International Journal of
Development Strategies in Humanities, Management and Social Sciences
p-ISSN: 2360-9036 | e-ISSN: 2360-9044
IJDSHMSS
November, 2023
Vol. 13, No. 2

Determination of Petroleum Employee Employment Whether Covered by the Petroleum Industry Act 2021 and the Guidelines for the Release of Staff in the Nigeria Oil and Gas Industry: A Review of SPDC V Minister of Petroleum Resources & 2 ORS Suit No.: NICN/ABJ/178/2022

[1]Samson Atari Namo &
[2]Thankgod Okeokwo
[1&2]Faculty of Law,
Federal University Wukari,
Taraba State

Article DOI:
10.48028/iiprds/ijdshmss.v13.i2.16

Abstract

The peculiarities with employment in the Nigerian Oil and Gas Industry is underlined by the Guideline for the Release of Staff in Nigeria Oil and Gas Industry which is based on Regulations 15A made by the Minister of Petroleum under his powers pursuant to section 9 of the Petroleum Act and section 3 of the Petroleum Industry Act 2021. Both the Guideline and the Regulations thereto have generated two contradictory decisions of Court in PENGASSAN case and those between SPDC v Minister of Petroleum. The doctrine of stares decisis was deployed in answering the questions that agitated the mind of the writer on the case of SPDC. Doctrinal method was used in consulting primary and secondary materials. It was found that the doctrine of stares decisis though made to protect the integrity of court does not hold in an unjust and unreasonable circumstance moreso as the Courts involved are of concurrent jurisdiction. It was further found that decisions reached on the Petroleum Industry Act cannot be said to have been reached per incuriam. The recommendation is the option of appeal on the matter would rest the issues.

Keywords:
Staff, Employment, Oil, Gas, Industry

Corresponding Author:
Samson Atari Namo

Background to the Study

Employment Agreement is an agreement binding between a worker called employee and an owner of the work called employer to do for fees agreed or to be agreed a particular job for which salaries or wages is or will be paid. There are those employed for works not regulated by law while others have their job covered or governed by law in the particular sector, they are employed in the economy whether private or public. Laws can regulate the relationship of a worker and his employer even if the work is to be done by a private person and the person saddled with the payment of salaries is another private person. This is to ensure checks on return to slavery in the guise of employment. The Guidelines for the Release of Staff in the Nigeria Oil and Gas Industry (the Guideline) is one of such laws in the form of a regulation made pursuant to an existing law (Petroleum Act 1969) enacted to regulate how persons employed in the petroleum industry should be relieved of their jobs.

The Guideline provided for how a person employed under any form as worker in the petroleum industry should have his/her employment determined. Basically, the Guideline is to the effect that before a person should be sacked or released from their employment in the petroleum industry, the employer shall obtain consent of the Minister of Petroleum before such release can be effective on such employee. But in the PENGASSAN case, it was held that the Guideline was not null and void being made under a non-existent section 9 of the Petroleum Act 1959. The effect of the yet to be appealed decision in PENGASSAN case is that the Guideline does not exist in law because a Regulation must be based on express or implied powers conferred on an agency by law to be valid. The Court in PENGASSAN case declared that the Guideline does not exist in law and therefore null and void. However, in the SPDC v Minister of Petroleum Resources case under review, the Court held to the effect that the Guideline is existent and applicable in the case for the advent of the Petroleum Industry Act (PIA) 2021. The focus of this review therefore, is to ascertain on what basis the Court held this view, whether the view is sound in view of case laws and scholarly jurisprudence on the issue and to recommend the way forward.

Conceptual Framework

Employment in the Oil and Gas Industry

Petroleum industry employment matters are unique and exist as a class of its own being a regulated sector of the Nigerian economy. The Guideline for release of staff of the petroleum industry is said to be applicable under the PIA 2021 for the reasons posited by the Court in the case of SPDC v Minister of Petroleum Resources being Regulations made pursuant to the repealed Petroleum Act. This is an isolated case from the conventional employment matters where a person who hires has the powers to fire at will in line with the terms of the employment. The concept of employment here is the kind which is regulated by a particular law, regulation or guideline applicable in the oil and gas industry intended to protect Nigerians from indiscriminate termination by the operators of the oil and gas sector in defiance to existing guideline merely on the grounds that they have complied with the terms of engagement with the particular staff.

The Concept of Cause of Action

A cause of action refers to the entire set of facts that gives rise to an enforceable claim, comprising of every fact which, if traversed, the Plaintiff must prove to entitle him to judgment. Cause of action consists of two elements: the wrongful act of the defendant which gives the plaintiff his cause of complaint; and the consequent damage.[1] The question of when a cause of action arose is as to when the facts constituting the right(s) allegedly violated is said to have been completed. When had the legal right to institute an action said to have arisen in the circumstances of a particular case. It follows therefore, that the accrual of a cause of action is one whereby a cause of action becomes complete so that the aggrieved party can begin and maintain his cause of action. A cause of action does not accrue or become due to the plaintiff at the date of judgment but by the time the action is filed in Court. And the law which applied at the time the act or omission complained occurred is the appropriate law.[2]

The Concept of Applicable Law to Cause of Action

The applicable law, in any proceeding, is the law in force at the time the cause of action arose and not the law at the time the jurisdiction of the Court was invoked. That to say, the applicable law to a cause of action is the law prevailing at the time the cause of action arose notwithstanding if the law had been revoked at the time the action is being tried. The law as at the time the letter conveying the fine to Shell was dated is one of the laws that should apply.[3]

Where there are causes which occurred over a period of time, the laws at those periods if they had not been repealed would apply. Even if they had been repealed, the extant law at the time of the cause would still apply. If the law at the time of the cause of action is repealed, and the cause becomes completed after a new law had come into place, the new law should apply as far as procedure is concerned. If the Petroleum Act for instance, had not been repealed but amended, the amendment which is made through Petroleum Industry Act 2021 should apply over SPDC v Minister for Petroleum Resources case.

The Theory of Stare Decisis

The stare decisis principle in law implied that a Court should follow the decision reached in previous case where the facts soot or fits a present set of facts before it. It means to stand by things decided. The applicability arises when a Court is faced with a set of facts, opinion or argument similar or closely related to issues, facts or argument had on another matter before another Court, the present Court ought to align with the previous Court.[4] This is a hallowed principle of Courts which allowed for consistency and certainty, or predictability of Court outcomes given a similar fact. But where the Courts are of same or similar jurisdiction, a later Court may decide not to abide by a decision of another Court

[1]Lagos State Bulk Purchase Corporation v Purification Techniques (Nig) Ltd (2013) 7 NWLR (Pt.1352)82,87.

[2]Egbe v Adefarasin (No.1) (1985) 1 NWLR (Pt.3) 549.

[3]Mustapha v Gov Lagos State (1987) 2 NWLR (Pt.58) 539.

[4] P.A Anyebe 'Doctrine of Stares Decisis in Nigeria: A Step to Conclusion' *Journal of Law, Policy and Globalization*(92)(2019)21-33.

which has same powers as it does. And where there are no higher decisions of a superior Court, the Court of coordinate jurisdiction may differ in their decisions or take a path of position other than those already offered by their coordinate. In 1833, Parker J. as one of the propounders of this doctrine had been quoted to have said in the case of Mirehouse v Rennel[5]

> *Our common law system consists in the applying to new combinations of circumstances those rules of law which we derive from legal principles and judicial precedent; and for the sake of attaining uniformity, consistency and certainty, we must apply those rules, where they are not plainly unreasonable and inconvenient, to all cases which arise; and we are not at liberty to reject them, and to abandon all analogy to them, in the those to which they have not yet been judicially applied, because we thing that the rules are not as convenient and reasonable as we ourselves could have devised.*

The essence of stares decisis therefore, was to create a system for judicial decisions to be followed where applicable circumstances present themselves which are not in themselves unreasonable and inconvenient to the case at hand. This doctrine teaches not to disturb what had been established by a Court in similar fact or circumstance. To invoke the doctrine, all that is required is that decision had been entered by Court on same or similar fact or facts; not that the reason or arguments are practically the same, it is unnecessary to enquire or determine as to what was the rationale of the earlier decision which is said to operate as stare decisis.[6] The stares decisis theory was adopted in this research because it explained in the exception that a Court can deviate from the decision of another Court if it considers it unreasonable to follow such decision.

Literature Review

Decisions of courts are supposed to guide and guard societal behaviours where and when the society views that decisions dished from the Courts as consistent with a particular principle or principles on certain issue. The court are usually weary of inconsistent decisions unless it considered any decision, especially those made by Courts of coordinate jurisdiction, as reached per incuriam against known laws and principles or in defence of national policy or in revolutionary era trying to lit novel areas of rights and obligations. In their work entitled "An X-ray of the Doctrine of Stare Decisis in Nigeria" Agwor and Igila[7] argued that the doctrine of stare decisis implied the acceptance of an officially decided or settled point or principle of law in cases which such principle or point was directly or necessarily involved and those who are bound by it should unless there are urgent or exceptional reasons.[8]

---

[5]*Mirehouse v Rennel* 1 Cl & Fin 527.

[6]*Wama Rao v Union of India* 1981 2 SCR 1.

[7]D.O.N Agwor and Ogorchukwu Igila 'An X-ray of the Doctrine of Stare Decisis in Nigeria' *International Journal of Business & Law Research* (2022)(10)(1) 98.

[8]Agwor, et al 98-104.

Anyebe[9] on stares decisis doctrine in Nigeria opined that it involves Court's choice to stand by a choice of another Court in what is known as precedent which engenders predictability of judicial outcomes and upholds the perceived integrity of the judicial process. The author furthers that the doctrine is one of policy and not inexorable command. It is flexible to correct what another Court of coordinate jurisdiction may perceive as erroneous decision or to adopt decisions to change circumstances. A deviation from precedent may seem a contradiction of the principles of certainty and predictability of judicial outcomes but it irony may lie in the correction of perceived injustice perpetrated by few advantaged individual or group against public policy or morality or order.

Burns[10] of the 19th century posited that stares decisis had had ancient origin from before 1584 where it was reported in Croke's that "Wherefore, upon the first argument it was adjudged for the defendant, for they said that those things which have been so often adjudicated ought to rest in peace". According to Thomas, the name Stare Decisis is taken from the Latin maxim, stare decisis et non quieta movere, which being translated means to stand by precedent and not to disturb what is settled. When a point of law had been solemnly and necessarily settled by the decision of a competent Court it does not require further enquiry into such settled principle or rule by same tribunal or those bound to follow its adjudications. It was laid on the foundation that "Precedents and rules must be followed unless flatly absurd or unjust; for though their reason be not obvious at first view, yet we owe such a deference to former times as not to suppose that they acted wholly without consideration;" but "if it be found a former decision is manifestly absurd or unjust, it is declared, not that such a sentence was bas law but that it was not law".[11] Therefore, a decision might be followed for a long time until it develop features that might be contrary to reason in assuming that it be followed when it is flatly unjust and unreasonable.

Owhor[12] held the view that employment in the oil and gas industry in Nigeria is no longer governed by the Guidelines made by DPR or its successor in title because of the pendency of the PENGASSAN case. The author argued that the cause of the action was the termination letter issued Olanitor and not the letter the letter of DPR. But this argument does not seem to resonate with the fact that Shell went to Court to challenge the letter written which, to this researcher, constituted in part the cause of action for Shell. The argument would have been the proper law to apply when a transaction on a cause of action crisscrosses more than one dispensation of laws as in this case, the Petroleum Act and the Petroleum Industry Act. Which of those would be the proper law applicable in the

[9]Anyebe, (n4)21-33.

[10]T. Burns, The Doctrine of Stare Decisis (Cornell Law Library, 1893)1-41.

[11]---I Blackstone's Commentaries, 69-70---

[12]V. Owhor, Did the Court validly resurrect the Guidelines for the Release of Staff in the Nigeria Oil and Gas Industry in *Shell Petroleum Development Company of Nigeria v Minister of Petroleum Resources & 2 Ors?* (SSKOHN NOTES, 2022)1-6 < www.sskohn.com .> accessed 13 August 2022.

circumstance? This was not answered hence the need to review the case by this research to proffer more insight and perspective to what had been argued by Vincent. Vincent in his work argued that the Court in SPDC case should have first determined the status of the Guidelines before determining the liability of the Claimant is at best foisting the Court to accept as binding the decision of a Court of similar jurisdiction. The author further argued that the Court in SPDC case would have declared the fine illegal being imposed under a non-existent Guideline. It is important to state that the fine was imposed at the life of Petroleum Industry Act which sections 3, 311, 312 gave life to the Minister's proxy for the Guidelines not repealed. It is posited that as between Shell and its employee there may not be Staff Release Guideline but as between the DPR and its fine against Shell there was law validly in place. He argued that the Court in SPDC was in grave error when it held that the PIA saved the invalidated Guidelines by section 3. His position was that since section 9 of the Petroleum Act did not provide for employment as part of what the Minister can make regulations on, the exercise of the Minister's powers to the extent of employment in the Oil and Gas Industry was ultra vires and therefore invalid. The author concluded that since section 9 of the Petroleum Act did not provide for employment in the oil and gas industry it was wrong for the Court in SPDC case to hold that sections 3 & 311 of the PIA saved the guideline.

Petroleum Employee Employment Whether Covered by the Petroleum Industry Act (PIA) 2021 and the Guidelines for the Release of Staff in the Nigeria Oil and Gas Industry

The Hon. Kanyip J, on Thursday 22 July 2022, held in the case of Shell Petroleum Development Company v Minister of Petroleum Resources that the Petroleum Industry Act 2021 had taken over the Guideline for the Release of Staff in the Nigeria Oil and Gas Industry. According to the Court, the guideline on the release of Staff in the oil and gas industry was within the powers of the Minister and functions of the Nigerian Upstream Petroleum Regulatory Commission thus applicable. This position of the Court is obviously contrary to an earlier decision reached by a Court of similar powers per Hon. Oji in Suit No:- NICN/LA/411/2020 Petroleum and Natural Gas Senior Staff Association of Nigeria (PENGASSAN) & 3 Ors v Chevron Nigeria Limited[13] where the Court held that the Minister of Petroleum did not have the powers it conferred on itself in promulgating Regulation 15A of the Petroleum (Drilling and Production) Regulations 1969 as amended which was the basis on which the Department of Petroleum Resources (DPR) now taken over by Nigerian Upstream Petroleum Regulatory Commission (the Commission) made the contested Guidelines for the Release of Staff in the Nigeria Oil and Gas Industry 2019.

Facts of the Case

Shell Petroleum Development Company terminated one of its staff named Gbenuade Joko Olanitori who petitioned the Department of Petroleum Resources (DPR). DPR is now run by the Nigerian Upstream Petroleum Regulatory Commission by virtue of section 312 (1) of the Petroleum Industry Act 2021.[14] The petition was on the grounds that

[13] (2021)unreported.

[14] Sections 312(1) & 311 (1), (9) (a) PIA 2021.

the permission of the Minister was not obtained in line with the extant regulations governing the employment. But Shell responded that it terminated the employment under extant contract between it and the petitioner and that the Guideline did not apply in that case. Based on the representation by Shell and relying on its powers under its Guidelines, the DPR wrote to Shell, imposing a fine of $250,000 US dollars for Shell's failure to seek and obtain Minister's approval prior to the determination of the petitioner's employment being an employment governed by the Guideline.

Shell being dissatisfied with the position taken by DPR, instituted an action at National Industrial Court as Claimant against the Minister of Petroleum Resources and 2 others challenging DPR's powers to impose the fine of $250,000. And questioning the validity of the Guideline in the face of a subsisting National Industrial Court judgment delivered earlier in 2021 in Petroleum and Natural Gas Senior Staff Association of Nigeria (PENGASSAN) & 3 Ors v Chevron Nigeria Limit. In their argument, Shell posited that the Supreme Court had decided in the case of SPDC v Nwaka that the Company did not need the approval of the Minister to release any of its staff if it complied with the terms of the employment. The Claimant greatest gross against the defendants were that the Petroleum Act under section 12 did not allow DPR to make Guidelines on the behalf of the Minister hence any such Guideline was not valid.

The Position of the Law on Stare Decisis

The law is long settled by section 287(4) of the 1999 Constitution to the effect that

> *The decisions of the Federal High Court, The National Industrial Court, a High Court and of all other Courts established by this Constitution shall be enforced in any part of the Federation by all authorities and persons, and by other Courts of law with subordinate jurisdiction to that of the Federal High Court, a High Court and these other Courts respectively.* [15]

Applying the literal rule of interpretation of statutes, one would need little efforts to argue that Industrial Courts are Courts of same or coordinate jurisdiction so that the decision of a division of Industrial Court does not bind the other. It can at best be persuasive but not binding on it since it is not an inferior Court to itself. This is so when a Court finds contrary persuasion on facts before it or finds the necessity of justice for the particular case before it or for innovative judicial activism for prosperous development of jurisprudence in a particular area of juridical need. For example, the Courts may wish to depart from earlier decisions on locus standi on environmental litigation or the applicability of the Guideline for the release of oil and gas staff.

Scholars like Frederick Schauer would argue that precedents traditionally look backwards to yesterday's decision but should of necessity look towards being tomorrow's precedent; that is "…yesterday's precedent in today's decisions. But … view today's decision as a precedent for tomorrow's decision makers."[16] This forward-looking

[15] S.287(4)CFRN 1999 as amended.

[16] F. Schauer 'Precedent' *Standford Law Review* (1986-7)(39)571-573.

attribute of precedent is what the Court in SPDC v Minister of Petroleum Resources would have relied on in deciding against the earlier decision of his learned brother that Guidelines on release of staff in the oil and gas sector was not binding on Shell. In his decision, he took forward precedent for tomorrow and leaned on protecting Nigerian employees at the oil and gas industry from the slave-master-like disposition of any multinational corporation in Nigeria.

The Correctness of Spdc V Minister of Petroleum Resources

Comparing from the stare decisis principle or doctrine one can safely argue that the judge was not wrong in deciding that the Shell violated the Guidelines for release of staff in oil and gas industry made by the DPR now the Commission and thus liable to pay the fine as imposed by the regulatory agency. The argument based on other decisions of the same Court is like beating a dead horse in so far as precedent is concerned as it applied to hierarchy of Courts in Nigeria. PENGASSAN case will not hold waters against facts found by the Court in SPDC v Minister's case for the reason that the Court is not bound by the decision of another of its kind.

The correctness of that decision could be viewed again in line with the constitutional provision under section 287(4)CFRN 1999 as amended to the effect that Court decisions binds persons to which those decisions were made. It follows that as far as Shell is concerned, the Guidelines made by the defunct DPR does not exist being nullified by the Court in PENGASSAN case. The binding nature of that decision on Shell needs judicial interpretation based on the position taken in the SPDC v Minister's case under review. Shell as a body under the Nigerian law has decision from Court that fits what it did with its employee on the grounds that the contract between Shell and its employees were the only document to consider when determining employment of a staff in the oil and gas industry without recourse to the Minister or his agent.

Can one find any section of the Petroleum Industry Act (PIA) 2021 other than sections 311(1) and 312 (1) thereof to justify the position that the Guidelines was still subsisting being made pursuant to section 9 of the Petroleum Act 1969 LFN 2004. I think to the affirmative. For the avoidance of doubt section 311 (1) provides:

> *Any Act, subsidiary legislation or regulation, guideline, directive and order made under any principal legislation repealed or amended by this Act, shall, in so far as it is not inconsistent with this Act, continue in force mutatis mutandis as if they had been issued by the Commission or Authority under this Act until revoked or replaced by an amendment to this Act or by subsidiary legislation made under this Act and shall be deemed for all purposes to have been made under this Act.*

All regulations made under the Petroleum Act which was not repealed or amended was adopted as effective so far as it did not contravene any provision of the PIA 2021. An act or order issued by any agency that has been repealed by the PIA if such order subsist or is not contrary to the PIA, the agency created under the PIA can legitimately enforce or ensure

the enforcement of such orders or instrument. In this also, the SPDC v Minister of Petroleum Resource is not faulted by this review. Where the position of the PIA supports the decision in SPDC v Minister of Petroleum Resources could be true that the decision was reached per incuriam only because the Court did not feel bound by the decision in PENGASSAN case? I think not. The Court in SPDC v Minister of Petroleum took a position based on recent legislation bordering the administration of the oil and gas industry in Nigeria. This position of the Court can and should be adjudge a policy statement classifying determination of employment in the oil and gas industry to be subject to obtaining written consent from the Minister of Petroleum and not merely based on the contractual relationship between the multinational company and their employee.

The other argument is whether section 3(1)(i) of the Petroleum Industry Act 2021 amended section 12 of the Petroleum Act to validate the Guideline for release of Staff of Oil and Gas Industry made for the Minister by the defunct DPR. To ascertain this, one would have to enquire into what constituted the cause of action of the Claimant. From the facts before that Court, the Claimant terminated the employment of one of its staff on 2nd June 2021; the staff whose employment with the Claimant was terminated wrote a complaint to the DPR and DPR investigated the matter and came up with a letter dated 28th January 2022 imposing 250,000 US Dollars fine on the Claimant who felt aggrieved and approached the Court. If the DPR had not written the letter of 28th January 2022, the Claimant may not have been in Court. Therefore, the Claimant's gross was the letter of 28th January 2022. The letter imposing the fine which gave rise to the action was written when the PIA 2021 had taken effect. Whether the PIA should apply is a matter settled by section 311 of the PIA. I have quoted earlier subsection 1 of section 311 of the Petroleum Industry Act to the effect that any Act, Legislation or Regulation or anything made by them which does not contradict the PIA is in force as though made under the PIA.

Proper interpretation to section 3(1)(i) of the Petroleum Industry Act 2021 as against section 12 of the amended Petroleum Act, would be that section 3(1)(i) had amended section 12 leaving the DPR with the powers to make regulations or guideline for the Minister and thus validating the letter of 28th January 2022 on the basis of both Acts.

What has not been laid to rest is the significance of subsisting decision of a Court of competent jurisdiction on a matter between parties and the organs of government and people in the federation. Section 287 of the Constitution says it binds all persons and body in the federation. So, was the Guideline for the Release of Staff in the Nigeria Oil and Gas Industry made pursuant to Regulations 15A of the Petroleum (Drilling and Production) Regulations 1969 valid? For my Lord Hon. Oji, the answer is in the negative as he posited in Suit No:- NICN/LA/411/202 Petroleum and Natural Gas Senior Staff Association of Nigeria (PEGASSAN) & 3 ors v Chevron Nigeria Limited. For that Court the Minister was ultra vires his powers when he made Regulations 15A. By virtue of that decision of PENGASSAN was the Regulations 15A and the Guidelines made thereunto invalid. The Court in PENGASSAN case answered in the affirmative. In the mine of Shell, as a body subject to Nigerian law, there was not Guidelines on Release of Staff in the Nigeria Oil and Gas Industry as at 2nd June 2021 when it wrote its staff terminating employment.

If Shell mind was right in its thought and the decision in SPDC v Minister of Petroleum Resources turned out the way it did; then Shell must have been a victim of a twixt in stares decisis not on its negligence or lack of due diligence. The Court in SPDC case was not bound by the decision in PENGASSAN case. There was new sheriff in town-PIA 2021 which provided for the grounds on which the Court in SPDC case felt it unjust and unreasonable to follow its earlier decision in PENGASSAN case.

Conclusion/Recommendation

Following the doctrine of stare decisis it would be strange in the view of this paper to argue that the SPDC v Minister of Petroleum Resources & ors was reached per incuriam or contrary to the principles of judicial precedent which is strengthened by the doctrine of stare decisis. The Industrial Court in SPDC v Minister of Petroleum Resource may be wrong but this writer is not in doubt that the Court, in that case, did not violate any known principles of law as to following precedents or abiding by the doctrines of stare decisis. The law and facts presented itself to the decision reached in SPDC case and I dare say no reasonable tribunal would have done otherwise. An appeal to the Court of Appeal can put paid on this matter for the good of both the regulators and the operators in the oil and gas industry in Nigeria as concerning release of staff.

Bibliography

Statute

Petroleum Industry Act 2021

Constitution of the Federal Republic of Nigeria 1999 as amended

Case Law

Lagos State Bulk Purchase Corporation v Purification Techniques (Nig) Ltd (2013). 7 NWLR (Pt.1352)82,87.

Egbe v Adefarasin (No.1) (1985) 1 NWLR (Pt.3) 549.

Mustapha v Gov Lagos State (1987) 2 NWLR (Pt.58) 539.

Mirehouse v Rennel 1 Cl & Fin 527.

Wama Rao v Union of India 1981 2 SCR 1.

Book

Burns, T. The Doctrine of Stare Decisis (Cornell Law Library, 1893)1-41.

Schauer, F. 'Precedent' Standford Law Review (1986-7) (39)571-573.

Journal

Anyebe, P. A 'Doctrine of Stares Decisis in Nigeria: A Step to Conclusion' Journal of Law, Policy and Globalization (92) (2019)21-33.

Agwor, D.O.N & Ogorchukwu I. 'An X-ray of the Doctrine of Stare Decisis in Nigeria' International Journal of Business & Law Research (2022) (10)(1) 98.

Owhor, V. Did the Court validly resurrect the guidelines for the release of staff in the Nigeria Oil and gas industry in shell petroleum Development Company of Nigeria v Minister of Petroleum Resources & 2 Ors? (SSKOHN NOTES, 2022)1-6