

IN THE HIGH COURT OF JUSTICE, ONDO STATE OF NIGERIA
IN THE IDANRE JUDICIAL DIVISION
HOLDEN AT IDANRE

SUIT NO: HCID/5/CIV/2025

BETWEEN:

- | | | |
|---|---|------------------------|
| 1. MR. AKINNAYAJO IGBEKELE AKINOLA | } | CLAIMANTS |
| 2. MR. AKINNAYAJO OLAWOLE OLATUNBOSUN
<i>(For themselves and on behalf of the entire
Family of Late Chief Sara Akinnayajo)</i> | | |

AND

MRS. AKINSULIRE JUMOKE (A.K.A YELLOW SISI) DEFENDANT

CLAIMANTS' REPLY TO THE STATEMENT OF DEFENCE AND DEFENCE TO COUNTER-CLAIM

1. In answer to paragraph 3 of the Statement of Defence, the Claimants state that it is the Claimants' family cocoa farmland that was allegedly/purportedly sold to the plaintiff. Late Mr. Ibukun Akinnayajo's own cocoa farmland that was given by the family to the stock of his mother (Julianna Adeate) is being managed by his wife and children.
2. The Claimants deny paragraph 4 of the Statement of Defence as state That the boundary of the Claimants' family cocoa farmland land lying, situate and being at Ajegunle Arun Camp, Idanre Local Government Area of Ondo State as described by the defendant is incorrect. The boundaries are as follows:

By the right side - Ibukun Akinnayajo's Cocoa Farmland
By the left side - Abayo's Cocoa Farmland
By the back side - Akinrinlade Eric's Cocoa Farmland
By the front side - Akinsote Ajoke's cocoa farmland
3. In answer to paragraphs 6 and 7 of the statement of defendant, the Claimants state that it is the same cocoa farmland that the Claimants' family lease to Mr. Erick Akinrinlade that the Defendant is trespassing on. The Defendant cannot purchase the Claimants' family cocoa farmland from Late Mr. Ibukun Akinnayajo as far back as 2018. The Defendant is put to the strictest proof thereof.
4. In answer to paragraphs 8 and 9 of the Statement of Defence, the Claimants state that the 2nd Claimant does not know the Defendant's purported cocoa farmland and he never sent any alleged hoodlums to forcibly enter any farm. The Defendant is put to the strictest proof thereof.

DEFENCE TO COUNTER-CLAIM

5. In answer to paragraph 22 of the counter-claim, the Claimants/Defendants to counter-claim states that the Claimants do not know the occupation of the Defendant and where she works. She is put to the strictest proof thereof.

6. The Claimants/Defendants to counter-claim deny paragraphs 23 and 24 of the counter-claim and state that the cocoa farmland described by the Defendant is unknown to the Claimants. The Claimants' family cocoa farmland in the statement of claim are bounded as follows:

By the right side - Ibukun Akinrayajo's Cocoa Farmland

By the left side - Abayo's Cocoa Farmland

By the back side - Akinrinlade Eric's Cocoa Farmland

By the front side - Akinsote Ajoke's cocoa farmland

7. In answer to paragraph 25 of the Statement of Defence and Counter-claim, the Claimants state that the cocoa farmland which the Defendant trespassed upon never belonged to Late Ibukun Akinrayajo as same belonged to the entire family of Late Sara Akinrayajo. Therefore Late Ibukun Akinrayajo cannot allegedly sell the entire family cocoa farmland to the Defendant.
8. The Claimants deny paragraphs 26 and 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37 of the Counter-claim and put the Defendant to strictest proof thereof.
9. The Claimants deny paragraphs 38, 39, 40 and 41 of the Counter-claim as state that the Claimants did not at any point in time forcibly enter any cocoa farmland that allegedly belong to the Defendant nor steal purported cocoa beans therefrom. Rather it was the Defendant that trespassed on the Claimants family cocoa farmland. The Defendant is put to the strictest proof thereof.
10. The Claimants deny paragraphs 42, 43, 44 and 45 of the Counter-claim and put the Defendant to the strictest proof thereof.
11. The Claimants urge the court to dismiss the Counter-claim of the Defendant as same is baseless, unmeritorious, frivolous and an abuse of Court process with substantial court.

Dated this 5th day of May, 2025.



A handwritten signature in black ink, appearing to be 'Adelanke Akinrata', written over a horizontal line.

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