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Filed on 22/12/2015
at 1:00 am/pm
Registrar
SUPREME COURT OF GHANA

IN THE SUPERIOR COURT OF JUDICATURE
IN THE SUPREME COURT OF JUSTICE
ACCRA AD 2015

WRIT TO INVOKE THE ORIGINAL JURISDICTION
OF THE SUPREME COURT

BETWEEN:

SUIT NO:
J1/2/2015

ABDULAI YUSIF FANASH MUHAMMED
BL 1- L166, ZONGO, HOHOE

PLAINTIFF

VRS

- | | |
|------------------------------------------------------------------------------------|---------------------------|
| 1. THE ATTORNEY GENERAL ATTORNEY GENERAL'S CHAMBERS MINISTRIES, ACCRA | 1 ST DEFENDANT |
| 2. ALFRED AGBESI WOYOME HOUSE No. 327/7 COMCAN CRESCENT, KOKOMLEMLE ACCRA | 2 ND DEFENDANT |
| 3. MARTIN ALAMISI AMIDU PLOT 355, NORTH LEGON RESIDENTIAL AREA, ACCRA | 3 RD DEFENDANT |

IN THE NAME OF THE REPUBLIC OF GHANA you are hereby
commanded within fourteen days after the service on you of the
statement of the Plaintiff's case inclusive of the day of service, that you
are to file or cause to be filed for you a statement of the defendant's case
in an action at the suit of:

Abdulai Yusif Fanash Muhammed
BL 1-L166,Zongo, Hohoe

1122443
20/12/2015

The nature of the relief sought is as follows:

1. A declaration that the financial engineering claims by Alfred Agbesi Woyome arising out of the tender bid by Vamed Engineering GmbH/Waterville Holdings during the procurement process from June 2005 until its wrongful abrogation in August 2005 is not an international business transaction within the meaning of article 181 of the Constitution, 1992.
2. A declaration that on a true and proper interpretation of article 2(1), article 130 and article 181 of the Constitution, 1992 the Supreme Court has no jurisdiction to pronounce on the financial engineering claims between a citizen of Ghana and the Government of Ghana which does not fall within the ambit or purview of article 181.
3. A declaration that the review decision of the Supreme Court in Suit No. J7/10/2013 intitled *Martin Alamisi Amidu v The Attorney General, Waterville Holdings (BVI) Limited and Alfred Agbesi Woyome* dated 29th July 2014 is wrong in law for excess of jurisdiction as same was obtained in violation of the Constitution, 1992.
4. A declaration that the consequential orders in Suit No. J7/10/2013 intitled *Martin Alamisi Amidu v The Attorney General, Waterville Holdings (BVI) Limited and Alfred Agbesi Woyome* dated 29th July 2014 given in the review decision by the same Court are wrong in law, null and void *ab initio* and accordingly ought to be set aside in exercise of the powers of this Honourable Court to set aside its own void judgments.

The capacity in which the plaintiff is bringing the action is as follows:

The Constitution, 1992, article 2(1)(b) and article 130(1)(a); the Supreme Court Rules, 1996 (C. I. 16) rule 45.

The address for service of the Plaintiff is as follows:

Abdulai Yusif Fanash Muhammed
BL-1 L166, Zongo, Hohoe.

The address for service of Counsel for the Plaintiff is as follows:

Kwasi Afrifa, Esq.
O & A Legal Consult
H/No. NTER 301,
Amakom-Kumasi.

The names and addresses of persons affected by this writ are as follows:

1. The Attorney General
Attorney General's Chambers
Ministries, Accra.
2. Alfred Agbesi Woyome
House No. 327/7
Comcan Crescent, Kokomlemle
Accra
3. Martin Alamisi Amidu
Plot 355, North Legon
Residential Area, Accra.

Dated in Accra this ^{21st} day of December 2015

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KWASI AFRIFA
Solicitor for the Plaintiff
Solicitor's Licence No. AR09898/15
O & A Legal Consult
Chambers Registration No. PP0001195/14/15

LEGAL CONSULT
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