

Exhibit A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

SIMBI KESIYI WABOTE,

Plaintiff,

v.

JACKSON UDE,

Defendant.

No. 5:21-cv-02214-JFL

**PLAINTIFF'S RESPONSES
AND OBJECTIONS TO
DEFENDANT'S FIRST
REQUEST FOR
INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Simbi Kesiye Wabote ("Plaintiff"), by and through his undersigned counsel, hereby responds and objects to Defendant Jackson Ude's ("Defendant") First Request for Interrogatories.

INTERROGATORY NO. 1:

State your full name and current residential address.

Response to No. 1:

Mr. Simbi Kesiye Wabote

Villa 11, Golden Tulip Estate, Government Reservation Area, Onopa Yenagoa, Bayelsa State, Nigeria.

INTERROGATORY NO. 2:

State your current places of employment and positions in the last 10 years.

Response to No. 2:

Shell Petroleum Development Company Ltd. (SPDC) September 1991 - August 2016.
Nigerian Content Development and Monitoring Board (NCDMB) Sept 2016 – Present.

INTERROGATORY NO. 3:

Fully and specifically state your positions and roles at Nigerian Content Development Monitoring Board (NCDMB).

Response to No. 3:

Executive Secretary.

To oversee the implementation of the Nigerian Oil and Gas Industry Content (NOGIC) Act 2010.

INTERROGATORY NO. 4:

Please clearly state and itemize all the injuries and damages that you allege to have suffered as a result of your alleged defamation in your complaint and claims; and state where you suffered the injuries and/or the effects of the alleged injuries.

Response to No. 4:

Plaintiff objects to this request as confusing in that Plaintiff does not allege he committed defamation, and in that "effects of the alleged injuries" is vague and ambiguous. Plaintiff further objects to this request to the extent that certain damages may be a matter of law based on what remedies are available to Plaintiff. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Reputational damage, mental anguish, suffering, and humiliation.

INTERROGATORY NO. 5:

State clearly your relationship with the ruling political party in Nigeria, the APC.

Response to No. 5:

Plaintiff objects to this request to the extent that "State clearly your relationship" is not defined and is vague and ambiguous. Plaintiff further objects to this request as irrelevant to the claims and defenses in this Action. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

No relationship.

INTERROGATORY NO. 6:

Identify all current (and former, since May 29, 2015 to the present) directors, officers, shareholders, subsidiaries and businesses of the NCDMB.

Response to No. 6:

Plaintiff objects to this request as irrelevant to the claims and defenses in this Action. Plaintiff further objects to this request as overbroad and unduly burdensome. Plaintiff further objects to this request as the information sought is not in Plaintiff's possession, custody, or control.

INTERROGATORY NO. 7:

Identify Any and All Third Parties that perform work for the Nigerian Content Development and Monitoring Board ("NCDMB").

Response to No. 7:

Plaintiff objects to this request as irrelevant to the claims and defenses in this Action. Plaintiff further objects to this request as overbroad and unduly burdensome. Plaintiff further objects to this request as the information sought is not in Plaintiff's possession, custody, or control.

INTERROGATORY NO. 8:

Identify Any and All Third Parties that work for or Contribute to the NCDMB.

Response to No. 8:

Plaintiff objects to this request as irrelevant to the claims and defenses in this Action. Plaintiff further objects to this request as overbroad and unduly burdensome. Plaintiff further objects to this request as the information sought is not in Plaintiff's possession, custody, or control.

INTERROGATORY NO. 9:

Identify Any and All Third Parties that perform contract works for the NCDMB and your relationship to them.

Response to No. 9:

Plaintiff objects to this request as irrelevant to the claims and defenses in this Action. Plaintiff further objects to this request as overbroad and unduly burdensome. Plaintiff further objects to this request as the information sought is not in Plaintiff's possession, custody, or control.

INTERROGATORY NO. 10:

Identify Any and All Third Parties and Banks where NCDMB maintain and/or keep its accounts.

Response to No. 10:

Plaintiff objects to this request as irrelevant to the claims and defenses in this Action. Plaintiff further objects to this request as overbroad and unduly burdensome. Plaintiff further objects to this request as the information sought is not in Plaintiff's possession, custody, or control.

INTERROGATORY NO. 11:

Identify and clearly state all and every bank, no matter where located, where you have maintained any bank account from 2010 to the present, whether still in operation or closed.

Response to No. 11:

Plaintiff objects to this request as overbroad and unduly burdensome especially in light of the timeframe given which is not reasonably related to the timeframe of the allegations in the Complaint nor in the alleged defamatory statements. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Bank of America

HSBC Dubai

First Bank, Nigeria

Guaranty Trust Bank Nigeria

Standard Chartered Bank Nigeria

SunTrust Bank Nigeria

INTERROGATORY NO. 12:

Identify Any and All your bank account numbers and the names and addresses of the banks involved, no matter where located from 2010 to the present.

Response to No. 12:

Plaintiff objects to this request as overbroad and unduly burdensome especially in light of the timeframe given which is not reasonably related to the timeframe of the allegations in the Complaint nor in the alleged defamatory statements. Subject to and without waiving the foregoing objections, Plaintiff is willing to provide banking records and information within a reasonable timeframe and subject to a stipulated protective order between the parties to maintain confidentiality of financial and banking records.

INTERROGATORY NO. 13:

Identify and clearly and specifically state the banking institutions, and the bank account numbers of the NCDMB, from January 2015 to the present.

Response to No. 13:

Plaintiff objects to this request as the information is not in Plaintiff's possession, custody, or control.

INTERROGATORY NO. 14:

Please clearly and fully state and identify Any and All Third Parties that provided You with medical care from January 1, 2015 until the present day.

Response to No. 14:

Plaintiff objects to this request as overbroad and unduly burdensome especially in light of the timeframe given which is not reasonably related to the timeframe of the allegations in the Complaint nor in the alleged defamatory statements.

INTERROGATORY NO. 15:

Fully and clearly state the effects on the forum where this federal district court is located and/or on the United States of America, of the alleged publications forming the bases of your complaint and claims in this case.

Response to No. 15:

Plaintiff objects to this request as confusing and incomprehensible as "clearly state the effects on the forum" does not have any precise meaning and the question is thus unanswerable.

INTERROGATORY NO. 16:

Describe Your Relationship with any Third Party that You identified in your answers to Interrogatories 3-15.

Response to No. 16:

Plaintiff objects to this request as there are no Third Parties identified in responses 3-15.

INTERROGATORY NO. 17:

Clearly and fully state the full and complete addresses of all the persons that you identified as witnesses in your Rule 26(A)(1) Initial Disclosures; your relationship to the witnesses; and their places of employment from January 2015 to the present.

Response to No. 17:

Plaintiff objects to this request to the extent that the information sought is not in Plaintiff's possession, custody, or control. Subject to and without waiving the foregoing objections, Plaintiff responds as follows:

Mr. Ojo and Mr. Igbikiowubo are freelance journalists operating and covering news in Nigeria.

Adewole Ojo

The Resource Space

12a Mabinuori Dawodu Street Gbagada Estate Phase 1, Lagos, Nigeria

Hector Igbikiowubo

Plot 2191 Osiefa Crescent, Lilly Estate, Amuwo-Odofin, Lagos, Nigeria

INTERROGATORY NO. 18:

Clearly, fully and fully state your reasons why this court should exercise extraterritorial jurisdiction over your claims in this case.

Response to No. 18:

Plaintiff objects to this request as unintelligible and confusing, as there is no question of extraterritorial jurisdiction being presented in this Action.

INTERROGATORY NO. 19:

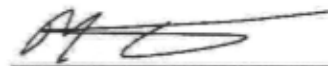
Fully and completely state (country and continent) where your causes of action in this case arose.

Response to No. 19:

Plaintiff objects to this request as vague and ambiguous as to the meaning of "where your causes of action in this case arose." This question can have several interpretations as to what is actually being asked, including whether it is asking where Plaintiff lives, where Defendant lives, where Defendant was located when he published the defamatory statements, etc.

Respectfully submitted,

LEWIS & LIN LLC



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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

SIMBI KESIYI WABOTE,

Plaintiff,

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JACKSON UDE,

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No. 5:21-cv-02214-JFL

**VERIFICATION OF
INTERROGATORY ANSWERS**

I, Simbi Kesiyi Wabote, am the Plaintiff in this action. I believe, based on reasonable inquiry, that the responses given to Defendant's First Request for Interrogatories are true and correct to the best of my knowledge, information, and belief.

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: October 1, 2021 in Nigeria.



Simbi Kesiyi Wabote 10/01/2021

Exhibit B

19th December, 2021

The Chairman,
Code of Conduct Bureau (CCB),
5th Floor, Federal Secretariat Complex, Annex III,
Shehu Shagari Way, Maitama, Abuja.

Dear Sir,

PETITION AGAINST THE EXECUTIVE SECRETARY,
NIGERIAN CONTENT DEVELOPMENT AND MONITORING
BOARD (NCDMB), ENGR. WABOTE SIMBI KESIYE FOR
SUSPECTED CASES OF MONEY LAUNDERING RUNNING INTO
BILLIONS OF NAIRA, RUNNING A PRIVATE COMPANY AS
A SERVING PUBLIC OFFICER AND INFLUENCING
CONTRACTS AWARD TO COMPANIES WITH VESTED
INTEREST

Transparency and Accountability is a Civil Society Organization based in Nigeria. We focus on raise awareness on issues related to transparency, money laundering, justice, peace building, corruption and rule of law. Since our inception, we have collaborated with the authorities both local and international, to expose corruption and injustice in all sectors of the Nigeria society, a feat we have achieved with outstanding results.

In an era where Prominent Nigerians be have consistently boasted of pocketing all anti-corruption agencies, we have not heard once either as fact or rumour that CCB under your various pragmatic leadership have being tainted by corrupt politicians or individual. This is due to the incorruptible nature of your offices. We have raised this fresh petition to your office as our last option knowing you that you fear or favour no one. We do believe that with this in your possession, the powers of state will be initiated to investigate all mentioned individuals/corporate

bodies, who have successfully escaped the hammer of probe of all the other agencies both local and international.

THE OFFENDER AND THE LAW

ENGR. WABOTE SIMBI KESIYE was appointed as the Executive Secretary **Nigerian Content Development and Monitoring Board (NCDMB)** by President Muhammadu Buhari (GCFR) on the 29th of September 2016. He was reappointed for a 2nd tenure by Mr. President on 25th September 2020, after a sterling performance in his first term of office. Prior to his appointment, **ENGR. WABOTE SIMBI KESIYE** was an Executive Director of Shell Petroleum Development Company (SPDC) Nigeria Limited and General Manager Business and Government Relations for Shell Companies in Nigeria (SCiN). Prior to joining politics, he worked as the Chief Executive Officer (CEO) of **TEE AND T CONCEPTS NIGERIA LIMITED**, which was incorporated in YENEGOA, Nigeria with **Registration Number 419331**. It was registered on 13th of July, 2001 with company's registered office address as **NO.7, INGBIROAD, AMARATA, YENEGOA, BAYELSA STATE**. This is a position which he continued to retain throughout his time in office as a public servant till date.

Section 172 of the 1999 Constitution (as amended) enjoins all persons in the public service to conform to the Code of Conduct. The Fifth Schedule (Part 1) (Section 5) of the Constitution says that;

"A public officer shall not put himself in a position where his personal interest conflicts with his duties and responsibilities."

Similarly, The Fifth Schedule (Part 1) (Section 6) of the Constitution provides that without prejudice to the generality of Section 5 of this Act, a public officer shall not

6 (b) *except where he is not employed on full time basis, engage or participate in the management or running of any private business, profession or trade; but nothing in this paragraph shall prevent a public officer from engaging in farming or participating in the management or running of any farm.*

Our investigations have revealed in details how ENGR. WABOTE SIMBI KESIYE has contravened the laws as stated above as well committed acts of money laundering and tax evasion in the process.

AFFILIATED COMPANY -

COMPANY - TEE AND T CONCEPTS NIGERIA LIMITED

ADDRESS - No.7, Ingbiroad, Amarata, Yenegoa, Bayelsa State.

DIRECTORS - Sotonye Wabote (Director), Simbi Kesiye Wabote (Director)

BANKER(S) - Zenith Bank (1013755048)

Fidelity Bank (4010268127)

ISSUE 1: ACTIVELY RUNNING A PRIVATE BUSINESS WHILE SERVING AS A PUBLIC OFFICER

Financial audit of the bank statements of the company, TEE AND T CONCEPTS NIGERIA LIMITED, indicates that the company has actively continued operations. This is made obvious by the various financial transactions carried out with other entities (both individuals and companies). Furthermore, our checks with the Corporate Affairs Commission (CAC) Abuja also revealed that he remained a Director of the company till date. For example, below is an excerpt from the company's

financial statement further indicating that the company never went dormant in its operations.

| Account Name | Account Number | Transaction Date | Year | Transaction Amount | Transaction Description | Transaction Type | Bank |
|------------------------------------|----------------|------------------|------|--------------------|--|------------------|--------|
| TEE AND T CONCEPTS NIGERIA LIMITED | 1013755048 | 13/02/2018 | 2018 | 10,000,000.00 | INFLOW FRM AMAL INTERNATIONAL AGENCIES L | CREDIT | ZENITH |
| TEE AND T CONCEPTS NIGERIA LIMITED | 1013755048 | 13/02/2018 | 2018 | 16,360,000.00 | INFLOW FRM AMAL INTERNATIONAL AGENCIES | CREDIT | ZENITH |
| TEE AND T CONCEPTS NIGERIA LIMITED | 1013755048 | 13/02/2018 | 2018 | 19,999,000.00 | INFLOW FRM JIMOH ASAJU MOHAMMED | CREDIT | ZENITH |
| TEE AND T CONCEPTS NIGERIA LIMITED | 1013755048 | 15/02/2018 | 2018 | 45,000,000.00 | NIP CR/MOHAMMED JIMOH ASAJU/ECO | DEBIT | ZENITH |
| TEE AND T CONCEPTS NIGERIA LIMITED | 1013755048 | 13/04/2018 | 2018 | 49,257,000.00 | TRF FROM TELECOMS & TECH CONCEPTS LTD | CREDIT | ZENITH |

We have annexed full financial exhibits to this petition to further assist with investigations and also buttress our claims.

RISK

Running a private company with interest in landing state contracts either directly or via proxy companies and acquiring compensation in form of business transaction with proxy companies and possibly funds roundtripping. The award of contracts/projects to the company may have been influenced by **ENGR. WABOTE SIMBI KESIYE** using his office as an Executive Secretary of the **NIGERIAN CONTENT DEVELOPMENT AND**

MONITORING BOARD (NCDMB) a government entity that works directly and closely with contracts/contractors, as well as performing regulatory functions for projects in the oil and gas industry.

RECOMMENDATION

Investigation by the CCB should be initiated into his involvements with the company **TEE AND T CONCEPTS NIGERIA LIMITED** as public servant and the EFCC should investigate the various companies sending and receiving funds from **TEE AND T CONCEPTS NIGERIA LIMITED** and the authenticity of the various transactions with **TEE AND T CONCEPTS NIGERIA LIMITED** as we believe these transactions may be part of a much complex scheme of money laundering.

ISSUE 2: SUSPECTED PAYMENTS / POSSIBLE MONEY LAUNDERING

The Money Laundering Prohibition Act of 2011 (as amended) provides for procedures for customer due diligence, reporting requirements, offences and penalties. Section 15 (2) clearly stipulates the offence of money laundering as thus;

2. Any person or body corporate, in or outside Nigeria, who directly or indirectly--commits an offence of money laundering under this Act.

a. conceals or disguises the origin of

b. converts or transfers

c. removes from the jurisdiction or

d. acquires, uses, retains or takes possession or control of any fund or property, knowingly or reasonably ought to have known that such fund or

property is, or forms part of the proceeds of an unlawful act

3. A person who contravenes the provisions of subsection (2) of this section is liable on conviction to a term of not less than 7 years but not more than 14 years imprisonment.

4. A body corporate who contravenes the provisions of subsection (2) of this section is liable on conviction to-

a. a fine of not less than 100% of the funds and properties acquired as a result of the offence committed and

b. withdrawal of licence

5. Where the body corporate persists in the commission of the offence for which it was convicted in the first instance, the Regulators may withdraw or revoke the certificate or licence of the body corporate

6. The unlawful act referred to in subsection (2) of this section includes participation in an organized criminal group, racketeering, terrorism, terrorist financing, trafficking in persons, smuggling of migrants, sexual exploitation, sexual exploitation of children, illicit trafficking in narcotic drugs and psychotropic substances, illicit arms trafficking, illicit trafficking in stolen goods, corruption, bribery, fraud, currency counterfeiting, counterfeiting and piracy of products, environmental crimes, murder, grievous bodily injury, kidnapping, hostage taking, robbery or theft, smuggling (including in relation to customs and excise duties and taxes), tax crimes (related to direct taxes and indirect taxes), extortion, forgery, piracy,

| | | | | | | | |
|---------------------------|-----------------|----------------|------|------------------------|--|-------|----------------------|
| WABOTE SIMBI KESIYE | 313063 3287 | 02/07/20 19 | 2019 | 14,280,000 .00 | FUNDS TRSF:GOLD STAR AND AL-M | DEBIT | FIRST BANK |
| WABOTE SIMBI KESIYE | 311516 7725 | 31/01/20 19 | 2019 | 6,750,000. 00 | DANGOTE | DEBIT | FIRST BANK |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | 16,000,000 .00 | OL0040190122002 80. M. ATOYEBI & PAR | 627 | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 08/01/20 19 | 2019 | 5,000,000. 00 | NG-013-190108- 170721641- 829596-155 | 627 | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | 8,000,000. 00 | OL0040190122003 1AWUBARA INVESTMENT | 627 | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | 16,000,000 .00 | OL0040190122002 80. M. ATOYEBI & PAR | 627 | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 29/01/20 19 | 2019 | 5,000,000. 00 | NG-013-190129- 081523123- 169180-863 | 627 | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 08/01/20 19 | 2019 | - 5,000,000. 00 | NG-013-190108- 170721641- 829596-155 | Debit | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | - 8,000,000. 00 | OL0040190122003 1AWUBARA INVESTMENT | Debit | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | - 16,000,000 .00 | OL0040190122002 80. M. ATOYEBI & PAR | Debit | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 29/01/20 19 | 2019 | - 5,000,000. 00 | NG-013-190129- 081523123- 169180-863 | Debit | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | 16,000,000 .00 | OL0040190122002 80. M. ATOYEBI & PAR | DEBIT | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 08/01/20 19 | 2019 | 5,000,000. 00 | NG-013-190108- 170721641- 829596-155 | DEBIT | STANDARD CHATERED |

| | | | | | | | |
|---------------------------|-----------------|----------------|------|-------------------|--|-------|----------------------|
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | 8,000,000. 00 | OL0040190122003 1AWUBARA INVESTMENT | DEBIT | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 22/01/20 19 | 2019 | 16,000,000 .00 | OL0040190122002 80. M. ATOYEBI & PAR | DEBIT | STANDARD CHATERED |
| SIMBI KESIYE WABOTE | 100008 19981 | 29/01/20 19 | 2019 | 5,000,000. 00 | NG-013-190129- 081523123- 169180-863 | DEBIT | STANDARD CHATERED |

RISK

Transfer of large sums in tranches with no transaction description/purpose or perplexing descriptions mostly on same days. Possible funds layering.

RECOMMENDATION

The CCB and EFCC should investigate and ascertain the purpose of the funds transferred and who exactly initiated the transfer. The FIRS should investigate possible tax evasion. Various alarming deposits in his bank accounts need to also be investigated as they are quite enormous. We believe that ENGR. WABOTE SIMBI KESIYE allegedly operates foreign bank account as a part of this complex scheme of money laundering.

CONCLUSION

We urge you to order a detailed investigation as regards these valid claims as few individuals have abused their offices and used their positions to loot our collective wealth and deprived so many Nigerians the opportunity of experiencing the positive effect of government. We believe that this investigation by your good offices will uncover even more infringements that spans beyond the person/body listed in this petition if thoroughly done.

Yours sincerely,

Comrade Timothy Uga
(*Chairman*)

Exhibit C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

SIMBI KESIYI WABOTE,

Plaintiff,

v.

JACKSON UDE,

Defendant.

No. 5:21-cv-02214-JFL

**PLAINTIFF'S RESPONSES
AND OBJECTIONS TO
DEFENDANT'S SECOND
REQUEST FOR
INTERROGATORIES**

Pursuant to Federal Rules of Civil Procedure 26 and 33, Plaintiff Simbi Kesiye Wabote ("Plaintiff"), by and through his undersigned counsel, hereby responds to Defendant Jackson Ude's ("Defendant") Second Request for Interrogatories.

INTERROGATORY NO. 1:

Please clearly, fully and specifically state your monthly income (from whatever source) and expenses, and stating clearly and specifically the sources of your stated income, from 2019 to the present.

Response to No. 1:

My monthly income is as reflected in my monthly pay slip that I have submitted earlier. I have also submitted my annual allowance that is paid to me once every year that make up my annual emolument which also includes my salary.

INTERROGATORY NO. 2:

State clearly, fully and specifically the sources of the information in paragraph 20 of the plaintiffs complaint, and fully and completely state the full identities of the individuals who have hired defendant to publish defamatory articles on business or political rivals, as alleged in paragraph 20 of the plaintiffs complaint.

Response to No. 2:

That Ude gets paid to publish fake news articles and that Ude publishes fake news articles and then attempts to get paid to take them down is well known in Nigeria, and so are the many litigations and judgments against Point Blank News and Jackson Ude. Even myself, I

received text messages requesting a payment be made for the article in question to be taken down, and one of the individuals mentioned is very active in the political landscape from the opposition party (PDP). See Pl. 00168-00201 attached hereto.

INTERROGATORY NO. 3:

Fully, completely and specifically state the sources of the information in support of your allegations in paragraphs 21 and 22 of your complaint.

Response to No. 3:

This information came from Point Blank News's website located at <www.pointblanknews.com>.

INTERROGATORY NO. 4:

Please clearly, fully and specifically state what was done and how it was done to inform Defendant of the untruthfulness of the alleged defamatory statements as contained in paragraph 3 of the plaintiffs complaint.

Response to No. 4:

At the very least, Defendant was made aware of, if not specifically served with, the Cease and Desist letter, which can be found at Pl. 00094, and which was delivered to Defendant by, inter alia, e-mail to jackson@pointblanknews.com.

This was also followed up by a lot of twitter response by Jackson Ude owning up to the publication and requesting any aggrieved person that has been hurt by the publication should seek redress and such redress should be in the United States where he resides.

INTERROGATORY NO. 5:

Fully and completely state the sources of the plaintiffs information in support of the plaintiffs allegations in paragraph 19 of the plaintiffs complaint, and stating fully and completely the names and addresses of the several Nigerian courts that issued the alleged orders; the docket numbers of those cases allegedly involving Pointblank News and the alleged orders; and how, when (dates), where and upon whom were the Summons and the Complaints in those cases in the several Nigerian courts were served.

Response to No. 5:

That Ude gets paid to publish fake news articles and that Ude publishes fake news articles and then attempts to get paid to take them down is well known in Nigeria and is covered by online and print news media at various times, and so are the many litigations and judgments against Point Blank News and Jackson Ude. I am aware of at least two suits, with monetary judgments and restraining orders issued against Ude:

1. *Nasiru Danu* (Claimant) VS. *Pointblank News Communications Inc.; Jackson Ude* (Defendants) Suit No: FCT\HC\CV\1789\202;
2. *Dr. Mrs. Ngozi Okonjo-Iweala, CFR* (Plaintiff) VS. *Pointblank News Communications Inc.; Jackson Ude; Churchill Umoren* (Defendants) Suit No. FCT\HC\CV\2602\12

See Pl. 00175-00201 attached hereto.

Respectfully submitted,

LEWIS & LIN LLC

/s/ Michael D. Cilento

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VERIFICATION OF SECOND
INTERROGATORY ANSWERS

I, Simbi Kesiya Wabote, am the Plaintiff in this action. I believe, based on reasonable inquiry, that the responses given to Defendant's Second Request for Interrogatories are true and correct to the best of my knowledge, information, and belief.

I declare under the penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: January 10, 2022 in Nigeria.



Simbi Kesiya Wabote