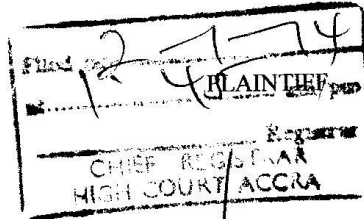


IN THE SUPERIOR COURT OF JUDICATURE  
IN THE HIGH COURT OF JUSTICE  
FAST TRACK DIVISION  
ACCRA –AD 2013

SUIT NO. AP.159/2013

BETWEEN:

MARTIN A. B. K. AMIDU  
(FORMER ATTORNEY GENERAL)  
355 NORTH LEGON RESIDENTIAL AREA  
ACCRA



AND

THE ATTORNEY GENERAL  
ATTORNEY GENERAL'S DEPARTMENT  
MINISTRIES  
ACCRA

DEFENDANT

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**APPLICATION FOR DIRECTIONS**

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TAKE NOTICE THAT ON Thurs the 16<sup>th</sup> day of Jan 2014, this Honourable Court shall be moved by the Plaintiff or his Counsel praying for directions in this suit.

In particular, the Plaintiff or his Counsel pray the Court that the following orders be made:

1. That the issues for determination in this suit be as follows:
  - (a) Whether or not on 18<sup>th</sup> January 2012 the Defendant sent a member of the Council of State to the Plaintiff to demand on pain of consequences the withdrawal of the press statement issued by the Plaintiff on 11<sup>th</sup> January 2012 because it tended to bring the government into disrepute.
  - (b) Whether or not the purported termination of the contract of employment of the Plaintiff with immediate effect on 19<sup>th</sup> January 2012 for the specified

ground of dismissal for misconduct without any hearing of a charge of misconduct was not in breach of contract and the 1992 Constitution.

- (c) Whether or not the withdrawal of all facilities with immediate effect from the Plaintiff, including official vehicle, driver, mobile phone, access to the office and barring the Plaintiff from handing over to his successor was not in breach of the contract of employment.
- (d) Whether or not the Plaintiff is entitled to payment for cost of transport from 20<sup>th</sup> January 2012 to 30<sup>th</sup> April 2012 (the three months period in lieu of notice) inclusive of the cost for a driver with interest thereon.
- (e) Whether or not the Plaintiff is entitled to an order for the payment of his salary for the month of April 2012 as admitted by the Defendant together with interest thereon.
- (f) Whether or not the Plaintiff is entitled to an order for the payment of his terminal benefits in accordance with the contract as amended by the Article 71 Committee of the 1992 Constitution appointed by the Defendants as admitted by the Defendant with accruing interest thereon.
- (g) Whether or not the Plaintiff was not entitled to the allocation of one official vehicle to be paid for by the Plaintiff pursuant to the contract of employment as amended by the Article 71 Committee of the 1992 Constitution.
- (h) Whether or not the Plaintiff is entitled to an order for the payment of 20% of basic salary in lieu of accommodation from 1<sup>st</sup> October 2011 to 30<sup>th</sup> April 2012 as admitted by the Defendant together with accruing interest thereon for each month of default.
- (i) Whether or not the Plaintiff is entitled to an order for payment for earned annual leave not approved to be taken during the contract period as admitted by the Defendant with interest thereon.
- (j) Whether or not the Plaintiff is entitled to damages for breach of his said contract of employment with the Defendant.
- (k) Whether or not the Court should not make an order or give directions for accounts and inquiries to be made on the emoluments the Plaintiff was entitled based on increases in emoluments effected by Government pursuant to the Article 71 Committee's recommendations for the purposes of a fair determination of the issues for trial in this case.

- (1) Any other issues arising out of the pleadings.
2. That a very short date be fixed for the hearing of this matter.
3. That the mode of the trial be both oral and documentary evidence.
4. That the length of the trial be three (3) days.
5. That the cost of this application and any other cost to be awarded in this matter be cost in the cause with liberty to apply.
6. Any other order which in the view of the Court would ensure a speedy, effective and less expensive trial of this matter.

**DATED AT ACCRA THIS 27<sup>TH</sup> DAY OF DECEMBER 2013**

  
MARTIN A. B. K. AMIDU  
(PLAINTIFF)

THE REGISTRAR  
HIGH COURT (FAST TRACK DIVISION)  
ACCRA

AND TO THE ABOVE-NAMED DEFENDANT, THE ATTORNEY GENERAL,  
ATTORNEY GENERAL'S DEPARTMENT, ACCRA