**ALL NIGERIA JUDGES’ CONFERENCE OF THE LOWER COURTS FOR MAGISTRATES AND JUDGES OF THE AREA /SHARIA /CUSTOMARY COURTS**

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PAPER TITLED:

JUDGECRAFT; THE ART OF JUDGMENT WRITING IN THE LOWER COURTS

**BY**

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**INTRODUCTION:**

I am honoured to be invited to participate as a resource person in this conference organized by the National judicial council for All Nigeria Judges of the Lower Courts for Magistrates and Judges of the Area / Sharia / Customary Courts. I specially thank the Administrator of the National Judicial Institute, Hon. Justice Salisu Garba Abdullahi (Rtd) for this opportunity.

Any society devoid of dispute is not an ideal society. Hence where there is dispute there has to be resolution of such dispute and where there is no timely, accessible and trusted mechanism for dispute resolution, simple issues and crimes can escalate to broader issues with dire consequences for the society. The purpose of this paper is to explore the Judgecraft and Judgment writing. Both go hand in hand as the latter is the end result of adjudicating, a clear display of the product of the trusted mechanisms set in place for dispute resolution.

This paper will explore the inherent qualities of Judges of the Lower Court and how these qualities are applied in dispensing justice effectively as well as considerations that are relevant to judgment writing. It will further explore the guiding principles to successful judgment writing.  At the end of this paper, we should be able to know our shortfalls, realign to best practices and improve on our skills for the benefit of all, looking at the judiciary as the hope for the common man and indeed the society at large.

**JUDGECRAFT**

“Judgecraft is the art of judging. It is about how judges do their jobs and encompasses everything that you will not find in a book on law of evidence or procedure. [[1]](#footnote-1) It involves everything the judge does from hearing a suit or application to resolution of the dispute before the court .The job of a judge of a lower court is an onerous one and this is because the lower courts are known as the grass root courts. They are the first point of call for most litigants hence numerous cases are filed in the lower courts on daily basis. Therefore the ability to dispense with these cases is important. In the discharge of his duty, the judge must bear in mind his role in the society during proceeding and these roles help to ensure fair trial for all parties. The role of a judge is to resolve disputes, uphold the rule of law and make effective orders providing appropriate relieves consistent with the judge’s decision and prescribed laws. According to Bergar and Luckman ; “to engage in judging is to represent the role of a judge …the role represent an entire nexus of conduct”[[2]](#footnote-2)

 Judges must possess attribute that will enable them to perform their duties without leaving impression that would discourage litigants and society at large.  As Judges of the Lower Court, we are already conversant with some of the rudiment of the job, however we still have to remind ourselves the qualities we possess that helps us to dispense justice in line with the guidelines for judgcraft. The guidelines for judgecraft incorporate 6 core judicial values derived from Bangalore principles of judicial conduct – namely independence, impartiality, and integrity, propriety, ensuring equality of treatment, and competence and diligence.[[3]](#footnote-3) In the words of Socrates:- four things belong to a judge; to listen courteously, to answer wisely, to consider soberly and to decide impartially[[4]](#footnote-4).

**Independence:**

A Judge must perform his duties in a manner that exudes independence. A Judge must be free from all forms of interference from anybody whether internally or externally. This guarantees that the society will have confidence in the Judiciary. The slightest interference in the duties/ discretion of a Judge will have a tremendous effect on the outcome and perceived outcome of his decision.

**Impartiality:** In exercising and performing one’s duty as a Judge, the judge should remember his judicial oath taken during swearing in which is as follows;

“I will discharge my duties and perform my functions honestly, to the best of my ability and faithfully in accordance with the constitution of the Federal Republic of Nigeria… I will not allow personal interest to influence my official conduct[[5]](#footnote-5)

This generally means that justice will be done to all manner of person without fear or favour. A judge should avoid any conduct that will suggest bias. The judge must not descend into the arena. Parties should be allowed to conduct their cases before the court. In the case of OGBOKA v STATE the court held that the learned trial Judge erred in stepping into the arena and usurping the Prosecutor’s undoubted function.[[6]](#footnote-6)

**Integrity:** In discharging the duties, a Judge must ensure he adheres to ethical principles. The integrity of the Judge is crucial hence a Judge should ensure that his conduct in and out of court does not undermine public trust. The integrity of the court is an indispensable condition in dispensing justice. The integrity of the court is distorted if the character of the Judge is in question. Let your nay be nay and yes be yes.

**Propriety:** The Judge must conduct proceedings in a conventionally accepted standard which will attract and retain public trust in his court. A Judge must avoid bullying of lawyers and litigants in courts; speaking vernacular, use of rude and derogatory remarks, getting emotional, easily offended or shouting. These are conducts not to be found in a judge. They raise doubts in the minds of both the Bar and the litigants; questioning the weight and the wheel of justice. A judge must avoid association that might lead or undermine the public confidence and trust in the bench. Naturally before becoming a judge one was first and prominently a child then a family member, then a citizen with voting rights, then a lawyer etc. Through this journey of life relationships and memories have been formed as well as shaped principles and behavioral tendencies. Notwithstanding, the judge must always be seen and heard to stay clear and far from politics and social frolics.

**Ensuring Equality of Treatments**

Everyone deserves to be treated equally by the court irrespective of who you are in the society. Everyone must be given opportunity to be heard in Court. The first of the principle in latin maxim is: *audi alteram partem* meaning that no one should be condemned without being heard. The doctrine presupposes that the parties must be given equal opportunity of stating their cases and opportunity must be given to the opponent to defend. In R v Chancellor of the university of Cambridge :Dr Richard Bentley’s case ; Fortesque J. stated the need to observe natural justice by pointing out example set by the Almighty and infallible God himself to guide us thus:

The laws of God and man both give the party an opportunity to make his defence if he has any…Even God himself did not pass sentence upon Adam before he was called upon to make his defence. Adam says God, where art thou?(He knew where Adam was) has thou eaten of the tree whereof I commanded thee that thou should not eat? (He knew Adam had hence the leading question). And the same question was put to Eve also[[7]](#footnote-7)

 The same level of respect and opportunity given to A should be given to B. What is good for the goose is good for the gander.

**Competence & Diligence:** In performing our functions as a judge, we must apply current position of the law. Let us not try to use the easy way out, by only vesting our decisions in our discretionary powers. Let us always keep up with the ever evolving wheel of justice. Proper research is the key to winning the art. A judge must make sure his decision can be taken to the bank. This can only be done if we update ourselves regularly and are abreast with the current position of the law. As a judge, when the Bar and members of your court room see that you are updated with the latest supreme court decisions on applicable law, this will always boost the confidence in the court and judicial system as a whole.

Every Judge has to be sufficiently astute, hardworking or clever enough to be able to, within a space of few hours not only to read and understand but to get themselves into a position to decide which of the two competing submissions is right-to be able to challenge the submissions of those counsels-who may well have been working on the case for years - to discuss the case intelligently with colleagues, and then write a judgment or comment on a draft written by someone.[[8]](#footnote-8)

**JUDGMENT WRITING**

The final determination of rights and obligation of the parties in a case is known as Judgment. At the end of every trial, a Judge is expected to take a decision on the dispute before him. It is the outcome of that decision that is known as judgment. From ancient history, judgment have been made and passed down in different forms through folklores and ancient text, the most essential are the written document from as far back as the Roman text, to English Laws, journals and most recent documentation in law reports. Judgments have been the bedrock of laws through ages.

**Importance of a Judgment**

1. For clarity and transparency: written judgment explains rational behind a decision taken by court. This makes it possible for litigants, lawyers and general public to know why a judge made a particular order or resolved a case in a particular direction as well as the guiding laws and previous decision relied upon to ground such decision. It gives the public an opportunity to delve into the mind of the court, with rare privilege of seeing how the court thinks, and guide the Bar and public on what is expected of them.
2. Accountability: The judgment should be based on reasoning that you are certain is the right one, in line with the latest locus classicus. In pronouncement, one should not be wavering or sitting on the fence. A judgment demands full accountability for a decision whether you grant or refuse, you will be fully responsible.
3. Future Reference: No matter how insignificant a decision might be, it serves as a reference for future cases. Therefore, a Judge must be extra careful in their statements. Lecturers, courts as well as students can use it as a reference point in future.
4. Appeals: Whenever a dissatisfied litigant disagrees with a Judge’s opinion, they file an appeal. It is imperative that the Judgment be painstakingly clear and unequivocal that it conveys the reasoning as to why a certain path is towed. It becomes complex and difficult for appellate when a Judge is unclear, ambiguous or worse verbose. For certain situations, it forms part of a legal document. Therefore a Judge must ensure that his thoughts are fully conveyed in words that any sane and educated person will understand and appreciate the decision of the court.

**The Judgment is the Judge**

To every Judge of every grade, his or her judgment is in practical terms, his window to the world.[[9]](#footnote-9) It behooves on us to come up with a well-reasoned written judgment. Judgment writing is a skill that requires practice, care and self-reflection.

**Preparing to write the Judgment**

In preparing to write a judgment, the Judge must think carefully on what he wants to say and how he wants to say it. With the advent of the computer age, some of the Judges now type out the judgment by themselves, as opposed to the long written version. Some judges have their strength in being great orators, whilst others are best at being articulate writers, wherever the strength lies, take time to put the thoughts together deductively and flow seamlessly in the method of writing.

*“Pride of authorship is by no means an unmitigated evil. This pride can drive a man to hard work and with meticulous effort. The poorest opinion are apt to be written by judge who take no pride in them, who regards preparation of them as mere chores. Pride in work well done in a proper incident of good craftmanship in any(sic)the field of work including law. An opinion in which the author takes no pride is likely to be much good”.[[10]](#footnote-10)*

As a written judgment encapsulates the decision of a magistrate following a hearing whether it be in a criminal or civil matter, it is essential that the Magistrate be organized prior to commencement of the hearing and during the hearing so as to alleviate the inherent stress of writing a judgment.[[11]](#footnote-11)

It is important to note that judgment writing doesn’t begin at the end of the hearing but rather at the commencement of the Hearing. If during the trial the judge does not note those facts and points whilst taking down record of proceedings, preparing the judgment will become a herculean task indeed.

**A guide in preparation**

It is important for the magistrate to prepare before putting his thought down in writing bearing in mind that his duty is to do justice. Hence whatever he eventually puts down in writing is impactful. The magistrate should always have **complete/good grasp** of nature of matter before him. There are two ways a judgment is written, it can be written on the spot (bench judgment) or reserved. A bench judgment can be delivered on certain cases such as summary civil cases ie the undefended or where the defendant in a criminal case pleads guilty etc. The court can(sic) go ahead to deliver its judgment where the defendant pleads quilty. Some of the benefits of bench judgment is reduction of the number of cases in the docket of the magistrate. The judge has the benefit of addressing matters while its yet :(sic) fresh in mind and in particular , his perception of the witnesses ; he can move directly on the question of cost, interest and draft any order consequent upon the judgment; he can conclude a unit of business.[[12]](#footnote-12) Bench judgment also comes with its own(sic) challenges one being:(sic)he possibility of omitting something vital . On the other hand reserved judgment has the benefit of enabling the judge to come to terms with complex issues of facts and law , and to deal with complex issues of fact and law, and to deal with lengthy bodies of evidence or cross examination of copious amount of documents.[[13]](#footnote-13) There are also disadvantages with reserved judgment especially when its reserved for too long . Its is said that *justice delayed is justice denied* , the reverse is equally disturbing , justice rushed is a travesty of justice and a threat to the fabric that binds civilized society together.[[14]](#footnote-14) The magistrate / judge should bear in mind that his judgment should be delivered timeously.

In order to have a tidy and well written judgment, the judge must set out any application made before him and also set out the applicable laws at the close of evidence. Furthermore ensure that those applications are fully dealt with before embarking on writing the judgment.

**Situations to watch out for.**

* In The lower courts, being courts of summary jurisdiction, the magistrate should go through the claim and evidence in respect of the facts accurately written and contained in the record book.
* Thereafter, the magistrate should pick the bone of contention in the case and ascertain the issues for determination, also taking into consideration issues raised by counsels.
* Where there is no counsel, the magistrate must jot down issues that he believes emanated from the evidence before him which is to be resolved.
* The judge will pay attention to the respective evidence in support and against the issues. The magistrate should focus and conduct a thorough research on the applicable laws and current position of the law (this cannot be overemphasized). By doing this, the magistrate should go through the authorities cited by counsel. There is also need to jot down the authorities that are relevant and support the relevant evidence in court.
* It is important to note that while hearing is ongoing, the demeanor of the witness which was observed and noted should also be taken into consideration when letting out points in the judgment.
* Magistrate should also ensure that the exhibits were properly tagged. The magistrate in preparing for his Judgment, must consider the time within which to deliver the Judgment.

Finally, the summary of preparation can be listed below.

1. Significant aspect of evidence of witnesses
2. Conflict between the evidence of witnesses
3. Issues that have arisen
4. Thoughts about those issues
5. Impression of witnesses including their credibility and reliability and
6. Parts of case considered to be significant in the writing of judgment. [[15]](#footnote-15)

**STRUCTURE IS ESSENTIAL**

Structure contributes to the effectiveness and reliability. A clear structure in judgment makes it easier to present information logically. It also ensures that all critical elements are addressed, as well as helps convey the reasoning behind the judgment. There are number of ways to structure a judgment. However, the structure of a judgment must have a beginning, middle and conclusion. I will explain this in 2 folds namely, structure in a civil case and structure in a criminal case.

**The structure in a civil case**

The structure in a civilcase will have the following component

* **Beginning**; this section will consist
1. *Name of the court, the Judicial Division or District, names with designation of the magistrate/Judges and date of the Judgment.*
2. *Suit Number*
3. *Names of the parties*
4. *Appearance*
5. *Caption*
* **Middle;** this section will consist of
1. *Introduction* which will include the claims/relief, statement of defence and a counterclaim where the opposing party decides to file a defence or counter claim. It will also include the plea of the defendant or counter defendant
2. *Facts*
3. *Issues*
4. *Applicable Law*
5. *Reasoning*
* **The Conclusion;** this section will comprise of the following
1. *the final decision/ order*
2. *Signature of the Magistrate/Judge, name and designation.*

**Structure in a criminal case**

A similar structure is recommended for judgment in criminal cases but with slight variation. The structure in a criminalcase will have the following components

* **Beginning**; this section will consist
1. Name of the court, the Judicial Division or District, names with designation of the magistrate/Judges and date of the Judgment.
2. Charge Number
3. Names of the parties
4. Appearance
5. Caption
* **Middle;** this section will consist of
1. The introduction which will include the nature of the offence in the charge sheet and the plea of the defendant.
2. Facts
3. Issues which will include whether prosecution has proved his case against the defendant beyond reasonable doubt
4. Applicable Law
5. Reasoning
* **The Conclusion;** this section will comprise of the following
1. The verdict
2. Allocutus ; where the court finds the defendant guilty
3. Sentencing; if the defendant is guilty
4. Signature of the Judge, name, designation and date

**The Beginning**

The name of the court, judicial division /district and name of the presiding magistrate (as the case may be) will enable the reader to identify the court where the judgment emanated from. It will also enable readers to know when the judgment was delivered. The suit number identifies the particular suit and differentiates it from all other suits and no two suits share identical suit number as suits are numbered serially every year beginning with number one.[[16]](#footnote-16) In criminal cases, we have the charge number as against suit Number found in a civil suit and it also serves the same purpose as a suit number in civil cases. The names of the parties are the names indicated on the records as the name of the person suing or person being sued. [[17]](#footnote-17) The essence of names of the party is to reveal the identity of person involved in a case. The names of the parties should be in full and not abbreviated. This will aid to avoid misinterpretation or misrepresentation of person or denial in future. Where there are so many claimants or defendants, their full names should be written one after the other.

Appearance of counsel follows immediately where parties are represented although some court might decide to write the names of legal representation at the end of the Judgment. The caption is either written as Judgment or ruling as the case maybe.

**Middle**

 *The introduction* starts with the nature of the dispute. Where the case is a civil matter, the claim will be stated and the counterclaim if any followed by the plea or how the matter came to court (for instance by motion). If it is a criminal matter, the offence in the charge sheet will be stated followed by the plea.

*The fact of the case* will deal with the detailed account of the relevant facts and circumstances leading to the dispute at hand. It will consist of the evidence of witnesses, exhibits relied on etc. The disposition of each factual issue may require a discussion of and findings of credibility of witnesses and/or influences to be drawn from non-contentious facts and documents. [[18]](#footnote-18)

*Issues*; Set out the material issues and main arguments on each side. Take care to ensure that you have summarized the principle submission of the unsuccessful party, in order to demonstrate that you have understood them and taken them to account.[[19]](#footnote-19) Where a party is not represented, the court should formulate issues that will address the dispute from the evidence in place. In respect of criminal cases, Niki Tobi JSC (as he then was) stated that the burden of proof in a criminal matter is on the prosecution.[[20]](#footnote-20) The judge should set out the ingredients of the offence and raise issues for determination.

The next stage is *applying the law to the facts*. The legal principles will be applied to resolve the issues raised. The judge should research and apply relevant case laws and principles that will support and sustain the decision. The magistrate will apply the law in line with the relevant evidence, documents in support of the case, witness statement, physical evidence and expert testimonies before the Court. Here the court will equally apply judicial precedent in the bid to resolving the dispute. Per Agbo JCA stated that the primary function of the parties in a trial is to place the facts before the Court while it is the duty of court to apply the law to the facts.[[21]](#footnote-21)

*Reasoning:* This is the segment that deals with examination, interpretation and application of the law to the facts in issue. It also applies the law to the argument from all sides/for and against. This is also where the judge states the reason for his final decision. In the words of Chief Justice Mukharji -

“The supreme requirement of a good judgment is reason. Judgment is of value on the strength of its reason. The weight of judgment, its binding character or its persuasive character depends on the presentation and articulation of reason. Reason therefore, is the soul and spirit of a good judgment”. [[22]](#footnote-22)

Failure of a Court to give reason for his judgment is a ground for allowing an appeal against the judgment. In the case of AGBANELO V U.B.N per Karibi-Whyte JSC( as he then was) stated that it is elementary and essential ingredient of a judicial function that reasons are to be given for decisions.[[23]](#footnote-23)

**End:** This contains the verdict/ holding of the court. The end must state the final Order of the Court. This is where the judge makes his final pronouncement on a case before it. This will comprises of the decision in favour or against the party. In civil cases, the judge will pronounce if a party is liable or not. It will further state the award if a party is successful. In criminal case, the court gives his verdict on whether the defendant is guilty or not guilty. Where the defendant is not guilty, the judge will acquit and discharge the defendant. Where the defendant is pronounced guilty, he is given an opportunity to make a statement or address the court which is the Allocutus. After the Allocutus, the defendant is sentenced. Finally, after the order, the judge must sign his signature, name of judge, designation of the judge and date. This displays the end of the judgment writing.

**Final checks**

Before a judge signs off, and judgment is read in court, the judge should take out time to reread the judgment, check spellings and punctuations. Where there is any error, make corrections. The judge should check if he has addressed all the issues , made factual findings, explained why he arrived at the said conclusion and finally whether the parties will understand the judgment.

*SLIP RULE* :

This is a rule that enables a judge to correct clerical errors or accidental mistake in judgment or orders. It ensures that the final decision reflects the true intention of the judge. However, the moment the mistake exceeds the entire proceeding and goes to the root of the decision; it is neither accidental slip nor omission.

**STYLE OF JUDGEMENT**

Individual judges have different ways of writing judgments and there are wide variations in style. As pointed out by Murray Gleeson;

“there is no single correct mode of writing a judgment. However, there are techniques and strategies that Judges can employ to ensure that their judgment writing is clear as possible. Judgment writing is thus crucial in performance of judicial function as this is the way a judge communicate his reasoning in any given case. Writing good judgment therefore goes to the very foundation of performance of a Judge”. [[24]](#footnote-24) What is important in judgment writing is not so much style but the lucidity that one adopts. [[25]](#footnote-25)

You must cultivate a style (that) commands attention. No matter how sound your reasoning, if it is presented in a dull and turgid setting, your hearers or your readers will turn aside. They will not stop and listen. They will flick over the pages. But if it is presented in a lively and attractive setting, they will sit up and take notice. They will listen as if spell bound, they will read you with engrossment. [[26]](#footnote-26)

When choosing a style to adopt, we should bear in mind the audience which would include the Litigant. The litigants make up the parties in the suit and we must write in a way that litigant will understand. The wider audience will include:

(1) **The legal profession:** This will involve the lawyers to the litigants who represented them, other lawyers present in court or that may have access to the judgment.

(2) **The Judges:** Judges of co-ordinate jurisdiction who might want to refer to it because it is similar to what they have. It will also be for the judges who sit on appeals.

(3) **The academics** also read the judgment to improve on the knowledge of law or for lecture purposes.

(4) **The press:** The press is not left out. The press in its reporting conveys the relevant information to a far larger audience. [[27]](#footnote-27)

**Guidelines to a successful judgment**

1. Eliminate unnecessary words: A judgment should eliminate excess words to enhance clarity and precision. Use of long sentences should be discouraged.
2. Be succinct and direct: We should avoid rambling. It is also very necessary to use few authorities, if such authorities will support the point made. It is useless to write a judgment that is vague and ambiguous yet voluminous. Flooding your judgment with numerous authorities on same issue will not show how clever you are nor attract an award.
3. **Use plain language:** The world is moving towards plain language. There is a gradual abandonment of Latin in present time in our text and spoken language. You must write to the understanding of everyone. We should avoid Latin phrases as much as possible or provide an interpretation. Some of us write judgments and at the end of the day litigant will retain a new lawyer to interpret what is written.
4. **Avoid use of clichés and jargon:** You should also eschew jargon, slangs and cliché. Jargon consists of special vocabulary used by a profession or group which is usually not used or understood by outsiders. [[28]](#footnote-28)

We should avoid repetition of words that mean same thing. For example “completely and totally agree with you”.

**Problems in judgment writing**

1. Wordiness
2. Lack of precision and clarity
3. Poor organization
4. Cryptic analysis
5. Pomposity and humour

**Conclusion**

In summary, the art of judgcraft is one that every judge should imbibe and be proud of in detailing their judgment on any matter. It must contain all relevant elements that transpired during the hearing while articulately conveying the final decision on the matter. It must be clear without ambiquity, vagueness or unnecessary cryptic analysis. It must be concise-easily understood and convey the thoughts and decisions of the court, demeanor of the parties where relevant, questions of law and facts which were relied on in judgment. It should be correct and accurate –detailing correct laws, precedents, judgments and updated guidelines which form the basis of the judgment. These simple yet thoroughly lighted paths will guide the judgments to be one you can all be proud of in our noble profession.

Once again, I would like to say thank you for this opportunity and I hope this paper has improved our knowledge on judgecraft and judgment writing.

1. Judge Malcolm Simon describes judgecraft [↑](#footnote-ref-1)
2. Quoted in judicial committee on continuing Education (1991:99) [↑](#footnote-ref-2)
3. Guide to judicial conduct (March 2013) [↑](#footnote-ref-3)
4. Lord Stephens Creevyloughghare ;2023 “judgment writing and Judgcraft; A view from the supreme court” in Irish Judicial studies journal vol.7(2) p. 117 [↑](#footnote-ref-4)
5. 1999 Constitution of the Federal Republic of Nigeria 7th Schedule [↑](#footnote-ref-5)
6. (2021) LPELR -55338 (SC) [↑](#footnote-ref-6)
7. Held in the case of R v Chancellor of the university of Cambridge (1723)93 ER 698 @704 or (1723)1 str 557 [↑](#footnote-ref-7)
8. Lord Stephens Creevyloughghare ;2023 “judgment writing and Judgcraft p118 [↑](#footnote-ref-8)
9. Hon. Justice Nnaemeka Agu JSC in a paper delivered 2009 “ Judgment Writing Induction Course Lecture for newly appointed Judges and Khadis” p.81 [↑](#footnote-ref-9)
10. Robert Leflar, some observations concerning judicial opinion 61 colum .L. Rev 810,813 (1961) [↑](#footnote-ref-10)
11. T. Anderson: “The New Magistrate and the Lengthy Trial” in G. Briggs (Ed.) Judicial decision crafting clear reasons (2008) 4 [↑](#footnote-ref-11)
12. Andrew Goodman reading , writing and analyzing judgment p.137 [↑](#footnote-ref-12)
13. Andrew Goodman reading , writing and analyzing judgment p.137 [↑](#footnote-ref-13)
14. Danladi v Dangiri &ors (2014 ) LPELR-24020(SC) [↑](#footnote-ref-14)
15. C. Holmes in G. Briggs (Ed.) Judicial decision crafting clear reasons (2008) 4

 [↑](#footnote-ref-15)
16. Hon. Justice Rowland Ahiakwo in Judgment and judgment writing in plain English p. 138 [↑](#footnote-ref-16)
17. Ibid [↑](#footnote-ref-17)
18. A guide for Magistrate in Commonwealth: Fundamental Principles and Recommended Practices p.103 [↑](#footnote-ref-18)
19. Andrew Goodman –Reading , writing and Analyzing judgments p.145 [↑](#footnote-ref-19)
20. Abubakar Tijani Shehu v State (2010) 2-3 SC PT1. P.180. [↑](#footnote-ref-20)
21. Multi –pro Enterprises Ltd v Tijani (2021)LPELR 55784 (CA) [↑](#footnote-ref-21)
22. Justice T.S. Sivagnanam in a paper delivered on the 11th of April 2010 titled “The salient features of art of writing orders and judgment” at Tamil Nadu State Judicial Academy. [↑](#footnote-ref-22)
23. (2007)7 NWLR (PT 666)534@557 [↑](#footnote-ref-23)
24. Lord Denning, (1982) The family story 216 [↑](#footnote-ref-24)
25. S. Sandile Ngcobo Justice of the Constitutional Court “Judgment Writing” [↑](#footnote-ref-25)
26. Lord Denning, the family stories 216 (1982) cited by Lord Stephens of Creevyloughagre – judgment writing and judgment craft a view from the Supreme Court. [↑](#footnote-ref-26)
27. Michael Beloff: “Judges and Journalist uncomfortable bedfellows” Journal of Commonwealth Magistrates’ and Judges’ Association Vol. 21 No. 3 June 2014. p 21 [↑](#footnote-ref-27)
28. Hon. Justice Sir Roland Ahiakwo; judging and judgment writing in plain English published 2009, p. 405 [↑](#footnote-ref-28)