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EFFECTIVE LAW REPORTING IN NIGERIA IN THE NEW MILLENNIUM

BY

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EVOLUTION OF LAW REPORTING IN NIGERIA

History of Law Reporting in Nigeria.

Nigeria Law reports are report of cases decided by Nigerian courts. Cases reported in these reports are decisions of the superior courts, e.g. Supreme Court, Court of Appeal and High Courts. Decisions of the magistrate courts and customary courts are not reported.

Nigerian law reports may be broadly grouped into two classes: Official reports and private reports.

Official Reports, comprise of government and court sponsored reports; some of these are Federal in coverage and some localised to the states.¹ Private reports on the other hand are those published by private individuals or publishing houses.

Official reports

These commenced in 1910 with the publication of the Law report (Colonial) Nigeria.

(i) The Law Report (Colonial) Nigeria.

This is a one volume work containing a few judgment of Mr. Justice J. S. Smith sitting in Admiralty courts of full court of Appeal between 1884 and 1892. This work published in 1911 by the colonial government is about the first law report to be published for the country.² The series is cited in the form LRN (Colonial).

(ii) Nigeria Law Report

The history of systematic law reporting in Nigeria dates back to 1916 when the publication of the Nigerian Law Report under the official sponsorship of the Judicial Department was commenced.

¹ Bankole, S.B. Law reporting in Nigerian, p. 4. Being paper presented at the 3rd Course in Law library Services at the Institute of Advanced Legal Studies, Lagos, on 3rd May, 1991

² Bankole, S.B.. *ibid*.

The series contain some of the more important decisions of the old Supreme court of Nigeria, decisions of the divisional courts of the Supreme Court, decisions of the former protectorate High court and few decisions of the Privy Council given in cases on appeal from Nigerian. The decision reported in the series was given during the period about 1881 and 1955. The series was published by the government of Nigeria. It consists of twenty-one volumes of reports and one volume of index. The series is cited in the form, '12NLR' meaning Vol. 12 of the Nigerian Law Report.

The report has been reprinted and bound into 5 volumes by the Crown Agent on behalf of the government of Nigeria.

(iii) **Selected Judgments of West African court of Appeal**

In 1933, the jurisdiction of the West African Court of Appeal was extended to Nigeria and from then until 1955, the court published in 15 volumes a series of selected judgments given on appeal from the supreme

Court of Nigeria, Gold Coast (now Ghana) Sierra Leone and Gambia. (All British West African territories). Some of the volumes were published by government of Nigeria, others by court of Gold Coast and some others by the Crown Agents for overseas governments and administrations in England on behalf of the government of Nigeria; the Gold Coast, Sierra Leone and Gambia. The series is cited as WACA.

(iv) **Federal Supreme Court of Nigeria Judgment**

When publications of WACA ceased on December 30, 1955, its place was taken by a series known as the Federal Supreme Court Judgments, which started publication in 1956. It comprises, five volumes, one for each year. The last of its volumes was published in 1960 and this is volume 5. There is also an index to these volumes. It is cited in the form '5 FSC' - The series were compiled by a justice of the court, J. Abbot and the Chief Registrar of the court.

States reports

When Nigeria became a federation in 1954, the need for more law reports arose. Each of the constituent regions in the Federation and the Federal territory of Lagos, each published its law reports.

(i) **Western Region of Nigeria Law Reports:**

The series contains report of case decided by the Federal Supreme Court, on appeal from the High Court of Western Region, and also decisions of the High Court of the Western Region. The series is cited as "1951 WRNLR..."

(ii) **Law Reports of the Eastern Region of Nigeria.**

The series contains reports of decisions of the Federal Supreme Court given on appeal from the High court of the Eastern region during the period 1956 to 1958 and the decisions of the High Court of the Region during the same period. Cases reported in the series are cited in the form, "ERLR..."

(iii) **Law Reports of the Northern Region of Federation of Nigeria**

This series contains reports of cases decided by the Federal Supreme Court during the period 1956 to 1961 on appeal from the High Court of Northern Region and cases decided during that period by the High Court of the Region. The publishers are not consistent in prescribing the mode of citation. For instance they state that the 1956 volume is to be cited as "1956 NRLR..." and the 1961 volume as "1961 NRNLR..."

Eastern Region reports were compiled by the judiciary, but the Northern and Western Regional reports were each prepared by a committee made of members of the bench, law officers and private legal practitioners.

On the country's attainment of independence, the nomenclature of the respective reports changed accordingly. In each case the word region was dropped and the reports became known as Eastern Nigerian Law Reports, Western Nigerian Law Report and Northern Nigeria Law Report respectively.

With the creation of states in 1976, we have the various states' High Courts publishing their law reports.

All Nigeria Law Reports

In 1961, the National commission on Law Reporting was inaugurated to publish the series known as the All Nigerian Law Report. The committee is made up of the Federal Attorney General as the Chairman, State Attorney Generals, the Registrar of the Supreme Court and two superior courts judges.

The series main contains decisions of the Federal Supreme Court now the Supreme Court of Nigeria as well as few judgments of the High Courts of the various jurisdiction in Nigeria as from 1961. There are two volumes for each year. The first volume containing decisions of the High court. The series is cited in the form "(1972) 1 ALL NLR (PART 2)..." and the second volume contains the decisions of the Supreme Court.

Supreme Court Judgments

There is also 'official' reporting in the sense of authoritative reports prepared and published by the court themselves, and these are; (i) Judgements of Supreme Court of Nigeria: The series started in 1972, and contains reports of decisions of the Supreme court given on appeal directly from the High Courts before 1976 and the decisions of appeals from Court of Appeal as from 1977.

The series consists of twelve volumes in a year, one for every month. It is published by the Supreme Court of Nigeria. It is cited as "(1982) 4 S. C..."

(ii) The Federal Court of Appeal report

The Federal Court of Appeal began publication of selected reports of its initial six divisions in 1977. The series are judgement of the various divisions of the Court of Appeal. It is published by the Court of Appeal Nigeria and it is monthly publication.

Other Courts

Both the Federal (Revenue) High Court and the National Industrial Court also publish reports of their decisions. The former is cited, FRCR / FHCN and the latter cited, NICLR.

Private Law reports

These are otherwise called commercial series.

After the attainment of independence precisely from 1964, there begun the ear of publication of law reports by sources other than official sponsored. This series started with the publication of Nigerian Monthly Law Report.

Nigerian Monthly Law Reports

The first private efforts of law reporting on commercial basis that is not officially sponsored took place in 1964, by a group of legal practitioners in Ibadan.

The series cover decisions of the Supreme Court and the High Court of all the states and the then Court of Appeal of the Western States. The coverage is more comprehensive than any other series and the editorial work is very carefully and efficiently carried out. This series started with publication of monthly issues for 1964. The series is now published annually. The series is cited as "(1971) INMLR.."

University of Ife law Reports;

The series started in 1971. It is quarterly report and reports selected cases from High Courts, Court of Appeal of the Western state and the Supreme Court cited as "UILR" published by the Law Faculty of the University of Ife now Obafemi Awolowo University.

Law Reports of Nigeria.

There are three volumes in this series and its coverage includes cases decided by the Supreme Court, Federal High Court and State High Court. It was edited by G.M. Onwucheka in 1980, the report was published by Butterworths (Nigeria) Lagos. It is cited as "LRN".

Evans Publishers Publications

- (1) Federation of Nigeria Law reports 1976 - This series has two volumes per year, coverage include cases of Supreme Court, Western State Court of Appeal and the High Court.
- (2) Ogun State Law Report 1973 - OGSLR covers selected judgments decided in the High Court of Ogun State cited 'OGSLR
- (3) Imo State Law Report 1977 - contains judgment of Imo State and that of Supreme Court which were on appeal from the state cited (Im.SLR).
- (4) High Court of Lagos State judgments 1978 - Contains judgments of Lagos State High Court cited CCHCJ.

Allan Milner of Oxford University introduced two specialised reports into Nigeria between 1969 and 1980. They are Nigerian Commercial Law Report cited NCLR and Nigeria Criminal Reports cited NCR. These series, concentrate on aspects of legal studies than on the level of jurisdiction of court. The two above mentioned reports belong to the African Law Report Series, the accompanying index to the Commercial Report covers table of cases, subject matter and table of legislation construed.

Explosion of commercial publishing of law reports did not effectively commence until the 1980s when legal journalism began to proliferate. Series that emerged as a result of this are Gani Fawehinmi Publications mainly:

The most sustained effort at law reporting by any private individual has been that of Gani Fawehinmi.

Under the editorship of Gani Fawehinmi are the following publications.

- (1) Nigerian constitutional Law Report 1982 - which covers constitutional cases decided in the High Court, court of Appeal and Supreme Court, cited NCLR.
- (2) Supreme court of Nigeria Reports - 1983. This series, from its title, one knows that it covers selected decisions of the supreme court only. cited SCNLR.
- (3) High Court of Nigeria Law Report - 1985. Coverage consists of judgment of Federal High Court and state high courts.

- (4) Nigeria weekly Law reports - 1985. Issues come out weekly. It covers judgments of the Supreme Court and the Court of Appeal.
- (5) S. M.I. Jegede in 1985 also had publications in three volumes of Nigerian Court of Appeal Reports cited NCAR covering reports of decisions of all court of Appeal divisions. There is also Nigerian Supreme Court cases - 1956 by Deji Sasegbon. At present there are 21 volumes and index in this law report. It is cited as NSCC.

Many of these mentioned various law reports have come on stream only to go under after a few editions. Most of these series commenced their existence and they ceased publication after a year or two.

There are over 40 current law reports circulating in Nigeria, published by either government or private law publishers presently.

Contemporary Trends in Law Reporting in Nigeria

Law reporting in Nigeria is over half a century old, but still it cannot be described as anything near perfect.

According to Coker JSC in Johnson V Lawanson
"Our system of law reporting in this country
is anything but perfect."

Law reports have a fitful existence in Nigeria. They rise and fall with great rapidity, their frequency is very unpredictable. Some even phase out of existence even before the lawyer or legal researcher makes up his mind to subscribe to them.

Official Reports

These are the Supreme Court Judgements Law Reports, the Court of Appeal Law Reports and the various High Court Law Reports.

These various reports of the courts are not regular, they fall into arrears. The Supreme Court Reports have ceased publications since March 1988, the last issue was in February 1988 only to resurrect in after over a decade. And all these various official reports do not write headnotes, and also there are no index for them.

³ Johnson V Lawanson (1971) NMLR 399

LAW REPORTS AS FROM 1980

Then came the 1980s, which is an era of explosion of private law reporting.

Private initiative in law reporting has been particularly effective beginning from this period, and there has been aggressive promotion of the various law reports by the private law reporters. The private law reporter seeks and carves out a niche where he can establish and distinguish himself. The reporting of the superior courts are all commercial undertakings, carried on for profit by these private law reporters as a result these reports are more regular, because more innovative presentation and format and their proprietors are more pushful in the promotion and sales. They would seek out users and not wait for them to call. They were widely accepted.

The justices and the judges have been encouraging, cooperative and helpful in making the courts judgements available to the private law reporters, because as the volume of business before the courts increased the need developed for the regular reporting of important decisions which should be published without delay.

This support was acknowledged by Chief Gani Fawehinmi in the preface to his digest of Supreme Court cases, these are his words; "I will like to place on record the wonderful cooperation we received from Hon. Mr. Justice George Sodeinde Sowemimo, the Chief of Nigeria. He ensured that we obtained all decisions we requested for. He ordered that all the Court's Guard Books of original judgments of the Supreme Court from 1956-1984 given to us for our examination, study and research. He made available to us Room 34 of the Supreme Court Extension for our use. I thank him for his major contribution in this regard. This facility was also extended to Deji Sasegbon when he was gathering materials for his law report - Nigerian Supreme Court cases.

Now there is a complete comprehensive report of all Supreme Court judgements by Deji Sasegbon. There are 21 volumes of this report including a detailed index, and it is current to 1990.

The most sustained effort of law reporting has been that of Gani Fawehinmi. His publications:

¹ Gani Fawehinmi, digest of Supreme Court Cases 1956-1984, vol.1 (Gen. Index) Preface in Nigeria, and these have continued to appear regularly which is unusual for a Nigeria Law Report.

Nigerian Constitution Reports;
Supreme Court of Nigeria Reports
Nigerian Weekly Law Reports
High Courts of Nigeria Law Reports

and some specialist series, and these have greatly boosted law reporting

Apart from Gani's publication which have been regular, there has been a plethora of private law reports in Nigeria, and many had a very checkered life, others very grossly in arrears, a few have managed to stay alive albeit unsteadily the so called monthly fall into quarterly or even cease for some time.

Some of these are the Nigerian Monthly Law Reports (NMLR) which started in 1964 and the latest issue was 1975. The University of Ife Law Report (UILR) first started publication in 1971 and the latest edition was 1976, and it was supposed to be a quarterly publication.

Law Report of Nigeria (LRN) by Onwucheka and Nigerian Court of Appeal Report by Jegede have both ceased.

At present, there are over thirty current law report circulating in Nigeria, published by either governments or private law publishers.

The advent of private law publishers to the field of law reports publishing has introduced considerable impetus and seriousness into a field which in past was characterized by an irregular and untimely released of reports from the court.

These are what some eminent law teachers and jurists have to say concerning our law reports and present law reporting in Nigeria.

Ibironke formerly of the Law School says,
"There were no law reports until Gani Fawehinmi came with the Nigerian Weekly Law Report. We hardly had any law report which does not come out until several years after the decisions. To be useful you have got to have access to it almost immediately it is delivered but when it is buried in several files in the courts, it is not useful."

Also Eso, J.S.C.(rd) in his valedictory speech to mark his retirement from the bench said on law reports, "The Supreme Court Law Reports are in serious

*Bankole B., *ibid*

*Ibironke (SAN) in Interview in the Lawfair Magazine, Magazine, May 2000

arrears, but I would like to pay public compliments to the Law reporters – Chief Gani Fawehinmi, Mr. Aluko-Olokun, and Deji Sassegbon. These law reporters have made the research of the justice easier. They have helped to enrich the law. More grease they say to their newsprints.

Setbacks to Effective Law Reporting in Nigeria

Even though considerable progress has been made in our law reporting systems generally, but the shortcoming in the system are still with us.

The following specific points in criticism of the present system of law reporting in the country may be made:

(1) **Speed and promptness:-**

Cases are still not promptly reported. There is commonly a gap of several months between the delivery of judgment in court and the publication of a judgment in a report. Most of the cases have fallen into arrears especially in the officially published reports. Even the private law reports report cases several months or years after they have been delivered.

The Nigerian Weekly Report (NWLRL) which series, report earliest any case is at least three weeks after it was delivered because there is no facility to make the judgements available as soon as they are delivered.

Today with so many radical changes in the law, it is necessary to know as soon as possible what the courts have decided, therefore speed is necessary in law reporting.

(2) **Multiplicity of Law Reports:**

Instead of having a good set of reports which all could consult, the members of the legal profession are compelled to take in several sets of reports in order to keep themselves fairly au courant with what was being decided in the various courts. The striking thing is that we find the same case reported again and again in substantially the same form in two or three of the different reports. This repetition is so general that it is not unusual for a case not to have been reported at least twice

⁶ Eso, J.S.C. (rd) Daily sketch, Friday, October 5, 1990.

For example, most case reported in the Nigerian Supreme Court Cases NSCC by Deji Sasegbon from 1985 are also in the Nigerian Weekly Law Report of Gani Fawehinmi, repetition due to multiplicity of reports.

(3) **Cost:**

The various law reports especially the privately produced ones are outrageously high and the prices keep rising. The Gani Fawehinmi's Nigerian Weekly Law Report publication is over ₦750.00 a copy, and it is the only current authority on the decisions of the Court of Appeal and the Supreme Court as at now.

Nigerian Supreme Court Cases by Deji Sasegbon is now at present 20 volume publication for a set, and as at now a set is over N10,000.00.

To have a successful career in Law especially in practice one needs to buy at least the Nigerian Weekly Law Report.

The reason mainly for this high cost of the reports is because of the high cost of publishing and production especially with our present economic situation which is very depressive. So getting the reports cheaply is not possible.

(4) **Lack of Proper Index**

Except for Gani's Weekly and Sasegbon's report most of the Law reports do not have index, those that have just have tables of cases and index of parties not subject index, so there is great difficulty in tracing cases.

The indexes to the reports that have index, need to be improved. For NSCC, the subject titles are not sufficiently subdivided into smaller divisions with separate headings.

(5) **Number of Cases Reported**

The number of cases reported are still small compared to the unreported ones; this is true of the High Courts and Court of Appeal decisions, but Sasegbon has taken care of the Supreme Court judgements up to 1990.

(6) Law reporting is taken as a creative past time, not full time job, so no deep commitment. It is the same law reporter who would also appear as counsel in court for cases, he then afterward comes back to law reporting. No effective law reporting could be done this way.

- (7) Many law publishers do not see the need for a full time law reporter who is a lawyer, this is very common in publishing houses like Evans Publishers Limited and University Press Limited. They just employ legal practitioner as editorial members, but the production of the law report is done by members of their staff who are editors and these are not lawyers in most cases. This may well be responsible for the unsteady future of law publishing in Nigeria.
- (8) Absence of counsel arguments in the law reports. It is better if arguments are exhibited fully enough to explain points made, the line of reasoning and the authorities relied on. According to Pollock, "Nothing but careful attention to the arguments as it actually takes place will produce an adequate report."⁸ The law reporters do not stay in the courts to listen to the case, all they do is to transcribe the judgment delivered.
- (9) Book buying habit of even the legal practitioners and law students has so far been unimpressive; and this has thwarted the growth of law publishing industry.
- (10) **Irregular Reporting**
According to Bankole "Apart from Gani's publications which have been regular, there has been a plethora of private law reports in Nigeria, and many have had a very checkered life, others very grossly in arrears, a few have managed to stay alive, albeit unsteadily the so called monthly fall into quarterly or even cease for some time."¹⁰
- Also some law reports have been dormant or latent for some years and then come up again when users have forgotten about their existence. This is great set back to our law reporting system in this country.
- (11) **Absence of headnotes**
The official reports all lack headnotes. And those with head notes especially Gani and Sasegbon's publications, the "Helds" are too excessive and mostly superfluous matter.

Law reporting commenced in Nigeria with the avowed objects of providing the profession with reports of superior court decisions,

⁸ Frederick Pollock: *English Law Reporting LOR*. Vol. xix (1903) P. 451-460 at 457.

⁹ Bankole, B. *ibid*

but from all the above listed criticisms, it show that much still remains to be done in the system of reporting and to the format of the law reports themselves.

Suggestion for Reform in Our Present Law Reporting System

A satisfactory system of law reporting must meet the following requirements which are grouped under three general broad headings, namely; (i) the subjects recorded (ii) mode of reporting and (iii) the time and form of the publication.

- (1) The subject reported should include all cases which introduce or appear to introduce a new principle of law or new rule, or which settle or tend to settle a question on which the law is doubted or which for any other reasons are particularly instructive.
- (2) As regards mode of reporting, the great point to bear in mind is that, what the legal profession wants is law and such facts only as are necessary to enable the reader of the report to appreciate the law found in the case; keeping this in mind, reports should be: accurate, full in the sense of conveying everything material and useful, and as concise as is consistent with the requirement. The points contended for by the counsel should be noticed and the grounds on which the judgement is based should receive special attention. The whole value of a report depends on this part of it, and on the distinctiveness with which it is brought out.¹⁰
- (3) As regards the time and form of publication, the legal profession wants report published as speedily as possible, good print, good paper, a convenient portable size, convenient arrangement of the main body of the case, good indexes and lowest price. The reforms stated above should proceed along the following lines in detail as follows:
 - (i) promptness in Reporting
the time lag between judgment and its appearance in print should be reduced to a minimum. Strict punctuality is what the aim of the law reporters should be.

For official reports, law reporters who should be qualified lawyers should be employed, these ones would be exclusively devoted for this duty. The duty of such is to collect the judgments of the courts and process them promptly.

Lord Lindley; The History of the Law Reports. LOR Vol. 1 No. 11 1895

(ii) Reporting of many more cases

The court reports should report all the decisions of the courts in its reports. In their own situation there should be no question of discretion; and for these, a comprehensive coverage is desirable, with headnotes and comprehensive of the cases.

For private law reports, as many cases that decide points of law should be reported. Also subject specialist law reporting should be done more, there are still few subject specialist law reports, more of these would be a boost on the law reporting system.

Further on the issue that more cases should be reported, the main reason for this is that it is so much inconvenient to find that one leading case is not reported because there is no way a legal practitioner can conveniently consult an important case which has been omitted.

Indexing

Each law report must have its own index because the value of any legal publication depends to a large extent on its index. The index must comprise first, a list of reported cases in alphabetical order, then the subject matter index. With a proper system of indexing it is possible for a legal researcher to skip those cases which he does not need. Coast.

The government should subsidize the cost of these law reports which are extremely very expensive or the low priced copies of these reports should also be produced.

Law Reporter

The law reporters should be more devoted to their work. They should have sense of dedication towards their work because the law reporter is engaged upon a work of great public importance viz the recording of decisions which are of use to the legal profession. It should be regarded as a full time work not regarded as a past time or hobby.

Computerization

The system of law reporting should be computerized (as we are in the computer age this would hasten production and frequency of the reports.

A very important aspect of reform lies in the creation of one central body for law reporting. One set of report alone is to be regarded as containing and authoritative exposition of law as declared and applied in the instances reported.

This suggestion is equally raised by Umoh, and he stated thus, "We suggest that a National Council of law reporting be set up by the Federal Government with exclusive responsibility for law reporting in the country. The council should have representative reporters in each judicial division or group of judicial division in the country, for the purpose of more efficient despatch of business.

The Chairman of the Council, the reporters and the editorial staff should be experienced lawyers and should be employed full time. The Council should be statutory body and should adopt rules of procedure which among other things would place reporters under an obligation to send in reports of case within a given time".

He went on further, that the purpose of the council would be to exercise exclusive jurisdiction and control over law reporting in the country, official and private reports should cases, so diversity of reports in the country will come to an end. Judges and practitioners will have one source to look to – Report of the council"¹¹

There is no doubt that with careful planning the council can organize a prompt and regular reporting of the decisions of the superior courts in Nigeria. This will be of immense help to the country as a whole, the members of the bar and the legal profession itself.

CONCLUSION

In ordinary life, men's tastes and inclination are formed and improved by their surroundings in a far greater degree than we think. Legal tastes and inclination are governed by the same rule.

In Nigeria, man's legal tastes and inclination must put up with the present system of law reporting. No series gives us exactly what we want, some approach our ideal more nearly than others, but none dare break loose from the system altogether. There is no gainsay with the fact that a higher standard in reporting can be obtained, and many practitioners who are at present insensitive to this fact would be aroused and would realize this when a standard law report is produced.

Until we have such publications of judicial decision which alone shall be received and acted as authoritative by all, reforms in our present system of law reporting must be regarded as transitional and incomplete, and we have not yet got what we want.

It may therefore be conceded without qualification that many aspects of law reporting in Nigeria are unsatisfactory, and so it is therefore submitted that the legal profession should look at the whole matter as a matter of urgency.

BIBLIOGRAPHY

BOOKS

- Blunt, Adrian; Outlines of modern law Librarianship, Butterworths.
- Burke, John (ed): Jowitt's Dictionary of English law, 2nd ed., Sweet and Maxwell, 1977.
- Cohen, Morris: How to Find the Law, 7th ed., West Publishers.
- Dane, Jean & Thompson, P., How to Use a Law Library, Sweet and Maxwell, 1979.
- Derek, Way; The Students' Guide to Law Libraries
- Fawehinmi, Gani: Digest of Supreme Court Cases 1956-1984 Vol. 1, Nigerian Law Publications, 1986
- Logan, R. G. (ed.) Informatio Sources in Law, Butterworths, 1986.
- Moys, Elizabeth: Manual of Law Librarianship, Sweet and Maxwell
- Umoh, P. U. Precedents in Nigerian Courts, Fourth Dimensions Publishers, 1986
- Williams, Glanville, Learning The Law, 10th ed., Sweet and Maxwell.

JOURNALS AND ARTICLES

- Bankole, S.B. Law Reporting in Nigeria. Being paper presented on 3rd course in law Library Services on 3rd May, 1991 at the Institute of Advanced Legal Studies, Lagos.
- Burrow, R Law Reporting.
- Law Quarterly Review, Vol. 58, 1942.
- Illis, C. J.: Law Reporting
- Law Librarian vol. 16, 1975.
- Osoko, K. JSC (rtd) Valedictory speech on his Retirement from the Supreme Court. Daily Sketch, Fir. Oct. 5, 1990.
- Podhart, A.L., Reporting The Law.
- Law Quarterly Review, Vol. 55 1939
- Onyeonke, B. (SAN) Interview with Lawfair Magazine, Vol. 1 No.1, Monday, May Monday, June 11, 1990. Newfair Communications Limited, Lagos.
- Podley, Lord: History of Law Reports
- Law Quarterly Review, Vol. 1 No. 11, 1885.
- Podley, John; The Present system of Law Reporting, Law Quarterly Review Vol. 1893.