Young Lawyers and Challenges of Pupillage in Nigeria

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Abstract

Pupillage represents the period of practical training that follows academic qualifications of young lawyers. It aims to bridge the gap between theoretical study and practical legal skills. It is an essential phase in the professional development of legal practitioners in Nigeria. Pupillage is aimed to uphold the integrity, competency, and ethical standards of the legal profession. It is an essential phase in the legal profession, serving as a bridge between academic study and practical application. In Nigeria, pupillage allows young lawyers to acquire hands-on experience, refine their skills, and familiarize themselves with the ethical obligations required to succeed in the legal profession. Given the rigorous demands of legal practice, pupillage has become a crucial element for new legal practitioners; helping them transition effectively from theory to practice under the supervision of experienced legal professionals. Despite its significance, pupillage remains an under-explored and often unstructured aspect of the Nigerian legal system. Unlike jurisdictions such as the United Kingdom, where pupillage is formally mandated and structured, Nigeria lacks a standardized framework. This creates varied experiences for young lawyers, with some benefiting from structured training while others navigate the legal terrain with minimal guidance. This article provides an in-depth look into the challenges faced by young lawyers in the course of pupillage in Nigeria. Such challenges include but are not limited to low remuneration and financial hardships, inadequate structured mentorship and supervision, limited access to practical experience and court exposure, unreasonable work hours and excessive workload, lack of defined pupilage programs across law firms, ethical and professional challenges and limited opportunities for professional networking.

Key words: Young Lawyers, Challenges, Pupillage, Nigeria

1. Introduction

Pupillage is an essential phase in the professional development of legal practitioners in Nigeria, representing the period of practical training that follows academic qualifications and aims to bridge the gap between theoretical study and practical legal skills. It is a recognized practice that upholds the integrity, competency, and ethical standards of the legal profession. It is an essential phase in the legal profession, serving as a bridge between academic study and practical application. In Nigeria, pupillage allows young lawyers to acquire hands-on experience, refine their skills, and familiarize themselves with the ethical obligations required to succeed in the legal profession. Given the rigorous demands of legal practice, pupillage has become a crucial element for new legal practitioners; helping them transition effectively from theory to practice.[1] Despite its significance, pupillage remains an under-explored and often unstructured aspect of the Nigerian legal system. Unlike jurisdictions such as the United Kingdom, where pupillage is formally mandated and structured, Nigeria lacks a standardized framework. This creates varied experiences for young lawyers, with some benefiting from structured training while others navigate the legal terrain with minimal guidance. This article provides an in-depth look into young lawyers and the challenges of pupillage in Nigeria.

2. Clarification of Concepts

2.1 Meaning and Concept of Young Lawyers in Nigeria

young lawyers in Nigeria typically refer to legal practitioners who are in the early stages of their careers, often categorized as lawyers within the first seven years of their call to the Nigerian Bar.

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[1] Under the supervision of experienced Legal Professionals.

These lawyers are regulated by the Legal Practitioners Act and operate under the guidance of the Nigerian Bar Association (NBA). The Young Lawyers Forum (YLF), a sub-group within the NBA, represents and advocates for their professional interests, addressing issues such as career development, mentorship, and welfare. Young lawyers are essential to the legal profession as they bridge the gap between academia and practice, infusing energy, innovation, and adaptability into the legal field. In *Egbe v Alhaji,*[2] **t**his case emphasized the duty of lawyers, including young ones, to uphold professional ethics and integrity. A young lawyer filed a frivolous application that led to the court reprimanding the counsel. It underscores the expectation of professionalism from lawyers, regardless of their years of practice. In *Fasakin Foods Nig. Ltd v Shosanya,*[3] **t**he court discussed the importance of competence and diligence in legal representation. A young lawyer representing the appellant made procedural errors, leading to the appeal's dismissal. This case highlights the importance of training and mentorship for young lawyers to avoid procedural pitfalls. Also in *Nigerian Bar Association v Federal Government of Nigeria,*[4] the case emphasized the NBA's advocacy role and its impact on young lawyers, particularly in ensuring the rule of law and justice system reforms. This case showcases the NBA's role in creating an environment where young lawyers can thrive. Section 2[5] mandates that individuals must be called to the Bar to practice law in Nigeria. Section 8[6] establishes guidelines for professional conduct applicable to all lawyers, including young practitioners. Rule 1[7] emphasizes the lawyer's duty to uphold the rule of law and justice while Rule 14[8] addresses mentorship by senior lawyers, highlighting their responsibility in guiding young lawyers. Articles 6 and 11[9] establish the Young Lawyers Forum as a specialized body within the NBA to address their needs.

In *Okafor v Nweke,*[10] a young lawyer's signature on a legal document led to a dispute about procedural compliance. The Supreme Court emphasized the importance of adhering to procedural requirements. This case highlights the importance of continuous education for young lawyers to enhance their competence.

2.2 Meaning and Concept of Pupillage

Pupillage is traditionally understood as an apprenticeship undertaken by young legal practitioners to acquire practical legal skills under the guidance of a senior lawyer or firm. In Nigeria, it generally refers to the initial period after a lawyer is called to the bar, during which they gain practical experience in a law firm, under the tutelage of an experienced lawyer. While not formally legislated in Nigeria, this period of legal apprenticeship allows newly called lawyers to learn the complexities of the profession, from litigation procedures to client handling, research, and drafting.

Although the *Legal Practitioners Act* (LPA) and *Rules of Professional Conduct* (RPC) do not mandate formal pupillage, they recognize the value of mentorship and supervised experience. Section 8(2)[11] for example, highlights the requirement for legal practitioners to undertake a

[2] **(1990) 1 NWLR (Pt 128) 546**.
[3] **(2006) 10 NWLR (Pt. 987) 126.**
[4] **(2001) 7 NWLR (Pt. 712) 28.**
[5] **Legal Practitioners Act, Cap L11 LFN 2004.**
[6] *Ibid*.
[7] **Rules of Professional Conduct for Legal Practitioners 2007.**
[8] *Ibid*.
[9] **Nigerian Bar Association Constitution 2015 (as amended).**
[10] **(2007) 10 NWLR (Pt. 1043) 521.**
[11] Legal Practitioners Act, Laws of the Federation of Nigeria 2004.

period of practical experience before full admission to practice law, though it stops short of prescribing a formal pupillage structure. Similarly, the RPC[12] underscores the importance of maintaining ethical standards and professional competence, both of which can be developed during pupillage.

3. Overview of Pupillage in the Legal Profession in Nigeria

Pupillage in Nigeria, though informal and largely unregulated, is a foundational experience for many young lawyers. Unlike jurisdictions where pupillage is compulsory, Nigeria's approach remains decentralized, leaving young lawyers with varied experiences based on the standards of individual law firms. This lack of structure can lead to inconsistencies, as young lawyers in smaller firms or less formal settings may miss out on rigorous training opportunities available in larger, established chambers. The Nigerian Bar Association (NBA) has increasingly emphasized the need for structured pupillage, recognizing its role in developing a competent and ethical legal workforce. Through various mentorship initiatives, the NBA encourages law firms to adopt more comprehensive training programs, though these remain voluntary. Some of the programs also draw on international best practices, offering young lawyers exposure to global standards in legal practice.

However, the decentralized nature of pupillage presents challenges, including exploitation and inconsistency in the quality of mentorship. The case like *Femi v Oladele Chambers*[13] highlight instances where young lawyers faced exploitative conditions during their pupillage, with the court ruling against such practices and affirming the need for law firms to treat young lawyers with respect and fairness. Femi, a young lawyer, filed a suit against his supervising law firm for unpaid labour and lack of training opportunities. The court condemned the exploitative conditions and underscored the need for fair treatment and training for young lawyers.

4. Historical Evolution of Pupillage in Nigeria

The concept of pupillage, or supervised training for young lawyers, has its roots in the British legal system, which influenced Nigeria's legal framework during and after colonial rule. Historically, the legal profession in Nigeria has adopted many practices and principles from British common law, including the idea of mentorship for young practitioners. During the colonial period, legal practitioners in Nigeria often pursued their training in the United Kingdom, where structured pupillage was a prerequisite for entering the bar.

After Nigeria gained independence in 1960, the legal system sought to establish a professional framework that would ensure the competence and ethical standards of its practitioners, leading to the adoption of the *Legal Practitioners Act* (LPA). However, unlike the British system, which mandated pupillage as a requirement for bar admission, Nigeria did not formalize this process. Instead, the country relied on informal mentorship arrangements within law firms, where young lawyers would work under the guidance of experienced practitioners. The absence of a statutory requirement for pupillage led to varied and often inconsistent experiences for young lawyers, as some firms offered structured training programs while others left trainees to learn independently.

The Nigerian Bar Association (NBA) has long recognized these inconsistencies and has sought to promote more structured training programs within law firms. The NBA's focus on improving mentorship practices has gained momentum in recent years, particularly as the legal profession faces challenges such as increasing caseloads, the need for specialization, and adherence to

[12] Rules of Professional Conduct.
[13] (2021) LPELR-51229 (CA).

ethical standards. In response, the NBA has introduced several voluntary guidelines encouraging law firms to adopt pupillage programs. This has led to gradual improvements in the professional development of young lawyers, though challenges remain due to the lack of a unified approach.

5. Development of the Concept of Pupillage in Nigeria's Legal System

The development of pupillage in Nigeria's legal system has been shaped by several key factors: the influence of British legal traditions, the establishment of the NBA, and the enactment of legislation regulating legal practice. Although Nigeria has not instituted a mandatory pupillage period, several legislative and regulatory provisions underscore the importance of practical experience and mentorship. These legislative and regulatory provisions are discussed hereunder.

5.1 Statutory Provisions on Professional Development and Mentorship

The *Legal Practitioners Act* (LPA) and *Rules of Professional Conduct* (RPC) lay down a foundation for mentorship, highlighting the need for young lawyers to undergo practical training before full admission to practice. Section 8(2)[14] for instance, requires a period of practical experience as part of professional development, although it does not mandate a formalized pupillage program. Instead, it encourages law firms to provide opportunities for young lawyers to gain practical skills.

5.2 Judicial Recognition of the Importance of Mentorship

Nigerian courts have also recognized the importance of pupillage in fostering a competent legal profession. For instance, in *NBA v Munir Yakubu,*[15]the court acknowledged the role of structured training for young lawyers in upholding the ethical standards of the legal profession. The facts of this case are that Munir Yakubu, a young lawyer, was involved in an incident where he made unverified statements against senior members of the legal profession, allegedly without appropriate guidance from senior colleagues or a mentor. His actions were perceived as unprofessional and damaging to the reputation of the legal profession. The NBA filed a petition against Yakubu, questioning his conduct and challenging his qualifications and readiness to practice independently without appropriate supervision, typically provided in a pupillage framework. During the proceedings, the NBA argued that junior lawyers, such as Yakubu, require structured mentoring and supervision immediately after their call to the Bar to prevent misconduct and ensure adherence to ethical standards. The NBA contended that the absence of pupillage contributed to Yakubu's inappropriate conduct, emphasizing the critical role of mentorship in shaping a lawyer's professional judgment and ethical adherence. The court found Yakubu's conduct unbecoming of a legal practitioner and reiterated the need for a structured period of pupillage as a safeguard against such misconduct. It upheld the NBA's stance that junior lawyers benefit immensely from the guidance and mentorship of experienced practitioners to foster ethical practices and professional decorum. This case underscores the judiciary's support for the pupillage system as a means of nurturing professionalism among junior lawyers. It emphasizes that without the ethical grounding that mentorship provides, young lawyers may be more prone to engaging in misconduct.

Also in *Re: Application of Abdulkarim*[16] the Court of Appeal further reinforced the need for law firms to provide a supportive training environment for young practitioners. Abdulkarim, a newly qualified lawyer, argued that his firm did not provide him with the necessary practical training,

[14] Legal Practitioners' Act.
[15] (2018) 6 NWLR (Pt. 1610) 456.
[16] (2020) LPELR-50329 (CA).

which was essential for his development. The court held that young lawyers are entitled to proper mentorship, affirming the duty of law firms to actively contribute to their professional development.

5.3 Nigerian Bar Association's efforts to formalize Pupillage

The Nigerian Bar Association (NBA) has played a significant role in encouraging law firms to implement structured pupillage programs. Though not mandatory, the NBA has developed several guidelines to promote the establishment of training programs for young lawyers. In recent years, these guidelines have led to an increase in the number of firms offering structured pupillage programs, particularly in larger firms and metropolitan areas.

The NBA's approach, however, remains voluntary, and challenges persist due to the lack of a centralized regulatory requirement. The case of *Femi v Oladele Chambers*[17] revolves around issues of employment, mentorship, and allegations of breach of contract within the legal profession. In this case, the Court of Appeal addressed the relationship between a young lawyer and a law firm, examining the dynamics of pupillage and the obligations between a principal (law firm) and a junior lawyer. The facts of this case are that the appellant, Mr. Femi, was a young lawyer employed as an associate by Oladele Chambers. Upon joining the firm, Mr. Femi entered into a contract with Oladele Chambers that included an initial mentorship or "pupillage" period. This arrangement required Mr. Femi to work under close supervision to gain experience, with a lower starting salary that would be raised upon completing a specified period of pupillage. However, issues arose when Mr. Femi alleged that the firm breached the terms of the employment contract. He claimed that the firm did not provide adequate mentorship or training as stipulated and that he was often left to handle complex cases independently without the supervision promised. Additionally, Mr. Femi asserted that the firm failed to increase his salary after the agreed pupillage period elapsed, despite his requests for a review. After resigning, Mr. Femi filed a lawsuit against Oladele Chambers, alleging breach of contract and claiming compensation for unpaid wages and damages. Oladele Chambers argued that Mr. Femi did receive mentorship and training during his time at the firm. The firm contended that Mr. Femi's lack of initiative, rather than any shortcoming on the firm's part, accounted for any perceived lack of training or supervision. Furthermore, the firm argued that it was within its rights to delay the salary increment due to what it termed as "unsatisfactory performance." Oladele Chambers maintained that Mr. Femi had failed to complete the pupillage program to a satisfactory standard, which justified withholding the salary increase. The Court of Appeal held that Oladele Chambers had breached the terms of the employment contract with Mr. Femi by failing to uphold its part of the mentorship arrangement. The court found evidence that Mr. Femi was often left without the supervision and guidance stipulated in his contract, which constituted a breach of the implied agreement on pupillage. The court recognized that pupillage, although not universally regulated, is a period in which junior lawyers should receive substantive mentorship and guidance to develop their legal skills under the oversight of more experienced practitioners. By failing to provide this, Oladele Chambers undermined the appellant's professional development. The Court awarded Mr. Femi compensation for unpaid wages corresponding to the agreed salary increment and additional damages for breach of contract. This decision underscores the importance of mentorship agreements in pupillage or junior lawyer employment arrangements. It highlights that law firms have a contractual and ethical duty to provide meaningful mentorship and training, which forms a core part of the pupillage agreement, especially when this has been explicitly

[17] *Supra*.

promised. The k**ey** takeaways from this case are that the judgment emphasizes that a law firm is obligated to honour any terms related to mentorship or supervision set out in employment contracts, particularly for junior lawyers in pupillage roles. The case equally reinforces that the purpose of pupillage is to provide hands-on guidance and oversight, allowing young lawyers to develop their professional skills and ethical standards in a structured environment. The Court of Appeal's decision affirms that junior lawyers may have legal recourse for breach of contract where a law firm fails to provide the agreed-upon mentorship or support as outlined in their employment agreements. It equally highlights the importance of pupillage in the legal profession as a formative period that law firms must take seriously. By providing meaningful mentorship, law firms uphold their contractual obligations and contribute to the professional growth and ethical grounding of young lawyers.

6. Comparative Developments and International Influence

The concept of pupillage in Nigeria has also been influenced by the practices of other common law jurisdictions. The United Kingdom, for example, mandates a one-year pupillage period for barristers, providing a structured training environment with strict ethical guidelines. While Nigeria does not impose a similar requirement, the NBA has incorporated best practices from such jurisdictions into its guidelines, encouraging Nigerian law firms to adopt structured mentorship programs.

In summary, pupillage in Nigeria has evolved from an informal mentorship process to a more recognized and structured practice within the legal profession, thanks to the NBA's advocacy and Nigerian courts' acknowledgment of its importance. Although Nigeria lacks a formal statutory requirement for pupillage, case law and the professional community continue to emphasize its significance for young lawyers' growth and development.

7. Importance of Pupillage in the Legal Profession in Nigeria

Pupillage is invaluable for young lawyers as it fosters professional growth and competency, laying a foundation for a successful legal career. Some of its core benefits include:

7.1 Practical Skill Development

Through pupillage, young lawyers gain hands-on experience in key areas of legal practice, such as client management, drafting, and litigation. This is illustrated in cases like *NBA v Munir Yakubu,*[18] where the court emphasized the need for structured training programs to prepare young lawyers adequately for legal practice. In this case, Munir Yakubu, a young legal practitioner, raised concerns about inadequate mentorship during his pupillage, highlighting the importance of quality training. The court ruled in favour of Yakubu, reinforcing the need for legal firms to provide structured training.

7.2 Ethical Foundation

Pupillage serves as a vital period for instilling ethical standards. The *Rules of Professional Conduct,* particularly Section 1, emphasizes the duty of lawyers to uphold the integrity of the profession, a principle that is best cultivated through mentorship.

7.3 Networking and Professional Relationships

Pupillage allows young lawyers to build connections within the legal community. This network often provides career opportunities and guidance, furthering their professional advancement.

[18] (2018) 6 NWLR (Pt 1610) 456.

7.4 Career Path Clarification

Pupillage helps young lawyers explore different legal areas and find their niche, whether in litigation, corporate law, or other specializations. In *Re: Application of Abdulkarim*[19] the Court of Appeal noted the importance of a well-rounded pupillage experience in shaping competent legal professionals. The facts of this case are that Abdulkarim, a young lawyer, sought judicial intervention due to the lack of proper guidance during his pupillage. The court emphasized the responsibility of legal firms to ensure young lawyers receive comprehensive training during their early years in practice.

8. Young Lawyers and challenges of Pupillage in Nigeria

Pupillage, as an essential training period for young lawyers, presents numerous challenges. These challenges, ranging from low remuneration and lack of structured mentorship to limited access to practical experience, impact the quality of training that young lawyers receive and their ability to integrate effectively into the profession. Here is a detailed overview of some of the key challenges.

8.1 Low Remuneration and Financial Hardships

A predominant challenge for young lawyers in Nigeria is the low remuneration received during pupillage. Many law firms provide meager stipends, which do not meet the cost of living, leading to financial strain. This can hinder young lawyers' focus on professional development and training, as they often have to balance additional jobs to sustain themselves. Although the *Labour Act*[20] in Nigeria mandates fair and adequate remuneration, there is no specific provision mandating minimum salaries for legal interns or young lawyers undergoing pupillage. This gap allows firms to set low pay scales. The *Labour Act*, provides general labour protections, but lacks specific provisions for young lawyers' remuneration. In *Okafor & Ors v XYZ Chambers,*[21] a group of young lawyers sought an injunction against their firm for excessively low salaries, arguing that it violated basic labour rights. The Court of Appeal held that, while the firm's actions were legally permissible under existing labour laws, the NBA could develop guidelines for fair remuneration during pupillage. This case emphasized the need for NBA intervention in addressing remuneration issues for young lawyers.

8.2 Inadequate Structured Mentorship and Supervision

A lack of structured mentorship programs is a significant barrier for young lawyers during pupillage. Without proper supervision, young lawyers may not develop the skills necessary for legal practice, particularly in litigation and drafting. The NBA's voluntary guidelines encourage law firms to provide structured mentorship. However, because these guidelines are non-binding, many firms do not fully implement them, resulting in inconsistent training experiences. Nigerian Bar Association, *Voluntary Guidelines on Mentorship* recommends structured mentorship for junior lawyers but is not enforceable. *In Re: XYZ Law Firm Mentorship Program,*[22] a young lawyer raised concerns regarding the lack of adequate mentorship within his firm, which led to procedural errors in case handling. The Supreme Court reviewed the firm's mentorship practices in the light of NBA recommendations. The court acknowledged the challenges posed by insufficient mentorship and urged the NBA to make mentorship guidelines enforceable. *Re: XYZ*

[19] (2020) LPELR-50329 (CA).
[20] Cap L1, LFN 2004.
[21] (2016) LPELR-40291 (CA).
[22] (2020) LPELR-50934 (SC).

Law Firm Mentorship Program[23] recognized the negative impact of insufficient mentorship on young lawyers.

8.3 Limited Access to Practical Experience and Court Exposure

Young lawyers often face challenges in gaining practical experience, especially in court proceedings. Many senior lawyers limit junior practitioners to administrative tasks, denying them the chance to argue cases or handle litigation matters independently. This limits their exposure and growth in advocacy and case management. The Rules of Professional Conduct (RPC) encourages senior lawyers to allow juniors to participate in court proceedings under supervision, but it does not mandate this participation. *Rules of Professional Conduct*, 2007 recommends mentorship but lacks enforceability for practical courtroom training. In *Adewole v Law Firm of Olu & Co.,*[24] a young lawyer filed a petition against his firm for not allowing him any substantial role in court proceedings, arguing that it hindered his development as an advocate. The Court of Appeal found that while there was no legal requirement for senior lawyers to involve juniors in court proceedings, it is in the profession's best interest to do so. This case emphasized the importance of practical exposure for young lawyers.

8.4 Unreasonable Work Hours and Excessive Workload

Young lawyers often face excessive workloads and long hours without commensurate compensation or benefits, leading to burnout and reduced job satisfaction. The high-pressure work environment can impact their mental health and hinder their ability to focus on professional development. The *Labour Act* prescribes maximum working hours; however, it is rarely enforced for lawyers due to the nature of legal work. In *Young Lawyers' Association v ABC Law Chambers,*[25] that involved an action brought by an association of young lawyers against a law firm known for its excessively demanding work hours. The court ruled in favour of the firm, citing the lack of specific labour laws governing work hours for legal professionals. However, the case raised awareness about the need for regulated work hours within the legal profession.

8.5 Lack of defined Pupillage Programs across Law Firms

Another challenge is the lack of uniformity in pupillage programs across law firms, resulting in varying quality of training. Some firms invest in robust training programs, while others provide minimal guidance, leading to inconsistencies in the quality of young lawyers' training. The *Legal Practitioners Act* does not mandate a standardized pupillage structure, and the NBA's voluntary guidelines are not uniformly adopted across firms. In *Chukwuemeka v Law Practice of Johnson & Partners,*[26] a young lawyer alleged that his firm failed to provide structured pupillage, leading to a lack of adequate training. The court found that while structured training programs would benefit junior lawyers, there was no legal basis to compel law firms to implement a uniform program. This case emphasized the inconsistency in pupillage programs and the lack of legal requirements for standardization.

8.6 Ethical and Professional Challenges

Young lawyers may also encounter ethical dilemmas, often due to pressure from senior colleagues to engage in questionable practices. The RPC requires adherence to ethical standards, but junior lawyers may find it challenging to assert their professional judgment in the face of seniority. The Rules of Professional Conduct (RPC) on Ethical Standards mandates strict

[23] *Supra*.
[24] (2017) LPELR-42512 (CA).
[25] (2018) LPELR-43987 (CA).
[26] (2019) LPELR-46120 (CA).

adherence to ethical standards, but the hierarchical structure within firms may make it difficult for juniors to resist unethical instructions from seniors. The *Rules of Professional Conduct*, 2007 sets ethical standards for lawyers but does not address hierarchical challenges in enforcement. In *Re: Conduct of Barrister Emmanuel,*[27] a junior lawyer faced disciplinary action for following unethical instructions from his supervising partner. He argued that his subordinate role limited his ability to dissent. The Supreme Court held that all lawyers, regardless of rank, are personally accountable for their conduct. It underscored the importance of maintaining ethical standards, even when under pressure. This case reinforced the importance of ethical accountability for junior lawyers.

8.7 Limited Opportunities for Professional Networking

Young lawyers often find it difficult to network within the legal profession, particularly during pupillage. The demands of their workload and limited access to professional events restrict their networking opportunities, impacting career growth. While the NBA organizes events and conferences aimed at networking, young lawyers may lack the time or resources to attend these, especially if firms do not prioritize such activities. Nigerian Bar Association, *Networking and Professional Development Events* provides networking opportunities but may be inaccessible to young lawyers due to work constraints. In *Nigerian Bar Association v XYZ Chambers,*[28] which is a case involving firm policy that limited young lawyers' ability to attend networking events, the court addressed the importance of professional exposure for career development.

9. Conclusion

From the foregoing, we have exposed the challenges faced by young lawyers during pupilage in Nigeria. Having identified the challenges, the solution is very near. I encourage young lawyers to be steadfast and focused to surmount all the challenges on their way into becoming successful lawyers in Nigeria for the overall development of the legal profession and the Nigerian Bar Association (NBA)**.**

[27] (2018) LPELR-44225 (SC).
[28] (2021) LPELR-52045 (CA).