

J. H. T. KAMU H/D 13/11/25  
IN THE HIGH COURT OF JUSTICE OF KWARA STATE

IN THE ILORIN JUDICIAL DIVISION

HOLDEN AT ILORIN

SUIT NO: KWS/518/2025

BETWEEN

1. ZEINAB ZULU GAMBARI
2. HASSIAT WURAOLA GAMBARI
3. MARIAM SEGILOLA GAMBARI
4. HAUWA ADEGBOYEGA GAMBARI
5. BILKISU TINUOLA GAMBARI
6. ALIYU OLADIPOPU GAMBARI
7. RAKIYA AJIBOLA GAMBARI.....CLAIMANTS

AND

1. AHMED BOLAKALE GAMBARI
2. UNKNOWN PERSONS.....DEFENDANTS

WRIT OF SUMMONS

TO THE DEFENDANTS:

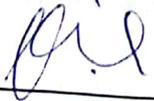
1. AHMED BOLAKALE GAMBARI, Emir's Palace, Ilorin, Kwara State.
2. UNKNOWN PERSONS, Emir of Ilorin House, Murtala Mohammed Way, Ilorin, Kwara State.

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 this action at the suit of the Claimants.

TAKE NOTICE that in default of your so doing, judgment may be given in your absence.

DATED THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2025.

BY ORDER OF COURT

  
Registrar

NOTE: This Writ shall be served within six (6) calendar months from the date thereof or, if renewed, within three (3) months from the last renewal, including the day of such renewal.

### ENDORSEMENT ON WRIT

The Claimants' claims against the Defendants are as follows:

1. **A DECLARATION** that the purported lease of the property known as Matchco (Ile Isana), situate at Emir of Ilorin House, Murtala Mohammed Way, Ilorin, Kwara State, being the property of the late HRH Alh. (Dr.) Zulkarnaini Gambari Mohammed, entered into by the 1st Defendant and the 2nd Defendant, is void, illegal, ultra vires, invalid, null and of no legal effect.
2. **AN ORDER** setting aside and withdrawing the authority previously granted to the 1st Defendant under the Letter of Administration issued by this Honourable Court as one of the Administrators of the estate of HRH Alh. (Dr.) Zulkarnaini Gambari Mohammed.
3. **AN ORDER** of this Honourable Court directing the remaining three Administrators named in the said Letter of Administration to proceed forthwith to distribute the estate of the late HRH Alh. (Dr.) Zulkarnaini Gambari Mohammed among his lawful heirs in accordance with law.
4. **A PERPETUAL INJUNCTION** restraining the 2nd Defendant, their agents, servants, privies, personal representatives or any person deriving authority from them, from entering upon, developing, constructing on, or otherwise interfering with the said property known as Matchco (Ile Isana), situate at Emir of Ilorin House, Murtala Mohammed Way, Ilorin, Kwara State.

This writ was issued by **BILKISU TINUOLA GAMBARI** .....of **NO. 5, SANI LAWAL CLOSE, OFF OLA HERALD ROAD, GRA, ILORIN, KWARA STATE**

This writ was served by me at .....on the ..... day of ....., 2025

Signed: .....

Address: .....

**IN THE HIGH COURT OF JUSTICE OF KWARA STATE**

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**HOLDEN AT ILORIN**

SUIT NO: \_\_\_\_\_

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7. RAKIYA AJIBOLA GAMBARI.....CLAIMANTS

**AND**

1. AHMED BOLAKALE GAMBARI
2. UNKNOWN PERSONS.....DEFENDANTS

**STATEMENT OF CLAIM**

1. The 1st Claimant is the lawful widow of the late HRH Alh. (Dr.) Zulkarnaini Gambari Mohammed, while the 2nd to 7th Claimants are the biological children and lawful heirs of the said deceased.
2. The 1st Defendant is one of the four Administrators appointed under the Letter of Administration granted by this Honourable Court in respect of the estate of the said deceased.
3. The 2nd Defendant is an Estate Developer to whom the 1st Defendant, without lawful authority or consent of the other Administrators and heirs, purportedly leased out the property known as Matchco (Ile Isana), being part of the estate of the deceased.
4. The deceased, HRH Alh. (Dr.) Zulkarnaini Gambari Mohammed, died intestate on the 23rd day of February, 1992.
5. The Claimants, as beneficiaries of his estate, applied to this Honourable Court in 2023 for the grant of Letters of Administration, which was duly granted on the 26th day of

October, 2023, appointing four Administrators. A copy of the said Letters of Administration is hereby pleaded

6. The Administrators so appointed are: (1) Sulu Ahmed Bolakale Gambari; (2) Hajia Zeinab Ayobola Zubair; (3) Hajia Funmilayo Buhari; and (4) Hajia Assiat Wuraola Gambari.
7. Among the properties covered by the said Letter of Administration is the parcel of land known as Matchco (Ile Isana), situate at Emir of Ilorin House, Murtala Mohammed Way, Ilorin, Kwara State.
8. The 1<sup>st</sup> Defendant, acting unilaterally and in breach of his fiduciary duty, leased the said property to the 2<sup>nd</sup> Defendant without consultation, consent, or authorization of the other Administrators or the Claimants.
9. The actions of the 1<sup>st</sup> Defendant are illegal, prejudicial, and contrary to the joint fiduciary obligation imposed by the Letter of Administration.
10. The Claimants only became aware of the unlawful lease when they observed agents of the 2<sup>nd</sup> Defendant constructing shops on the said property.
11. Despite several efforts, meetings, and written demands by the Claimants requesting distribution of the estate and cessation of the illegal lease, the 1<sup>st</sup> Defendant has continued to act in disregard of his duties and to the detriment of the estate. Copy of the said demand letter is hereby pleaded.
12. The Claimants shall rely on the Letter of Administration and copies of written demands made to the 1<sup>st</sup> Defendant at trial.
13. WHEREOF the Claimants claim against the Defendants as endorsed in the Writ of Summons.

DATED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2025.

  
BILKISU TINUOLA GAMBARI  
(FOR ALL THE CLAIMANTS)

ADDRESS FOR SERVICE:  
No. 5, Sani Lawal Close,  
Off Ola Herald Road, GRA,  
Ilorin, Kwara State.

FOR SERVICE ON THE DEFENDANTS:

1. AHMED BOLAKALE GAMBARI,  
Emir's Palace, Ilorin, Kwara State.

2. UNKNOWN PERSONS,

Emir of Ilorin House, Murtala Mohammed Way, Ilorin, Kwara State.

**IN THE HIGH COURT OF JUSTICE OF KWARA STATE**

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**AND**

1. AHMED BOLAKALE GAMBARI
2. UNKNOWN PERSONS.....DEFENDANTS

**WRITTEN STATEMENT ON OATH OF BILKISU TINUOLA GAMBARI**

1. I, BILKISU TINUOLA GAMBARI, Female, Adult, Muslim, Nigerian citizen of No. 5, Sani Lawal Close, Off Ola Herald Road, GRA, Ilorin, Kwara State, do hereby make oath and state as follows:  
I am the 5th Claimant and one of the lawful heirs of the late HRH Alh. (Dr.) Zulkarnaini Gambari Mohammed.
2. I have the authority of the other Claimants to depose to this statement on their behalf.

3. The facts deposed to herein are within my personal knowledge, save as otherwise stated, and are true to the best of my knowledge and belief.
4. I reiterate the facts as contained in the Statement of Claim and adopt same as true and correct.
5. I depose to this affidavit in good faith, conscientiously believing same to be true and in accordance with the Oaths Act, 2004.

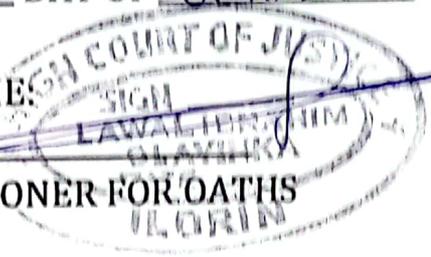
*Ramber*  
DEPONENT:

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SWORN TO AT THE HIGH COURT REGISTRY, ILORIN  
THIS 28<sup>th</sup> DAY OF October, 2025.

BEFORE ME:

COMMISSIONER FOR OATHS



**IN THE HIGH COURT OF JUSTICE OF KWARA STATE**

**IN THE ILORIN JUDICIAL DIVISION**

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**AND**

1. AHMED BOLAKALE GAMBARI
2. UNKNOWN PERSONS.....DEFENDANTS

**LIST OF WITNESSES**

1. BILKISU TINUOLA GAMBARI

DATED THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2025.

\_\_\_\_\_  
BILKISU TINUOLA GAMBARI  
(FOR ALL THE CLAIMANTS)

ADDRESS FOR SERVICE:  
No. 5, Sani Lawal Close,  
Off Ola Herald Road, GRA,  
Ilorin, Kwara State.

**FOR SERVICE ON THE DEFENDANTS:**

1. AHMED BOLAKALE GAMBARI,  
Emir's Palace, Ilorin, Kwara State.
2. UNKNOWN PERSONS,  
Emir of Ilorin House, Murtala Mohammed Way, Ilorin, Kwara State.

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**LIST OF DOCUMENTS/EXHIBITS**

1. Letter of Administration dated 26th October, 2023.
2. Copies of letters written by the Claimants to the 1<sup>st</sup> Defendant demanding distribution of the estate.

DATED THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2025.

\_\_\_\_\_  
BILKISU TINUOLA GAMBARI  
(FOR ALL THE CLAIMANTS)

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