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9/03/26
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IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
ACCRA A D 2026

at
~~.....~~
HIGH COURT
ACCRA

SUIT NO. GJ/0487/2026

PROFESSOR EMMANUEL OHENE AFOAKWA
VICE-CHANCELLOR
H/NO. DF 736 Yaw Street
Pantang North, Accra

PLAINTIFF

VRS

- 1 GHANA COMMUNICATION TECHNOLOGY UNIVERSITY
PRIVATE MAIL BAG 100
TESANO, ACCRA
- 2 ING. DIVINE KPETIGO
CHARMAN GCTU GOVERNING COUNCL
- 3 PROFESSOR EBENEZER MALCALM
ACTING PRO-VICE-CHANCELLOR
- 4 GHANA TERTIARY EDUCATION COMMISSION
(Plaintiff shall direct service)

DEFENDANTS

MOTION ON NOTICE
FOR AN INTERLOCUTORY ORDER UNDER ORDER 25 CI47

PLEASE TAKE NOTICE that this Honourable Court will be moved by Counsel for and on behalf of Plaintiff/Applicant herein respectively, praying for an order restraining Defendants either acting by themselves or through their assigns, privies, servants, agents, and any other party through whom they may claim from interfering unlawfully with the Plaintiff's employment, impeding the just disposal of the Plaintiff's obligations and enjoying all benefits accorded under the contract of employment between the Plaintiff and the 1st Defendant which does not expire until the 28th of February 2029 in whatsoever capacity until the final determination of the Plaintiff's substantive claim by this Honourable

Court upon grounds set out in the accompanying affidavit AND for such further
other order(s) as this Honourable Court shall deem fit.

Wk March
COURT TO BE MOVED ON *TUES* the *24th* Day
of *MARCH* 2026 at 9 O'clock in the forenoon or so soon thereafter
as the application shall be heard

Dated at 212 Worthy Avenue, North Legon Accra this 2nd Day of March 2026


EDWIN OSEI BOATENG
BARFO BONNEY & ASSOCIATES PRIVATE UNLIMITED COMPANY
212 WORTHY AVENUE
NORTH LEGON
ACCRA
TEL: 0542866755
SOLICITORS LICENCE AND DATE: eGAR03734/26

The Registrar
High Court
Accra

AND FOR SERVICE ON THE WITHIN NAMED DEFENDANTS

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE

ACCRA A D 2026

Filed on... 9/03/26
2:15 am/pm
at...
Registrar

SUIT NO: GJ/487/2026
HIGH COURT
ACCRA

PROFESSOR EMMANUEL OHENE AFOAKWA
VICE-CHANCELLOR
H/NO. DF 736 Yaw Street
Pantang North, Accra

PLAINTIFF

VRS

- 1 GHANA COMMUNICATION TECHNOLOGY UNIVERSITY
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(Plaintiff shall direct service)

DEFENDANTS

AFFIDAVIT IN SUPPORT OF THE APPLICATION

I, PROFESSOR EMMANUEL OHENE AFOAKWA, VICE-CHANCELLOR, H/NO. DF 736 Yaw Street, Pantang North, Accra make oath and say as follows.

- 1 That I am the Deponent hereto
- 2 That the contents of this affidavit unless otherwise stated are matters within my personal knowledge, information and belief

- 3 That at the hearing of this application I shall seek leave of this Honourable Court to refer to all the processes filed in this suit as if the same were reproduced in this affidavit in extensor and sworn to on oath.
- 4 That by agreement dated the 1st of March 2021, the 1st Defendant employed the Plaintiff as Vice-Chancellor of the 1st Defendant from the 1st of March 2021 until 28th of February 2025. **Attached herein is a certified copy of confirmation of the contract of employment between the Plaintiff and the 1st Defendant Exhibited Marked A**
- 5 That it was at all material times a term of the agreement that the 1st Defendant could extend the Plaintiff's employment with the 1st Defendant for a further term.
- 6 That per a letter dated the 20th of August 2024; the 1st Defendant extended the Plaintiff's employment as Vice-Chancellor with the 1st Defendant from the 1st of March 2025 until the 28th of February 2029. **Attached herein is a certified copy of confirmation of 1st Defendant extending the contract of employment between the Plaintiff and the 1st Defendant Exhibited Marked B**
- 7 That the Plaintiff accepted the 1st Defendant's offer upon the terms proposed by the 31st of August 2024 as instructed.
- 8 That the Plaintiff has never been notified by the 1st Defendant of any alleged offence and or breach of a term of the contract between the Plaintiff and the 1st Defendant.
- 9 That the Plaintiff has never been invited by the 1st and or the 2nd Defendants to a hearing and has never been heard in his defence regarding any offence alleged or breach of a term of the contract between the 1st Defendant and the Plaintiff.
- 10 That by a letter dated the 3rd and subsequently the 26th of February 2026 from the 1st and 2nd Defendants, Plaintiff was suddenly and surprisingly informed to cease holding his position as Vice Chancellor and that the 1st and 2nd Defendants were allegedly terminating the Plaintiff's contract of employment on the 28th of February 2026. **Attached herein is a certified copy of the letter Exhibited Marked C series**

- 11 That per another letter dated the 26th of February 2026; Plaintiff discovered that the 1st Defendant has instructed that the 3rd Defendant assume the Plaintiff's position as the alleged Vice Chancellor of the 1st Respondent from the 28th of February 2026. **Attached herein is a certified copy of the letter Exhibited Marked D**
- 12 That the arbitrary exercise of discretionary power by the 1st and 2nd Defendants seeking to purportedly terminate the Plaintiff's contract of employment without hearing the Plaintiff in relation to any allegation and or proving the Plaintiff's breach of a term of the contract between the Plaintiff and the 1st Defendant, is simply unlawful.
- 13 That all efforts aimed at preventing Defendants from detracting from Plaintiff's dignity, treating Plaintiff unfairly, respecting Plaintiff's fundamental human rights to fair hearing, treated with respect and common decency, in accordance with due process of law, has failed.
- 14 That section 9 (24) of Ghana Communication Technology University Act 2020 (ACT 1022), the law governing the conduct of Defendants, sets out a process of fair hearing, audi alteram partem, in addition to section 19 (13) of the 1992 Constitution of Ghana, which Defendants shall and must comply with in the event the 1st Defendant desired to relieve the Plaintiff of his post.
- 15 That the 1st and 2nd Defendants by their letters dated the 3rd of February and the 26th of February 2026, informing the Plaintiff suddenly that the Plaintiff's employment was arbitrary terminated by the Defendants without adherence to the laid down procedure of fair hearing espoused above, is breach of contract, natural justice, audi alteram partem and the Plaintiff's fundamental human right to a fair hearing.
- 16 That the 1st and or 2nd Respondent's breach of the Plaintiff's fundamental human right to a fair hearing before punishment renders alleged Plaintiff's employment termination decision communicated by the letters dated the 3rd of February and the 26th of February 2026 by the 1st and or 2nd Respondent's a nullity, amenable to be quashed by an order of certiorari from the High Court.
- 17 That the 4th Defendant by a letter dated the 3rd of March 2026, confirms Defendant's acquiescence of the 1st and 2nd Defendants breach of the

Plaintiff's fundamental human right to a fair hearing. **Attached herein is a certified copy of the letter Exhibited Marked E**

- 18 That Defendants failure to adhere to due process of law, breaching the Plaintiff's fundamental human right to a fair hearing, renders 1st and 2nd Defendants purported termination of Plaintiff's employment as Vice Chancellor, a nullity and of no legal effect.
- 19 That unless this Honourable Court intervene, and urgently, the Defendants will continue visiting irreparable loss, create chaos throwing the entire university into pandemonium, confusion serving Defendants personal interests, breaching Plaintiff's fundamental human right to fair hearing with impunity, subjecting the Plaintiff to ridicule, public shame, interfering with Plaintiff's dignity, throwing the entire University of the Republic of Ghana and the students into confusion, chaos, detracting from the welfare of the entire school and cohesion.
- 20 That unless restrained and urgently, Plaintiff, the students and the entire Ghanaian community is subjected to irreparable loss visited on them by the Defendants who continue to demonstrate utter contempt for the law and the fundamental freedoms of the Ghanaian people including the Plaintiff.
- 21 In the circumstance this is proper case where this Honourable Court ought to grant the present application

WHEREFORE I swear to this affidavit in support

SWORN at ACCRA this 9th)
Day of March 2026)



DEPONENT

BEFORE ME

