

Researching Statutory/Case Law: Practical Hints

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Being:

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1. INTRODUCTION/APPRECIATION

Let me start by expressing my profound gratitude to Almighty Allah, for giving me the opportunity to speak to this erudite gathering of legal minds. Furthermore, I thank the amiable and highly esteemed Administrator of the National Judicial Institute (NJI), Rt. Hon. Justice RPI Bozimo, OFR, the Secretary of the Institute, the Directors of Study and Research, and indeed the entire workforce of the Institute for inviting to me to make a presentation in this important workshop.

To the learned Research/Judicial/Legal Assistants attending the workshop, I say, congratulations on your selection by your various judiciaries to represent them here. You are employed to work closely with judicial officers and assist them to attain the end of justice. This is essentially a motive based on efficiency, as your presence in the judicial system is assumed to save judges time and enable them to handle more cases effectively. To this end, the major role of a research assistant is to conduct ‘legal research’, which refers to the task of ascertaining the precise state of the law on a particular point¹.

King Goerge III is reputed to have said that lawyers do not know more law than other people, but they know where to find it². The observation is even more applicable to legal research assistants who, by their job description are required to know even more than other lawyers, where and how to find the law. This is because he must conduct legal research in respect of every case that his judge is handling.

2. DEFINITION OF KEY WORDS:

¹ ATH Smith(ed) *Glanville Williams, Learning the Law* (15th edn, Sweet and Maxwell 2013) 211.

² *Ibid.*

This section seeks to clarify the key terms relevant to the title of the paper. It covers the meaning of terms such as “Legal Research”, “Statutory Law”, and “Case Law”

2.1 Legal Research

In general, legal research is the process of finding the laws, rules and regulations that govern activities in human society. It involves ascertaining what the law is on an identified topic or in the given area as well as the enquiry into law with the view to expanding the science of law³. Finding what the law is in a particular area is not an easy task. There may be several statutes with different amendments scattered in different volumes. In addition, these statutes and provisions may be supplemented from time to time by a bulk of rules, regulations, directives and policy guidelines. There could also be various courts pronouncements either expanding or limiting the applications of these rules by interpretation. Legal research therefor involves a process of identifying and retrieving information necessary to support decision making. The primary aim of conducting clear and methodical legal research is finding the answer to a legal question in the most time effective way and knowing that you have searched in all the relevant sources.

2.2 Statutory Law

Statutory Law is the term used to define written laws, usually enacted by a legislative body.

As legislative enactments, statutory laws follow the usual process of legislation. A bill is proposed in the legislature and voted upon. If approved, it passes to the executive branch (either a governor at the state level or the president at the federal

³ See S N Jain, *Legal Research and Methodology*, 14 *Jr of Ind L Inst* 487 (1972), at 490.

level). If the executive signs the bill it passes into law as a statute. If the executive fails or refuses to sign the bill, it can be vetoed and sent back to the legislature. In most instances, if the legislature again passes the bill by a set margin it becomes a statute⁴.

In Nigeria, statutory law generally consists of the Constitution, legislative enactments, domesticated treaties, statutes administrative rules and orders, etc. Since statutory law provides important precedence for court hearings, it is not surprising that finding statutes presents itself as a pertinent and lengthy task for any researcher to undertake. Reading and finding statutes are a key part of any legal action, as nearly every legal suit or motion requires the authority associated with referencing the primary source upon which it is based, which are often statutes (though they could be administrative laws, which are laws enacted by empowered government agencies). When Statutes are added to the laws of a particular jurisdiction, they are said to be codified, meaning they have been added to the state's overriding "code," or listing of laws. Statutory law usually becomes effective on a set date written into the bill. However, they can be overturned by a later legislative enactment; or if found unconstitutional by a court of competent jurisdiction.

2.3 Case Law

According to Merriam Webster Dictionary, Case Law is the law established by judicial decisions in cases as distinguished from law created by legislation⁵. It is the collection of reported cases that form the body of law within a given jurisdiction.

⁴ Statutory Law < <https://www.hg.org/statutory-law>. > accessed 1/09/2020.

⁵ Case Law < <https://www.merriam-webster.com/dictionary/case%20law>>accessed 1/09/2020.

Case law is predicated entirely on the laws that are interpreted through the process of stare decisis, which generally means that courts respect and adhere to the precedent of previous decisions. Thus, The Supreme Court stated in *National Electric Power Authority v Onah*⁶, that stare decisis means to stand by your decision and the decisions of your predecessors, however wrong they are and whatever injustice they inflict. However, a court does not have to stand by a decision that is not binding precedent. Generally courts will follow the decisions of higher courts in their jurisdiction. Therefore the effect of a court's decision on other courts will depend both on the level of the court and its jurisdiction. A decision by the Supreme Court is binding precedent in all courts. A decision by the Court of Appeal would be binding in all lower courts⁷.

The whole essence of judicial precedent is that it is a law developed or evolved by courts. This therefore poses a serious challenge to the common law on the claim that judges of the common law courts do not make law, whereas the doctrine is no doubt well entrenched in its system⁸.

3. SOURCES OF INFORMATION/RESEARCH MATERIALS

In the process of ascertaining the state of the law on a particular issue, a researcher has to choose which materials to use. All legal resources can be broken down into two categories: **primary and secondary sources**⁹.

3.1 Primary Sources

⁶ 1 NWLR (Pt. 484), Page 680 at 688.

⁷ Obilade, Akintunde Olusegun, *The Nigerian Legal System* (Ibadan: Spectrum Law Publishing, 1990) p. 111.

⁸ Tobi N. *Sources of Nigerian Law* (Lagos: MIJ Professional Publishers Ltd, 1996) pp. 78 – 80.

⁹ *Ibid.* Tobi thus identifies the sources of Nigerian Law as: the Nigerian Constitution; Customary Laws that have been in existence from ancient time; Islamic Law that is universally applicable among Muslims; and Received English Law brought into the country by the British colonialists. Other sources include International Law, Case Law, and Legislation.

The sources that contain original information and observations are known as primary sources of information. The law found in primary sources can take many different forms. They include cases, statutes, administrative regulations, local ordinances, state and federal Constitutions, and more.

Primary sources are often more difficult to read and digest than secondary sources, but it is unwise to rely solely on secondary sources. This is because laws can quickly change as courts issue new decisions or the legislature passes new laws. You won't always see these changes reflected in secondary sources. On the other hand, looking at primary sources is the quickest way to get the most up-to-date information.

Another reason to rely more on primary sources is that it is possible to get a lot more detail—that is, to find information that is much more helpful, specific, and targeted than you'll find in a secondary source. For example, assuming your dog broke through the fence and bit a neighbor who was stealing some items from your yard, you would want to know whether you are liable for the neighbor's injuries given that the dog was fenced in and it was not intentionally released; and that the neighbor was trespassing on your property.

You may find a secondary source that explains your liability when your dog bites someone, or your responsibility to a trespasser injured on your property. But by looking at primary sources, you might find a case or series of cases with very similar facts to the situation you're in, helping to put these two legal issues together into one. This will allow you to see how a court may apply the law to the facts of your case. Finally, primary sources are very important because courts give them much more weight than they do secondary sources. Secondary sources only tell courts what legal scholars say about a legal principle, and courts want to see the actual source of the law itself. If the court is required to follow the primary source—for example, because it was issued by a higher court in the same

jurisdiction—the court will certainly want to see it in original form.

When to Use Primary Sources

It's important to use primary sources when you're trying to put together a document or an argument that carries legal weight. As we've explained, courts attach greater importance to primary sources than secondary sources. It's also very important to use primary sources when you want to know exactly what the law says. Secondary sources may explain the law, but they won't be able to give you the full detail of what is actually there. Though reading primary law can be difficult, it is very important to do it if you really want to understand the details.

3.2 Secondary Sources

While primary sources are the texts of laws themselves, secondary sources are documents that interpret or discuss the primary sources. This may include textbooks, journals, newspaper articles, online posts, and so forth. The depth of treatment you get from any given secondary sources can vary a great deal. Some secondary sources are very detailed and very helpful, while others may provide only a broad, general overview of a topic. Hence, finding the appropriate secondary source will depend, largely on what stage you are in your research. At the beginning, you may need only enough information to get basic foundation of your research topic. But as your research progresses, you may want to find secondary sources that provide much more specific treatment of your legal issue.

When to Use Secondary Sources

Secondary sources are a logical place to start when you do not know anything about the topic you are researching. A secondary source can often explain the basic concepts you'll encounter in primary sources, making it easier to read them. It will also often cite some primary sources, thus helping to deepen and

expand your research¹⁰.

4. WHERE TO FIND LEGAL RESOURCES

The most popular method for accessing relevant primary material is to use law libraries or to go online. It usually isn't too difficult to find a case, statute, or regulation just by doing some searching around on the Internet. Once you have a source, however, you have to ensure that it is still "good law." Legislatures pass new laws; courts overrule previous decisions by lower courts; and administrative regulations are amended or repealed. This means that even once you've found a relevant primary source, you have to ensure that nothing has happened in the meantime that would undermine its validity.

There are so many things you can find within minutes—but you have to know where to look to conduct legal research. Here, we'll cover several different options.

i. Law Libraries

Law libraries remain an excellent resource for the legal researcher. For one thing, they usually have a lot of legal books and resources that aren't available on the Internet, or at least not without paying fees. Additionally, libraries come with another helpful resource you'll have trouble replicating on the Internet—librarians. When you're having trouble finding a source, are confused about where to begin, or just need help understanding something you find, a librarian can help. In a law library, you may be able to gain access to expensive online legal resources that we'll discuss in further detail below.

Every court will likely have a law library, and research assistants should plan on

¹⁰ Secondary sources are also useful when you want to learn how things are generally done, or how they are done in other states. Many national secondary sources give a broad overview of the law, which can vary from place to place. This can be helpful when you're trying to learn the basics of how the law works, or when you need to compare how different jurisdictions handle the same issue (for instance, while conducting legal research for an academic paper).

spending most of their time researching in the library itself, as this will familiarize them with the most useful resources. Notably, most law libraries also have e-library recourses.

ii. Court Offices and Self-Help Centers

Another good resource for a lot of legal material may be found in the court. As we mentioned, today, many courts recognize that litigants may be representing themselves and need some help understanding legal processes. Some courts have self-help offices or offices staffed by lawyers or clerks who help litigants figure out what forms to file, what deadlines to meet, and so forth. These offices also often have basic information and documents to explain the process litigants must go through to resolve a legal issue in the court system. However, these lawyers or clerks do not represent you and cannot give you legal advice. They are just there to help you understand the legal requirements for working your way through the court system, or to explain your options to you. Many courts also have helpful information online.

iii. The Internet

Most legal researchers will spend at least some of their time researching on the Internet (and many will spend most of their time there). The Internet is useful at every stage: when you're trying to get general information about a topic, when you're looking for specific legal sources, and when you're trying to figure out what to do with the information you have uncovered¹¹.

Some useful legal research websites include the following: Law Pavillion; Legapaedia; LexisNexis; Westlaw ; Nolo ; Justia ; FindLaw ;VersusLaw ;

¹¹ For details see, Diana Botluk, *the Research on the Internet* (West Group, 2001).

FastCase ; LoislawConnect; etc.

5. PROCESS OF LEGAL RESEARCH

Knowing the required resources for legal research and how to locate them is just the beginning of learning how to conduct legal research, you need to also master the process. This is because Legal research requires a methodical approach and it should take place in a number of stages.

In conducting research, it is essential to begin by evaluating the legal problem before you. Doing so will enable you to determine the specific legal question or issue you need to answer. Since this will be the focus of your attention, identifying it will put your research on the right path and will help you choose the best research tools. You will also save time and improve your end result if you develop the legal question(s) before you even pull a book off the shelf or access an online database¹².

5.1 Preliminary Research Considerations

1. Organization

Legal research can be time-consuming and details are important. To be successful, you must be organized, methodical, and thorough. One way to organize your research is to keep a research journal in which you record any relevant information you have found. This A research may seem time-consuming at the beginning of your research. However, the time you spend writing in your research journal should help you focus your research. Reviewing your research journal from time to time will remind you what avenues of research you have pursued. E.g. The primary sources that you have used so far e.t.c.

¹² For further details, see David Scott, *Legal Research* (Lawman, India, 2nd edn, 1999).

2. Jurisdiction

A preliminary question to tackle is jurisdiction, i.e., whether federal, state, or local law will likely govern your research problem. Jurisdiction means the geographical area within which a court or law has the right and power to operate. The operation of laws generally are limited by geography whether regional or international.

It is important that a researcher determine from the onset what jurisdiction the research will cover. This you can deduced from the facts of the case before (or the research question). A research problem may be governed by the law of more than one jurisdiction. Additionally, a researcher hoping to find mandatory authority, may have to rely on persuasive authority if there is no mandatory authority on point. Persuasive authority here means foreign legislations and judicial decisions.

5.2 STEPS/STAGES OF THE RESEARCH

Generally, legal research encompasses a series of steps, beginning with a research problem and ending with an answer to the problem. This would also apply when you are researching statutory law; or case law. One common method to research legal issues is **FILAC** (facts, issues, law, analysis, communication)

1. **Facts:** Factual analysis isolates the relevant facts. This will help you expose the legal question and issue/s. An effective way of carrying out factual analysis involves the PEC. The acronym stands for **Parties, Events and Claims**. The legal research assistant should be well acquainted with the nature of the case as well as the established facts of same. Without this, he can hardly be of any meaningful use to his principal in the case. In the same vein, identification of the laws applicable to the facts and nature of the case is of utmost importance. The legal research assistant must be ever keen to find these out and work on them.

2. **Issues:** Legal issues are fact-dependent and the process of defining the issues requires a high level of creativity. Depending on how you frame the facts, several legal issues may take shape. A claim may be more successful if the facts are framed in a certain way. Indeed, you can't change facts but you have control over how the issues are framed. The legal issue framed will determine how and what form the legal research will take.

From his detailed knowledge of the case, a research assistant should help suggest to his principal, issues for determination in the case. He should also read, summarise and analyse the written addresses of learned counsel to the parties in the case.

3. **Law:** Once you have framed the legal issues, you can begin searching for the law that governs these issues. The law can be found using Primary & Secondary sources of law. Remember that primary sources are the actual law; while secondary sources explain, comment on and critique the law. i.e. things that clarify and discuss legislation and precedents such as textbooks, articles, etc. In the event of conflicting decisions of the appellate courts (like Court of Appeal and Supreme Court) on a given rule, principle or set of facts, the researcher should strive to find out the following and advise his principal accordingly:

- i. Distinguishing facts, if any, between the conflicting appellate decisions on one hand and between the said decisions and the instant case on trial on the other hand.
- ii. Noting The latest of the conflicting decisions and
- iii. Also suggesting which of the decisions best serves the interest of justice, given the peculiar facts and circumstances of the case at hand.

Similarly, in the event of the absence of local (Nigerian) authorities on the case on trial, the researcher should look for foreign, especially common wealth

decisions, that could be of strong persuasive importance and advice his principal accordingly.

4. **Analysis/Application of law to facts:** Legal analysis is sometimes considered the most important part of the legal research process. Analyzing the law involves applying the relevant legal principles to the issue/s in an effort to achieve a favorable outcome. In carrying out legal analysis, one must compare contrast and synthesize relevant cases (distinguishing certain cases from the present facts and applying certain cases as precedents). A research assistant should be able to read and interpret statutes, and apply the law (as he understand it), to the facts of the case. Furthermore, he should help his principal in evaluating and making findings out of the facts of the case and even go further to make honest and confidential recommendations to his principal¹³.
5. **Communication:** Your findings at the end of the analysis must cause you to arrive at a conclusion which must be communicated. Depending on the context of your research, as research assistants to judges, your findings may be communicated verbally in court, in a written opinion explaining the law on the research issue. Regardless of the context, proper communication of your conclusion requires solid advocacy and writing skills.

5.3 Researching Statutory Law

Many Law Libraries have printed sets of both federal and state legislation in Nigeria. Starting from the most basic, statute which is the Constitution of the Federal Republic of Nigeria¹⁴.

¹³ IT SHOULD BE NOTED THAT such suggestions are only advisory as the researcher simply works behind the scene while the whole judicial responsibility is on him (the judicial officer) and not shared with any other person or authority.

¹⁴ cited as *CFRN*, 1999; 1989; 1979 and 1963.

Federal laws, including subsidiary legislation, can be found in volumes which are available as Laws of Federation to be cited as LFN 2004 . It is also possible to find earlier revisions for 1990, 1958, 1948 and 1923 along with some revisions for individual states prior to unification in 1914. Other Legislative Acts/Statutes include:

Criminal Code Act Cap 38, Vol. 4 as CCA in force since 1961, also Cap 77, vol. V. (1990); Criminal Justice Release from Custody) Special Provisions Act as CJA Cap 40, vol. 4 in force since 1977; Criminal Procedure Act as CPA 41, vol. 4, in force since 1945, Cap 80 (1990) Criminal Procedure (Northern States) Act, Cap 42, Vol. 4, 1960 and Cap 81 (1990); Evidence Act (EA) Cap E14, vol. 6 1975, Cap 62 1990; Penal Code as PC (Northern States), Federal Provision Act, Cap P3 Vol. 13 1960; Police Act, Cap 359, LFN 1990; Correctional Service Act 2019; ; Administration of Criminal Justice Act, 2019; Child Rights Act 2003 , etc

Similarly, each state makes its own laws, and many Law libraries hold printed legislation for most Nigerian states¹⁵. Examples of state legislation include:

Annual Volumes of the Laws of Kaduna State of Nigeria and Subsidiary Legislation.

The laws of Akwa Ibom State: in force on the 31st day of December 2000¹⁶.

The laws of the Plateau State of Nigeria: in force on the 1st day of January 1994¹⁷.

The laws of Lagos State of Nigeria: in force on the 30th day of June 1994.¹⁸

Fortunately, nearly all federal and state statutes can be found online at the official government site (“.gov”), making access to these codes and statutes far easier than

¹⁵ Libraries also hold legislation from earlier organisations of states and regions eg. Northern Region, Eastern Region, and Western Region.

¹⁶ (Millhaus Publishing:2000).

¹⁷ (Government of Plateau State Nigeria).

¹⁸ (Government of Lagos State of Nigeria).

it used to be. Most legal databases and legal Internet portals also keep up to date listings of legal codes.

Tips on How to Locate a Statute

The first step in finding a statute is to be assured that statutory law does exist for the case at hand. Good areas to start include secondary sources such as “law review articles” and other sources related to statutory law. Also, familiarity with the organization of Statutes is important. This is due to the fact that codes exemplify the way in which current statutory law is arranged according to subject eg LFN 2014.

When using the internet sites such as legalpaedia, Lexis-Nexis and West Law, you may just enter in citations of code into the prescribed search areas. When finding statutes by topic, however, you may search according to keyword terms. You may therefore locate these texts in various law libraries. Be advised that each possesses its own specific ways of indexing or classification. If you already possess the specific citation for your statute, you may look to match the title number with the corresponding section. If you lack this number, however, you may look to the subject index or a “general index” which will also provide you with topics related to each federal statute.

Without citation, there are Four Ways to Find Statutes which include the use of : index; table of contents; keyword searching; and popular name table

1. *Index*

An index is at or near the end of the print statutory set and may include several volumes. For example, most compiled or codified laws have indexes. Also, Westlaw and other online resources have indexes.

Advantages of using index to locate a statute

- i. You never know what terms will be used in a statute (homicide, murder, unlawful killing?) or where a section will be located in a table of contents so looking in a subject index saves a lot of time
- ii. You can find all sections on a topic in one place
- iii. Using an index is usually the best place to start statutory research!

2. Table of Contents

A table of contents is at the beginning of a print code title or statutory set. It is also found online.

The advantages of using Table of Contents to locate a statute are similar to when using index. However, the disadvantage is that sometimes you don't know where to begin looking.

3. Keyword Searching

A keyword search recognizes terms and connectors (boolean) searches and sometimes natural language and features a prominent search box. Keyword searches are only available online.

The advantage of keyword searching is that it is a very powerful search method since you can directly search the full text of statutes. However, sometimes it is hard to guess the terms/words used in a statute (divorce or dissolution? alimony or support?)

4. Popular name table

The popular name table is usually at the end of a print code title or statutory set. All the major commercial databases also include popular name searches.

The advantage of searching with a popular name table is that you can find a law by its "nickname," e.g., Disability Act; The disadvantage is that sometimes, the nickname may not be popular enough to be included in the popular name table.

No matter the method or resource you use to locate a STATUTE, always note down the following key components:

- i. Chapter name; It is important to show the name and chapter of the statute.
- ii. Short title; defines the Act.
- iii. Commencement date; Date the statute came into force.
- iv. Long title; Indicates the purpose of the statute.
- v. Arrangement of section; Table or summary of sections.
- vi. Marginal notes.
- vii. Schedule; attached at the end of the statute

5.4 Researching Case Law

Finding cases is far easier than it used to be. With technology, researchers no longer have to spend hours or travel across the country to find an authority. However, while many databases are now computerized, the basic content and organizational systems upon which these databases are predicated are still based upon the rules established by their hard copy equivalents, and many legal libraries will still insist on owning hard copies of case records. These publications take up numerous volumes per year, as one would expect, and come in many different formats. Even outside the realm of publishing, records of decided cases are always on file at the court of record, so they can be acquired by going to the court and applying to get certified true copies from the court registrar. Furthermore, all the Federal Courts in Nigeria and most State Courts have dedicated websites and all decisions emanating from the courts are uploaded on a regular basis. Notably, the Supreme Court certifies its judgements immediately it is delivered.

Generally, cases are published in chronological order in books called **Law Reports**. However, Law reporting in Nigeria is mostly done on a commercial basis and you have to purchase the hard copies. Examples of law reports in Nigeria (which I believe you are very familiar with) include:

Nigerian weekly law reports ;Nigerian monthly law reports ; All Nigerian law reports ;Nigerian commercial law reports ; Judgments of the Supreme Court of Nigeria ; Reserved judgements of the Supreme Court of Nigeria; Nigerian criminal reports ; Weekly reports of Nigeria ; Shari’ah Law Report ; Banking and financial law reports

Examples of State Law reports include:

Abuja Law Reports ; Delta State Law Reports; Rivers State Law Reports ; Selected Judgments of the High Court of Lagos State, etc.

Tips on How to Locate Case Law

When you have the citation of a particular case, locating the case is very easy and straightforward. However, in many situations, a researcher will not have a case citation when he begins the research. He may only have an issue or topic that he needs to find some case law on. Without a case citation, a researcher would have a daunting challenge trying to go straight to a law report to locate a particular case. In this regard, there are several avenues that a researcher can explore. Some suggestions are discussed hereunder.

1. **Using Annotated Codes (statutes):** annotated codes provide researchers with citations to case law after the text of the statute. The cases will be grouped together by topic and they will often include a short summary. This provides the researcher with an easier method of locating case law that deals with their particular issue. Examples include Evidence Act Annotated with Cases; Criminal Code Act and Other Related Acts Annotated with Cases¹⁹

¹⁹ Both by A. M. Adebayo.

2. **Using Digests:** A digest is essentially an index to case law. It takes the headnotes that summarize the points of law discussed in each case and organizes them by subject. This enables researchers to determine if a case would be worth further exploring without having to read the entire case. It is wise to determine the jurisdiction for which you need to find cases, then consult a digest that covers that jurisdiction. See Gani Fawehinmi's *Digest of the Supreme Court Cases*²⁰.
3. **Using Legal Encyclopedias:** Legal encyclopedias are another great way to find case citations on topics. Generally, a legal encyclopedia is arranged alphabetically by topic, which are further divided into more detailed subtopics. They provide broad coverage of law, including excerpts from judicial decisions and statute over a wide range of topics that are arranged alphabetically. Many of the topics include footnotes with citations to relevant case law. See Sasegbon's *Laws of Nigeria*²¹
4. **Using Online Resources: These are** research systems provide users with a powerful tool for retrieving case law. They allow researchers to search for cases by party name, case citation, or by keyword searches. Examples are : **LexisNexis; Legalpaedia; Lawpavillion; Lawguru, etc**

No matter the method or resource you use to research a CASE, always note that you note down all the components of the Case . These are:

1. Name of the case; Find the name of the parties.
2. Citation of the case; Shows case number and year.
3. Date of decision; Date court made the decision.
4. Catch words or key words in a case.
5. Head Notes; summary of court decisions.

²⁰ Gani Fawehinmi (ed.), *Digest of the Supreme Court cases 1956–1984*. Lagos: Nigerian Law Publications.

²¹ Sasegbon's Law of Nigeria : An Encyclopaedia of Nigerian and Practice (DSC Publications,2005).

6. Advocates who represented.
7. Marginal letter; these are used for purposes of checking reference.
8. Decision of court.
9. Order of court.

5. CONCLUSION

Traditionally, a Judge, who essentially acts as an arbiter, has to find the most relevant rules and principles of law from statutes and statutory instruments argued by the contesting parties, and to apply them to the facts of the contested case brought before him. The duty of his research assistant is therefore to ‘find’ the relevant law, judicial authorities and relevant principles applicable to the facts of the case. The role of legal assistants with respect to the quality of any judgement that emanates from any court cannot be overemphasized. Landmark judgements carry the names of our highly revered judges, but those landmark judgements bear the imprints of the legal assistants, who indeed are unsung heroes. It is therefore highly recommended that legal research assistants should be regularly considered for appointment as judicial officers, once they attain the required years and meet other required standards. This way, they are better motivated to continue the good work.

I thank you all for your patience.