRETARIAT, AREA 1, GARKI, ABUJA
- 3. THE REGISTRAR GENERAL CORPORATE AFFAIRS COMMISSION, Plot 480, Tigris Crescent, Off Aguiyi Ironsi Street, Maitama, Abuja

You are hereby commanded that within thirty (30) days after the service of this writ on you, inclusive of the day of such service, you do cause an appearance to be entered for you in an action at the suit of ENAIRA PAYMENT SOULTIONS LIMITED and TAKE NOTICE that in default of your so doing, the Plaintiff may proceed therein, and judgment may be given in your absence.

Dated this 05 day of APRIL 2024

BY ORDER OF COURT

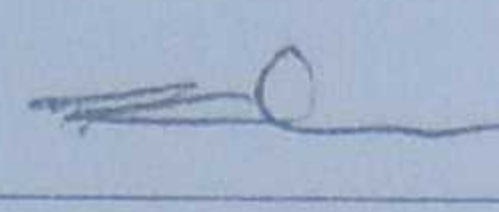
FEDERAL HIGH COURT
ABUJA
05 APR 2024
PAID
Sign:.....

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ABUJA
13/5/24~~

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FLO	-	200.00
SLO	-	100
SIM	-	100
WTS	-	100
PL	-	100

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 05/04/24
REGISTRAR

MEMORANDUM TO BE SUBSCRIBED ON THE WRIT

N.B: This writ is to be served within twelve calendar months from the date thereof, or if renewed, within six calendar months from the date of the last renewal, including the day of such date and not afterwards. The Defendant(s) may enter appearance personally or by legal practitioner either by handing in the appropriate forms duly completed, at the Registry of the Federal High Court Abuja Judicial division in which the action is brought or by sending them to the Registrar by registered posts.

ENDORSEMENT TO BE MADE ON THE WRIT BEFORE ISSUE THEREOF

WHEREOF, the Plaintiff claims against the Defendants jointly as follows:

1. A **DECLARATION** that the 1st Defendant willfully violated the Plaintiff's trade name and infringed the Plaintiff's trademark "eNaira" in class 36 with Registration number: NG/TM/O/2021/39730 and in class 42 with Registration number: NG/TM/O/2021/39732 by engaging in the usage, exploitation, and appropriation of the name "eNaira" as its digital currency name without the consent or authorization of the Plaintiff.
2. A **DECLARATION** that the actions of the 1st Defendant in accepting the ex parte ruling of September 30, 2021, without complying with the order to "launch and compensate thereafter" is a violation of a court order.
3. A **DECLARATION** that the 1st Defendant has no priority rights and cannot continue to claim the name eNaira in any form anywhere as that violates the Plaintiff's corporate name and mark, and constitutes an unconstitutional forceful takeover of the Plaintiff's personal property.
4. A **DECLARATION** that the actions of the 1st Defendant in announcing and launching eNaira as a digital currency on October 25, 2021, and its continuous use, as objective evidence anywhere without making efforts to compensate the

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ABUJA
13/5/24

Plaintiff violates Plaintiff's constitutional rights to personal property and is void and of no effect.

- 5. A **DECLARATION** that the name of the Plaintiff "Enaira Payment Solutions Ltd" is not in violation of the provisions of the Companies and Allied Matters Act as the name of the Plaintiff has gained substantial goodwill over the past 20 years.
- 6. A **DECLARATION** that the matter before this court concerns passing off by the 1st Defendant of Plaintiff's corporate name and mark, rather than blackmail by the Plaintiff, as implied in the letter submitted by the 1st Defendant with Ref: LSD/BCL/CON/USP/001/001 to the USPTO.
- 7. A **DECLARATION** that eNaira is not recognized by the Constitution or any enactment by the National Assembly as Nigeria's national/sovereign asset, central bank digital currency, or legal tender and, therefore, it is registrable as already demonstrated by the 2nd Defendant.
- 8. **AN ORDER** setting aside the 2nd Defendant's purported withdrawal of the Plaintiff's acceptance and acknowledgment letters issued with respect to the Plaintiff's eNaira Trademark application in class 36 with Registration Number: NG/TM/O/2021/39730 and eNaira Trademark application in class 42 with Registration Number NG/TM/O/2021/39732.
- 9. **AN ORDER** directing the 2nd Defendant to advertise Plaintiff's eNaira Trademark application in class 36 with Registration Number: NG/TM/O/2021/39730 and eNaira Trademark application in class 42 with Registration Number NG/TM/O/2021/39732 in the Trademarks Journal.
- 10. **AN ORDER OF PERPETUAL INJUNCTION** restraining the 1st Defendant, either by themselves or acting through agents, agencies, servants, corporations, ministries, parastatals, locals such as Gluwa, foreign organizations such as the USPTO, White and Case LLP, etc., or through any person or persons (natural or artificial), from continuing to parade, use, or otherwise willfully infringing both formerly and informally the Plaintiff's "eNaira" in any form.
- 11. **AN ORDER OF PERPETUAL INJUNCTION** restraining the 1st Defendant, either by themselves or acting through agents, agencies, servants, corporations, ministries, parastatals, locals such as Gluwa, and foreign organizations such as the USPTO, White and Case LLP, etc., or through any person or persons (natural or artificial), from claiming or conferring ownership of the name eNaira in any form on the 1st Defendant, and opposing Plaintiff's "eNaira" trademark registration with the Office of the 2nd Defendant.

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12. **AN ORDER** voiding the eNaira Trademark Certificates issued by the 2nd Defendant to the 1st Defendant.

13. **AN ORDER OF PERPETUAL INJUNCTION** restraining the 3rd Defendant from delisting or altering the name of the Plaintiff from the record of the 3rd Defendant.

14. The sum of N20,000,000,000.00 (Twenty Billion Naira Only) as general damages.

15. The sum of N50,000,000,000.00 (Fifty Billion Naira) as special damages.

IN ADDITION TO PRAYERS 1 TO 15 ABOVE

16. For an Order directing the 1st Defendant to pay to the Plaintiff the sum of N20,000,000,000,000 (Twenty Billion Naira) only as compensation for the loss of the Plaintiff's right to the name "ENaira Payment Solutions Ltd".

17. The sum of N10,000,000.00 (Ten Million Naira) Only, being the cost of this action.

The writ was issued by **DR. OBINNA ONYA** of Dr. Onyechi Ikpeazu & Co. whose address for service is Plot 10, Block IX, David Dodo Street, Gwarinpa, Abuja Legal Practitioner for the Plaintiff whose address is Suite 2, No. 29A, Ndjamena Crescent, Off Aminu Kano Crescent, Abuja.

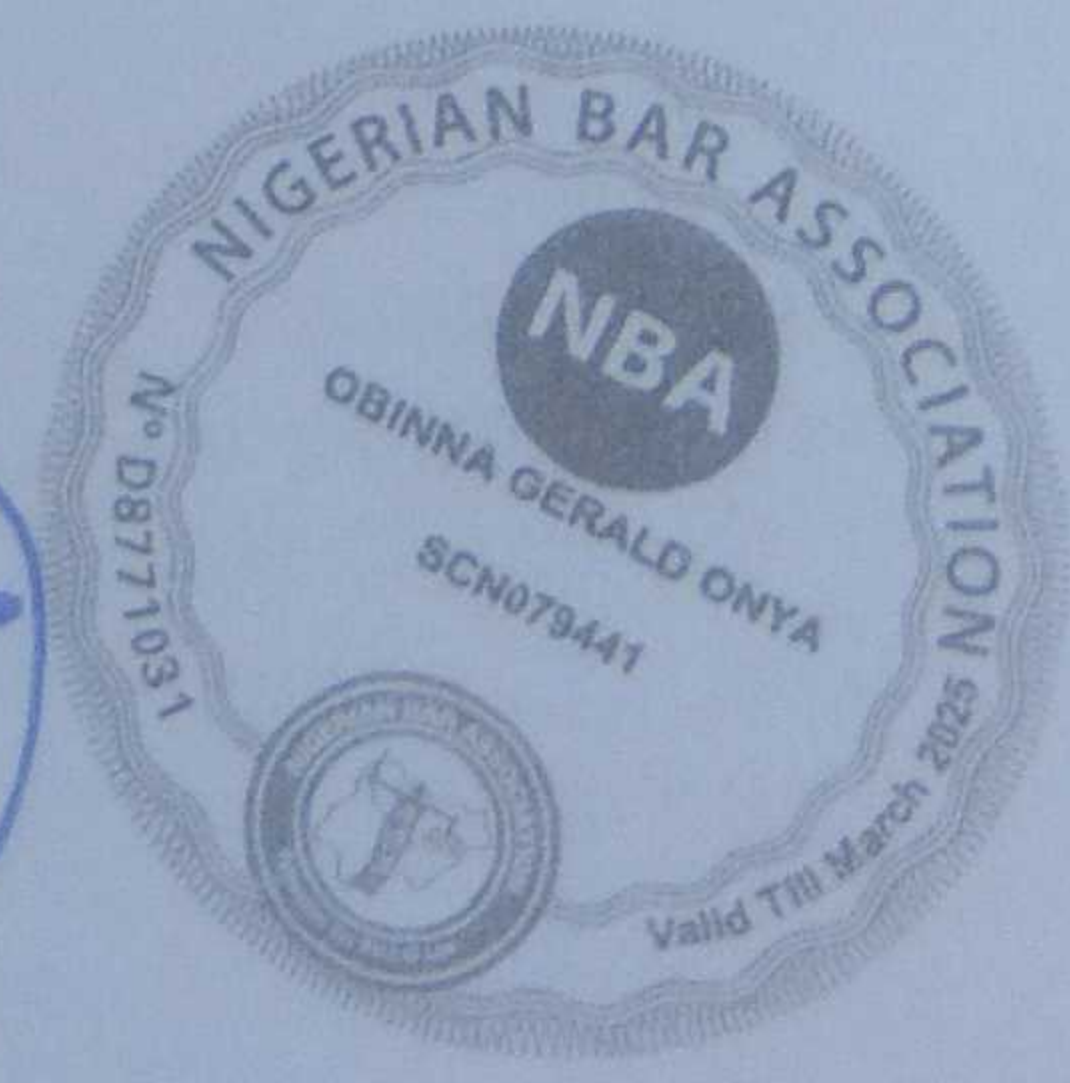
ENDORSEMENT TO BE MADE ON THE WRIT FORTH WITH AFTER SERVICE

This writ was served by me at.....day of.....on the Defendants on the.....2024.

Signed.....

Address.....

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ABUJA
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FOR SERVICE ON;

1ST DEFENDANT

C/O THEIR SOLICITOR
D.D DODO & CO
OMAPLEX LAW FIRM
10 ATBARA STREET
OFF CAIRO STREET
WUSE II, ABUJA

2ND DEFENDANT

THE REGISTRAR OF TRADEMARKS
OLD SECRETARIAT
AREA 1, GARKI
ABUJA

3RD DEFENDANT

THE REGISTRAR GENERAL
CORPORATE AFFAIRS COMMISSION
Plot 480, Tigris Crescent,
Off Aguiyi Ironsi Street,
Maitama, Abuja

A/w
s/c
2 O/F
L/w
L/D
Service

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FEDERAL HIGH COURT
ABUJA
13/5/24

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05/04/2024
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HOLDEN AT ABUJA

SUIT NO: FHC/ABJ/CS/1113/2021

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ENAIRA PAYMENT SOLUTIONS LIMITED

PLAINTIFF

AND

- 1. CENTRAL BANK OF NIGERIA
- 2. THE REGISTRAR OF TRADEMARKS.
- 3. THE REGISTRAR GENERAL
CORPORATE AFFAIRS COMMISSION

DEFENDANTS

AMENDED STATEMENT OF CLAIM

1. The Plaintiff is a limited liability company incorporated under the laws of the Federal Republic of Nigeria on the 7th of April, 2004 with RC No. 508500. The Plaintiff has its principal place of business at Suite 2, No. 29A, Ndjamena Crescent, off Aminu Kano Crescent, Wuse 2, Abuja.
2. The 1st Defendant is a statutory corporation established by an Act in 1958, having offices in most States in the Federation of Nigeria, including its Head Office at Balewa Way, Central Business District, Cadastral Zone, Abuja, and Federal Capital Territory.
3. The 2nd Defendant is the registrar of trademarks, the Officer appointed to exercise functions relating to Trademarks Registration in Nigeria.
4. The 3rd Defendant is the Registrar-General of Corporate Affairs Commission, responsible for the regulation of corporate organizations in Nigeria.

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5. The Plaintiff, which had existed by the corporate name, "eNaira Payment Solutions Limited" since 2004, has at all times material to the facts of this case been the registered proprietor of the name, 'eNaira' after its application for eNaira Trademark registration in class 36 was accepted with File Number: NG/TM/O/2021/39730, with respect to insurance, financial affairs, monetary affairs, and estate affairs. **The Plaintiff's Certificate of Incorporation and Acceptance of Trademark Registration under class 36 is hereby pleaded and shall be relied on during trial.**

6. The Plaintiff was at all material times, the registered proprietor of the name, 'eNaira' by which its application for eNaira Trademark registration in class 42 was acknowledged and accepted with Trademark Registration Number: NG/TM/O/2021/39732 with respect to scientific and technology service, design, and development of computers, hardware, and software. **The acknowledgment of the Trademark Registration under class 42 shall be presented as evidence during the trial of this suit.**

7. Plaintiff's eNaira trademark applications, having been accepted and acknowledged by the 2nd Defendant, is valid, subsisting, and cannot be withdrawn or refused publication and/or registration by the 2nd Defendant except by successful opposition, and after trademark examination has been completed.

8. The Plaintiff, being the proprietor of eNaira and having been in commercial use of its name since 2004 and willing to expand its business on a global scale, launched its website "www.enairacurrency.ng", hosting Plaintiff's electronic payment portal which is established as an algorithmically controlled digital non-fiat currency in Nigerian Naira to provide a more transparent, theft-free, quick, efficient, reliable virtual system than fiat Naira currency, i.e., an alternative to the physical Naira currency. **The Plaintiff shall rely upon printouts of its business website and shall be presented as evidence during the trial of this suit.**

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9. The 1st Defendant veiled in malice has, on several occasions after the launch of Plaintiff's website, and while in the course of this suit orchestrated a cacophony of cyber-attacks upon the Plaintiff's digital website by pulling it down and suspending its operations from the host backend and making it inaccessible to users online. **The Plaintiff will rely upon printouts of the suspended website and shall be presented as evidence during the trial of this suit.**

10. The 1st Defendant, in the course of this suit, sought to destroy Plaintiff's ambition, demanded the Plaintiff's status from the 3rd Defendant in a letter dated September 28, 2021, with Ref: LSD/BCL/CON/CAC/1/010 which was responded to by the 3rd Defendant in a letter dated October 6, 2021, with Ref: RGO/SU/VOL.8/2021/0610. **The 1st Defendant is hereby put on notice to produce the original copies of the said letters of September 28, 2021 and October 6, 2021, and shall be presented as evidence during the trial of this suit.**

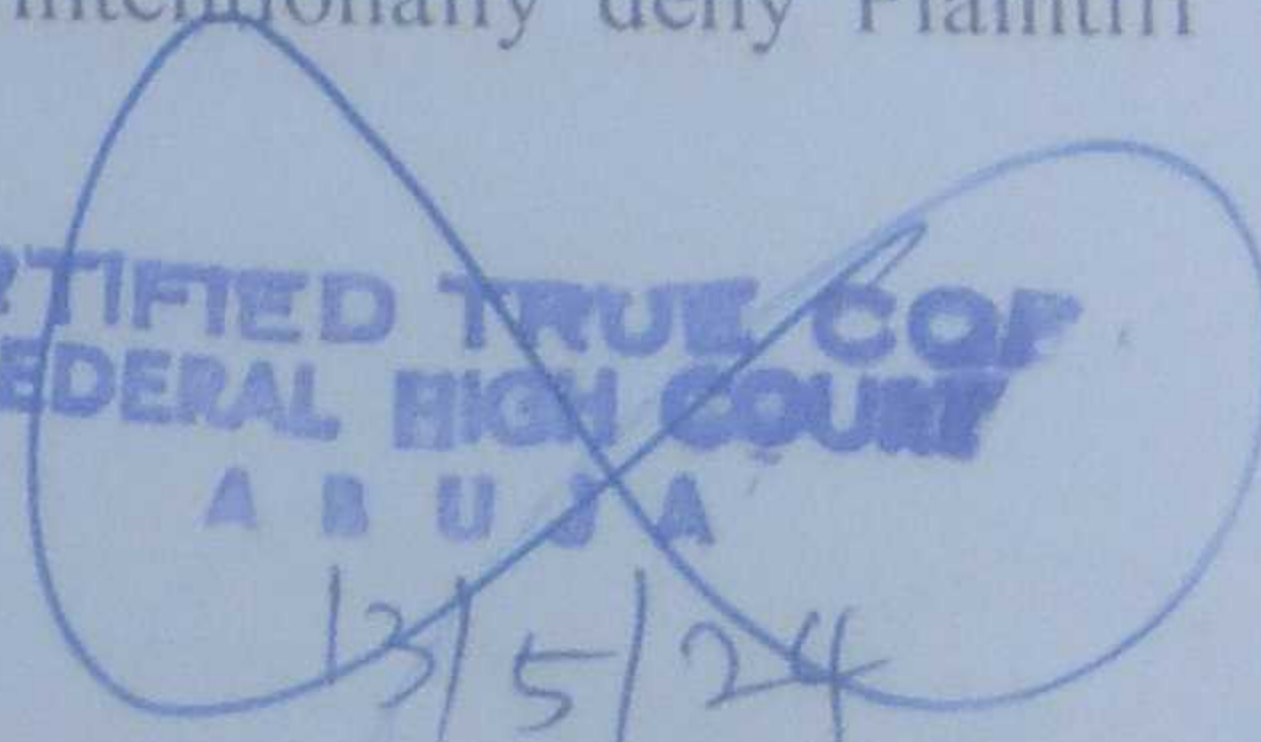
11. The 3rd Defendant on October 4, 2021, wrote the Plaintiff instructing it to change its company name, and in a subsequent letter dated December 9, 2021, with Ref: Com/GCE/QU/Vol.1/2021/322A threatened sanctions, by threatening the Plaintiff, the 3rd Defendant sought to erode the foundation of justice, attempting to erase the Plaintiff's name from the annals of its records. The Plaintiff shall rely upon a copy of the said letter at the trial of this Suit. **The 3rd Defendant is hereby put on notice to produce the original copies of the said letters of October 4, 2021, December 9, 2021, and they shall be presented as evidence during the trial of this suit.**

12. Despite the pendency of this Suit, and after the Plaintiff's eNaira Trademark Applications in class 36 and 42 had been accepted, assigned a registration number, and even used as evidence before this Honorable Court, on October 30, 2021, and November 1, 2021 respectively, the 1st Defendant maliciously applied for eNaira Trademark in the same class 36 and 42 as the Plaintiff, and then also in class 34 among other classes from the office of the 2nd Defendant and was granted both acceptance and registration certificates. The Plaintiff shall rely upon a copy of the

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trademark certificate issued to the 1st Defendant in class 36 at the trial of this Suit. **The 1st Defendant is hereby put on notice to produce all the acceptances and trademark certificates granted it by the 2nd Defendant and shall be presented as evidence during the trial of this suit.**

- 13. The 2nd Defendant, realizing that the Plaintiff has already been granted acceptance and acknowledgment letter by the 2nd Defendant's office in class 36 with File Number: NG/TM/O/2021/39730 and 42 with Trademark Registration Number: NG/TM/O/2021/39732 respectively, wanting to justify the new concurrent acceptance granted to the 1st Defendant wrote a purported letter of withdrawal of Plaintiff's trademarks Applications in classes 36 and 42, maliciously claiming that "Naira" [not eNaira] is a National Intellectual Property Asset of the Federal Republic of Nigeria and therefore a National Symbol, The 2nd Defendant also noted that National Assets are not registrable.
- 14. The 2nd Defendant swayed by plotting of deceit, succumbed to the allure of betrayal, forsaking its sacred duty in favor of expediency, proceeded by a letter dated 15th November 2021, to withdraw and cancel Plaintiff's Application with Trademark Registration Number: NG/TM/O/2021/39730 in class 36 and Trademark Registration Number: NG/TM/O/2021/39732 respectively. The Plaintiff shall rely upon a copy of the said letter at the trial of this Suit. **The 2nd Defendant is hereby put on notice to produce the original copy of the letter and shall be presented as evidence during the trial of this suit.**
- 15. The 2nd Defendant, in its purported letter of 15th November 2021, to the Plaintiff, having failed to state the error and disclose a justifiable reason for canceling Plaintiff's eNaira trademark acceptance and acknowledgment in classes 36 and 42, further shows wrong motive and a hidden agenda to intentionally deny Plaintiff registration of its trade name as its trademark also.


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- 16. The 2nd Defendant, on 18th November 2021, three days after the purported withdrawal of Plaintiff's application in classes 36 and 42, revealed its hidden agenda by publishing in an online trademark journal the eNaira trademark registrations meant for the Plaintiff in favor of the 1st Defendant in many services and classes including *Tobacco and Cigarettes* in class 34, *Insurance and Financial Affairs* in class 36, and *Scientific and Technology Service* in class 42.
- 17. That the Defendants acted together to rob the Plaintiff of its priority right, eNaira name under common law, and also deny it its federal law right to trademark its name. The Plaintiff shall rely upon a copy of an online news publication showing the eNaira Registration number in class 34 belonging to the 1st Defendant at the trial of this Suit. **The 2nd Defendant is hereby put on notice to produce the original hard copy of the Nigerian online trademark journal of November 18, 2021, Vol. 1, No 6, and shall be presented as evidence during the trial of this Suit.**
- 18. The 1st Defendant has in many communications lied and deceived this Court and public officers when in its statement of Defense and Counterclaim stated that there is no trademark registered by the Trademark Office consisting of the name eNaira in class 36, 42, or any class at all, either by the plaintiff or any person at all since it's not registrable, when at that material time had already gone ahead with its registration was already in possession of the eNaira trademark in class 36 and many other classes, thereby by violating an equitable principle of good faith.
- 19. The Defendants have in violation of court order, continued to infringe on Plaintiff's eNaira, Plaintiff shall rely on several online publications showing the 1st Defendant's continued infringement of the Plaintiff's trademark, and unless restrained and stopped by this Honourable Court, will continue the infringement.

PARTICULARS OF DECEIT, VIOLATION, AND INFRINGEMENT

- i. Through advertisements on television and social media channels.

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- ii. The 1st Defendant, during the course of this suit, has entered into partnerships and caused many other corporate bodies, including commercial banks, fintech companies, and JAMB, to infringe on the Plaintiff's eNaira mark. That while this suit is pending, the Plaintiff is unable to exercise its rights due to ongoing litigation concerning its trade name, the 1st Defendant partnered with a private entity called the African Stablecoin Consortium (ASC), operating eNGN as another digital currency, thereby replicating the Plaintiff's services.
- iii. The 2nd Defendant acting in concert with the 1st Defendant, purported to cancel the Plaintiff's eNaira Acceptance Letter, allowing the 1st Defendant to apply for and obtain the same mark.
- iv. The 1st Defendant recently entered into this partnership with African Stablecoin Consortium (ASC), the company registered in 2022 when the Special Investigator Jim Obazee appointed by H.E, President Tinubu in July 2023 submitted its Report allegedly calling 1st Defendant's eNaira implementation fraudulent, a kind of presidential indictment of 1st Defendant while this matter was pending.
- v. That there is no basis or legislative approval for the 1st Defendant to operate two digital currency platforms simultaneously.
- vi. The 1st Defendant, by letter dated 21st January 2022 with Ref: LSD/BCL/CON/USP/001/001 approached the United States Patent and Trademark Office (USPTO), claiming that eNaira is Nigeria's "sovereign/national asset," which cannot be registered by anyone, anywhere in the world and that the Plaintiff's filed this case to blackmail it. This action was taken despite the 1st Defendant having applied for and granted the same mark by the 2nd Defendant in many classes. The Plaintiff shall rely upon a copy of the said letter at the trial of this Suit. The 1st Defendant is hereby put on notice

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to produce the original copy of the said letter and shall be presented as evidence during the trial of this Suit.

- vii. That the official currency name and legal tender of Nigeria is Nigerian Naira (NGN) and not "Naira", as the word "Naira" simpliciter, finds its origins in a village within Srikakulam District, Andhra Pradesh State, India, and carries a geographic descriptor, it cannot be tied to Nigeria. The Plaintiff finds it deceptive that the 1st Defendant persists in referring to the Nigerian currency as "Naira" instead of its official name, the Nigerian Naira. The Plaintiff shall rely upon a copy of online news publications of March 5, 2024 from eyeway.ng.
 - viii. The Plaintiff asserts that this persistent misrepresentation of Nigeria's currency amounts to willful misrepresentation.
 - ix. That 1st Defendant, in accepting the ex parte order of Hon Justice Taiwo Taiwo, without fully fulfilling its content, 1st Defendant continues to infringe on the Plaintiff's trademark while the case remains pending.
 - x. The 1st and 3rd Defendants are desirous to permanently remove Plaintiff's right to use its corporate name and mark "eNaira" while the 1st Defendant moved Plaintiff's clients to its own business website.
 - xi. The 1st Defendant's act of advertising, launching, and continuously operating its digital currency under the name eNaira disregards the Plaintiff's priority right over the name eNaira, violates the Plaintiff's business name and mark, and constitutes a forceful takeover of the Plaintiff's personal property.
20. The Plaintiff instructed its Solicitor, the law firm of Olakunle Agbebi & Co., to write to the 1st Defendant to cease and desist from passing off its name and infringing on its mark before filing this suit. **The Plaintiff's Solicitor's letter dated September 20, 2021, shall be relied upon.**

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- 21. The 2nd Defendant, while this suit is pending and issues have been joined with the 1st Defendant, acted in complete contempt and disregard of the court by issuing a letter dated November 15, 2021, purportedly withdrawing the Plaintiff's eNaira Trademark application in class 36 with Registration Number: NG/TM/O/2021/39730 and eNaira Trademark application in class 42 with Registration Number NG/TM/O/2021/39732, without explaining the error.
- 22. The 1st Defendant, in obstinacy, continued with the infringement of the Plaintiff's trademark, including advertising globally, partnering with various corporate bodies and fintech companies, and colluding with the 2nd Defendant to acquire the Plaintiff's eNaira mark in various classes while ensuring the Plaintiff's business website platform remains inactive.
- 23. The name of the Plaintiff is not in violation of the provisions of the Companies and Allied Matters Act as the name of the Plaintiff has gained substantial goodwill and the trust of the general public and its clients over the past 20 years, and the Plaintiff has regularly filed its annual returns and fulfilled all its obligations to the 3rd Defendant till date.
- 24. That the Defendants cannot expropriate the rights of the Plaintiff without adequately compensating the Plaintiff for the loss of their personal property.
- 25. Unless the 1st Defendant is restrained and stopped, it will continue its ongoing violation and infringement of the Plaintiff's corporate name and Trademark "eNaira" in class 36 with Registration number: NG/TM/O/2021/39730 and in class 42 with Registration number: NG/TM/O/2021/39732.
- 26. At the trial, the Plaintiff shall rely on the following documents:
 - i. Plaintiff's Certificate of incorporation
 - ii. Acceptance of trademark Registration under class 36.
 - iii. Acknowledgment of Trademark registration under class 42.

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- iv. printouts of Plaintiff's business website
- v. Printouts of the Plaintiff's suspended website
- vi. 3rd Defendant's letter to the Plaintiff dated 9th December 2021.
- vii. 1st Defendant's Certificate of Registration of Trademark with Certificate number 013103 sealed on 29th March 2023
- viii. 2nd Defendant's Letter to the Plaintiff dated 15th November 2021.
- ix. Inside Business Online publications published 13th February, 2024
- x. BusinessDay Online Publication dated 10th January, 2023
- xi. Naira Metrics Online Publication dated 7th March, 2024
- xii. 1st Defendant's letter with Ref: LSD/BCL/CON/USP/001/001 21st January, 2022.
- xiii. Eyeway Publication dated 5th March 2024
- xiv. Plaintiff's Solicitor's letter to 1st Defendant dated 20th September 2021.

27. WHEREOF, the Plaintiff claims against the Defendants jointly as follows:

1. A **DECLARATION** that the 1st Defendant willfully violated the Plaintiff's trade name and infringed the Plaintiff's trademark "eNaira" in class 36 with Registration number: NG/TM/O/2021/39730 and in class 42 with Registration number: NG/TM/O/2021/39732 by engaging in the usage, exploitation, and appropriation of the name "eNaira" as its digital currency name without the consent or authorization of the Plaintiff.
2. A **DECLARATION** that the actions of the 1st Defendant in accepting the ex parte ruling of September 30, 2021, without complying with the order to "launch and compensate thereafter" is a violation of a court order.
3. A **DECLARATION** that the 1st Defendant has no priority rights and cannot continue to claim the name eNaira in any form anywhere as that violates the Plaintiff's corporate name and mark, and constitutes an unconstitutional forceful takeover of the Plaintiff's personal property.

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4. **A DECLARATION** that the actions of the 1st Defendant in announcing and launching eNaira as a digital currency on October 25, 2021, and its continuous use, as objective evidence anywhere without making efforts to compensate the Plaintiff violates Plaintiff's constitutional rights to personal property and is void and of no effect.
5. **A DECLARATION** that the name of the Plaintiff "Enaira Payment Solutions Ltd" is not in violation of the provisions of the Companies and Allied Matters Act as the name of the Plaintiff has gained substantial goodwill over the past 20 years.
6. **A DECALRATION** that the matter before this court concerns passing off by the 1st Defendant of Plaintiff's corporate name and mark, rather than blackmail by the Plaintiff, as implied in the letter submitted by the 1st Defendant with Ref: LSD/BCL/CON/USP/001/001 to the USPTO.
7. **A DECLARATION** that eNaira is not recognized by the Constitution or any enactment by the National Assembly as Nigeria's national/sovereign asset, central bank digital currency, or legal tender and, therefore, it is registrable as already demonstrated by the 2nd Defendant.
8. **AN ORDER** setting aside the 2nd Defendant's purported withdrawal of the Plaintiff's acceptance and acknowledgment letters issued with respect to the Plaintiff's eNaira Trademark application in class 36 with Registration Number: NG/TM/O/2021/39730 and eNaira Trademark application in class 42 with Registration Number NG/TM/O/2021/39732.
9. **AN ORDER** directing the 2nd Defendant to advertise Plaintiff's eNaira Trademark application in class 36 with Registration Number: NG/TM/O/2021/39730 and eNaira Trademark application in class 42 with Registration Number NG/TM/O/2021/39732 in the Trademarks Journal.
10. **AN ORDER OF PERPETUAL INJUNCTION** restraining the 1st Defendant, either by themselves or acting through agents, agencies, servants, corporations, ministries, parastatals, locals such as Gluwa, foreign organizations such as the USPTO, White and Case LLP, etc., or through any person or persons (natural or artificial), from continuing to parade, use, or otherwise willfully infringing both formerly and informally the Plaintiff's "eNaira" in any form.

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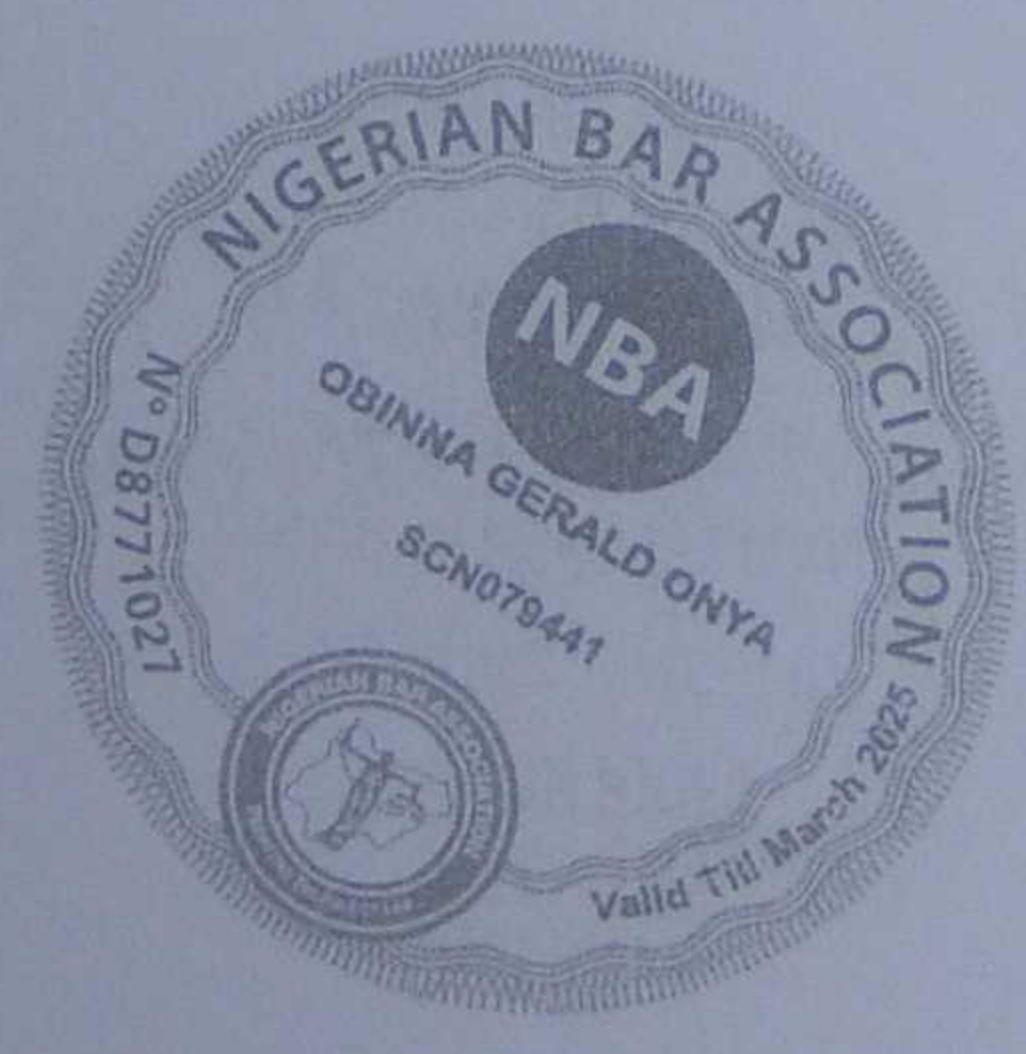
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- 12. **AN ORDER** voiding the eNaira Trademark Certificates issued by the 2nd Defendant to the 1st Defendant.
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- 14. The sum of N20,000,000,000.00 (Twenty Billion Naira Only) as general damages.
- 15. The sum of N50,000,000,000.00 (Fifty Billion Naira) as special damages.

IN ADDITION TO PRAYERS 1 TO 15 ABOVE

- 16. For an Order directing the 1st Defendant to pay to the Plaintiff the sum of N20,000,000,000,000 (Twenty Billion Naira) only as compensation for the loss of the Plaintiff's right to the name "ENaira Payment Solutions Ltd".
- 17. The sum of N10,000,000.00 (Ten Million Naira) Only, being the cost of this action.

DATED THIS 4th DAY OF April, 2024.

DR. ONYECHI IKPEAZU OON, SAN, FCARB
 ✓ DR. OBINNA ONYA MCI Arb (UK)
 JULIUS MBA ESO
 A.A AKAAHS ESQ
 EMEKA CHINWUBA ESO
 DAVID ITYONYIMAN ESQ
 VINCENT AGBATA ESQ
 JENNIFER ANYAEJI ESQ



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ABUJA
 13/5/24

ROSELYN OGBONNIA ESQ.,
IKPEAZU CHAMBERS
Plaintiff's Solicitors & counsel
Whose address for service is:
Plot 10, Block IX David Dodo Street,
(Last house on the left)
Off Wole Soyinka Avenue,
Gwarimpa, Abuja
08160119512

SERVICE ON:

1ST DEFENDANT

C/O THEIR SOLICITOR
D.D DODO & CO
OMAPLEX LAW FIRM
10 ATBARA STREET
OFF CAIRO STREET
WUSE II, ABUJA

2ND DEFENDANT

THE REGISTRAR OF TRADEMARKS
OLD SECRETARIAT
AREA 1, GARKI
ABUJA

3RD DEFENDANT

THE REGISTRAR GENERAL
CORPORATE AFFAIRS
COMMISSION
420, TIGRIS CRESCENT, OFF AGUIYI
IRONSI STREET, MAITAMA, ABUJA.

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