

Filed on 12/05/2026
at 1:50 am/pm
Registrar
DIVORCE AND MATRIMONIAL COURT '21
ACCRA G/R
Dmb569/21

IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
DIVORCE AND MATRIMONIAL DIVISION
ACCRA - A.D. 2026

Suit No.

BETWEEN

MRS. JOANA QUAYE ... **Petitioner/Appellant/Applicant**
H/No. 8, Jaffa LN (GA-556-0397)
Dansoman, Accra

AND

RICHARD NII ARMAH QUAYE ... **Respondent/Respondent/Respondent**

(Applicant will direct service)

**NOTICE OF MOTION:
APPLICATION FOR INJUNCTION PENDING APPEAL**

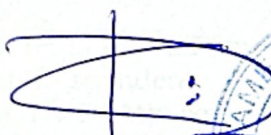
TAKE NOTICE that this Honourable Court shall be moved on ^{THURSDAY} the ~~2ND~~ day of ~~JUNE~~ 2026 at 9 O'clock in the forenoon or so soon thereafter as Counsel for and on behalf of the Petitioner/Appellant/Applicant herein may be heard on an application praying this Honourable Court for an order of injunction restraining the Respondent/Respondent/Respondent herein whether by himself, his servants, agents and assigns from transferring, disposing of, or in any other way alienating the properties directly acquired by the parties during the marriage between the parties and indirectly acquired by the parties through companies owned by the parties, including the ones listed below, pending the determination of the appeal filed by the Applicant against the "Final Orders" of this Honourable Court dated 20th January, 2026:

- i. Shares owned by the parties directly in Quick Credit and Investment Money Lending Limited (subsequently renamed "Quick Credit & Investment Micro-Credit Limited" and now renamed "Bills Micro Credit Limited");
- ii. Shares owned by the parties directly in Quick Angels Company Limited;
- iii. Shares owned by the parties directly or indirectly in Waterfall Engineering Limited;
- iv. Shares owned by the parties directly or indirectly in Tigon Entertainment Limited;
- v. Shares owned by the parties directly or indirectly in JenamGh Company Limited;
- vi. Shares owned by the parties directly or indirectly in Alcilla Farms Limited;
- vii. Shares owned by the parties directly or indirectly in Ridge Medical Centre Limited;

- viii. Shares owned by the parties directly or indirectly in Coli Link Ghana Limited
- ix. Shares owned by the parties directly or indirectly in CEQA Foods and Beverages Gh. Limited;
- x. Five-bedroom house at Trasacco Estates (Phase II), Accra;
- xi. House at East Legon, Accra (situate on Parcel No. 72, Block 2, Section 075, Dzornaman - Adjiringanor, Accra);
- xii. Gated storey-building house at No. 8 Jaffa Ln, Dansoman, Accra, commonly known by the parties as Dreamland;
- xiii. Five-bedroom house at Mamprobi, Accra
- xiv. Parcel of land at Mamprobi, Accra on which a mechanic shop is situated;
- xv. Rolls Royce Phantom vehicle with registration number DV 5264 E;
- xvi. Bentley Coupe with registration number DV 5268 E;
- xvii. Range Rover Vogue with registration number GN 2271 - 18;
- xviii. Range Rover Velar with registration number M 20 - 20
- xix. Mercedes Benz "G Wagon" vehicle;
- xx. Lexus 4 X 4 Vehicle;
- xxi. All vehicles and movable properties acquired during the subsistence of the marriage between the parties;
- xxii. All immovable properties acquired by the parties directly and indirectly through companies owned by any of the parties the during the subsistence of the marriage between the parties.

And for any further order(s) as to this Court may seem meet.

**DATED AT DAME & PARTNERS, CANTONMENTS, ACCRA THIS
11TH DAY OF MAY, 2026.**


GODFRED YEBOAH DAME
 Solicitor's Licence No: **eGAR04164/26**
DAME & PARTNERS
 Chamber Reg. Licence No: **ePP00296/26**
 Lawyer for Petitioner/Appellant/Applicant

BP 57967

**THE REGISTRAR
HIGH COURT
DIVORCE AND MATRIMONIAL DIVISION
ACCRA**

**AND TO THE ABOVE-NAMED
RESPONDENT/RESPONDENT/RESPONDENT**

Filed on 13/05/2026
at 1:50 am/pm
Registrar
DIVORCE AND MATRIMONIAL COURT "2"
ACCRA G/R

**IN THE SUPERIOR COURT OF JUDICATURE
IN THE HIGH COURT OF JUSTICE
DIVORCE AND MATRIMONIAL DIVISION
ACCRA – A.D. 2026**

Suit No.

BETWEEN

MRS. JOANA QUAYE ... **Petitioner/Appellant/Applicant**
H/No. 8, Jaffa LN (GA-556-0397)
Dansoman, Accra

AND

RICHARD NII ARMAH QUAYE ... **Respondent/Respondent/Respondent**

(Applicant will direct service)

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR
INJUNCTION PENDING APPEAL**

I, **JOANA QUAYE**, of H/No. 8, Jaffa LN (GA 556 – 0397), Dansoman, Accra, make oath and say as follows:

1. That I am the deponent hereto, the Petitioner/Appellant/Applicant herein and depose to this affidavit in respect of matters within my knowledge, information and belief.
2. That as far back as 2002, I entered into an amorous relationship with the Respondent/Respondent/Respondent (hereinafter referred to simply as "Respondent") when we both completed senior secondary school.
3. That the Respondent and I contracted a civil marriage under the ordinance in accordance with the **Marriages Act, 1884-1985 (Cap. 127)** on **4th December, 2010**.
4. That as a result of gross abuse and unreasonable behaviour by the Respondent, including unbridled cheating with many women, and severe physical violence inflicted on me at various times, I initiated proceedings for the dissolution of the marriage.
5. That the incidents of violence of the Respondent towards me are recorded in various complaints I lodged with the Ghana Police Service, none of which has seen the light of day owing to what I suspect to be undue interference by certain personalities acting as agents for the Respondent.

6. That on **20th January, 2026**, this Honourable Court coram *Justin Dorgu JA* (sitting as additional High Court Judge) delivered what the learned judge claimed was the conclusion of his judgement. Contained in it were "Final Orders" in which the learned judge granted to me one-third of a house at Dansoman, Accra, three hundred thousand Ghana Cedis (GH¢300,000) as financial settlement and GH¢5,000 to be paid monthly by the Respondent for the upkeep of the three children of the marriage, custody of whom the Court had given to me. Attached herewith and marked as "**Exhibit JQ1**" is a copy of the said Final Orders.
7. That for over three months, a copy of the full judgment of the Court was unavailable since according to the Registry of this Court, the judge had not finished writing same.
8. That following this bizarre development, I instructed the firm of Messrs. Dame and Partners, to institute an appeal against the judgment of the Court in view of the implications for my constitutional right of appeal as a citizen of this country.
9. That on Wednesday, 22nd April, 2026, the law firm representing me was informed that the judgment of the Court was now ready (**more than three months after the date of delivery of the Final Orders in the matter, and three (3) clear days after my right of appeal had expired**). Attached herewith and marked as **Exhibit JQ2** is a copy of the judgment of this Court.
10. That a search conducted at the Registry of the High Court to ascertain when the full Judgment was presented to the Registry of this Court revealed that same was only presented to the Registry on **20th April, 2026 – one day after the expiry of my right of appeal**. Attached herewith and marked as **Exhibit JQ3** is a copy of the results of the Search conducted at the Registry.
11. That I am advised by counsel and verily believe same to be true that the serialisation of the judgment on my divorce petition, effectively resulting in two versions of the judgment of the Court – one containing the Final Orders with reasons delivered on 20th January, 2026, which I appealed against, and one purporting to be the full Judgment containing the further reasons for the Orders but which was released on 20th April, 2026 after the expiry of my right of appeal – violated my constitutional rights as a litigant before this Honourable Court.
12. That I am advised by counsel and verily believe same to be true that the appeal filed raises substantial question of law and fact for determination by the Court of Appeal, bordering on my fundamental constitutional rights as a spouse married under the laws of Ghana. Attached herewith and marked as "**Exhibit JQ4**" is a copy of the appeal filed.

13. That to set the appropriate context for my application, the brief facts of my relationship with the Respondent are that, after 2002, we continued with our love relationship as we pursued our tertiary education at the Institute of Professional Studies (IPS) now University of Professional Studies, Accra (UPSA), and through various phases of our lives culminating in a marriage under the ordinance on 4th December, 2010.
14. That owing to difficulties in funding our tertiary education out of savings from some jobs we were engaged in, at the request of the Respondent, I dropped out of my Diploma in Business Studies programme at the now UPSA in order to work further and support the Respondent who had expressed the intention to definitely marry me. I took up more jobs at Frankies, Osu and On the Run Restaurants to support the Respondent.
15. That while still dating, Respondent and I opened a joint account with SG SSB Ltd and subsequently, jointly invested the funds in that account in an investment transaction operated by Data Bank Ltd. This investment matured and was redeemed by us with a maturity value of GH¢10,151.17 in **2008**.
16. That the Respondent who had then finished his course at the UPSA, took the said amount with the understanding that he would utilise it to fund his travel to the United Kingdom (UK) in **2008** to pursue further education in Accounting. Attached herewith and marked as **Exhibit "JQ5"** is a copy of a statement of the said investment account with Databank Limited (tendered at the trial).
17. That relying on earnest and compassionate representations by the Respondent that he wanted to come and marry me on the completion of his programme in the UK, I continued to support the Respondent with income generated from various jobs I did in Ghana, including employment with Unibank Limited, Kaneshie branch.
18. That in **2009**, the Respondent returned from the UK unemployed, and we started exploring means of setting up a business for him. I closed my personal bank account by withdrawing all my savings and used same as seed money to start a micro-finance enterprise, which we named Quick Credit, within six months after the Respondent had returned from the UK.
19. That in **2011**, a year after we had gotten married, we jointly set up a company called Quick Micro Credit and Investment Money Lending Limited (now unilaterally renamed Bills Micro Credit by the Respondent). Together with the Respondent, I was a shareholder at the incorporation of the company, in demonstration of the intention to jointly acquire and own properties in the marriage, as is customary in

marriage. I was also, together with the Respondent, the only directors of the company. Attached herewith and marked as “**Exhibits JQ6**” and “**JQ7**” are extracts from Particulars of the company, Quick Credit, filed at the Office of the Registrar of Companies and the results of a Request for Information delivered by the Office of the Registrar of Companies.

20. That Quick Credit grew and became the foundation and vehicle for the setting up of other companies and acquisition of properties during the marriage. This is evidenced by **Exhibit JQ7** - the results of the Request for Information delivered by the Office of the Registrar of Companies.
21. That as was admitted at the trial by the Respondent, unknown to me, the Respondent around 2017, altered the records of the company by unlawfully removing me as a shareholder of Quick Credit, and around 2021, proceeded to remove me as a director of the company. Attached herewith and marked as “**Exhibit JQ8**” is a certified true copy of the record of proceedings in this Honourable Court showing the cross-examination of the Respondent by my lawyer on 13th March, 2024.
22. That I am advised by counsel and verily believe same to be true that the conclusions of the learned judge were arbitrary, discriminatory and a complete departure from the principles governing the equitable distribution of marital property upon the dissolution of marriage enshrined in the Constitution and laws of Ghana, and as affirmed by the Supreme Court in numerous decisions.
23. That I am further advised by counsel that having regard to the peculiar facts of this case, manifest injustice has been worked against me by the decision of this Honourable Court and for that matter, the Respondent ought not to be given the opportunity to dissipate the property acquired during the subsistence of the marriage pending the determination of the appeal.
24. That I am advised by counsel and verily believe same to be true that, with the greatest respect, subjective considerations like my “*physical attractiveness*”, “*capability of remarrying anytime I like*” and the need to “*dissuade divorce*”, which informed the award made, are inapplicable in the sharing of marital property, and therefore render the judgment per incuriam and perverse.
25. That I am further advised by counsel and verily believe same to be true that the fact of the acquisition by the parties of all the properties (including the shares in the companies in question) after the marriage, directly or indirectly, dictates that the shares in the various companies were marital assets to be distributed equitably, irrespective of whether there was an agreement between the parties or not.
26. That apart from the ownership of Quick Credit (now unilaterally renamed Bills Micro-Credit by Respondent) and various contributions

I made towards the life and growth of the Respondent evidenced in the documents attached herewith, I contributed in diverse forms as a wife of 16 years and the mother of three children is ordinarily expected to.

27. I am advised by counsel and verily believe same to be true that it is thus completely unconstitutional, unlawful and inequitable to hold that I am entitled to only one-third of a house at Dansoman and GH¢300,000. as my share of all the properties acquired during the marriage.
28. That I am advised by counsel and verily believe same to be true that this Honourable Court was bound by **Article 22(3)(b)** of the Constitution and **Section 20(1)** of the **Matrimonial Causes Act, 1971 (Act 367)** to make an equitable distribution of the properties, which in my peculiar case, I assert to be an equal share in all the properties of the marriage.
29. That I am advised by counsel and verily believe same to be true that the refusal of this Honourable Court to make an order distributing the shares in Quick Credit between us was an unfortunate dereliction or abdication of duty as all properties acquired during the marriage, including shares in companies, fall for an equitable distribution upon the dissolution of the marriage.
30. That the formation of Quick Credit by us and our joint ownership of shares in that company became the springboard for the Respondent's wealth and acquisition of various properties by him.
31. That the Respondent used Quick Credit and Quick Angels to acquire other companies and deployed the companies as a vehicle for the acquisition of various immovable and movable properties.
32. That it is a fact that most of the vehicles acquired during the marriage are in the name of companies owned by the Respondent and other companies which are in turn owned by companies set up during the subsistence of the marriage.
33. That the Respondent lives in the Trasacco House with his concubine (one of the numerous girlfriends he started dating during the subsistence of the marriage – Mona Montrage aka Hajia For Real), for instance is in the name of a company owned and acquired during the subsistence of the marriage.
34. That the Respondent acquired all the vehicles listed on the motion paper, including the Rolls Royce Phantom, Bentley Coupe, Mercedes Benz "G Wagon", Lexus 4 X 4 Vehicle, Range Rover Velar, and Range Rover Vogue in the course of the marriage.

35. That it is important that this Honourable Court through the exercise of its equitable jurisdiction, preserves and protects all these asset from a dissipation pending the determination of my appeal lodged at the Court of Appeal, since any disposal, transfer or alienation of any of the properties in the interim, has the profound tendency to work a substantial miscarriage of justice in this case and also, to subject me to irremediable hardships and injustice.
36. That the Respondent has demonstrated an ability to unlawfully transfer assets acquired during marriage since he, without my knowledge, transferred my shares in Quick Credit Limited. I became aware of this only when he admitted this fact under cross-examination in this Honourable Court – **Exhibit JQ8**.
37. That if the Respondent is not restrained in the manner prayed for in the motion paper and the Court of Appeal eventually upholds the merits of my appeal, irreparable damage and a travesty of justice would have been occasioned me as there will be no assets to be shared equitably between us.
38. That I am advised by counsel and verily believe same to be true that in the event of a success of my appeal, same would constitute an empty legal shell as the Respondent would have severely punished me with his actions, and almost the whole of my adult life would have gone down the drain considering that I started dedicating my life to the Respondent right after secondary school.
39. That I am finally advised by counsel and verily believe same to be true that the substantial miscarriage of justice and the hardships that would be occasioned me by a disposal or sale of the assets, in the event of a denial of the instant application, is sufficient to warrant the grant of an injunction pending the determination of the merits of my appeal in terms prayed for on the motion paper.

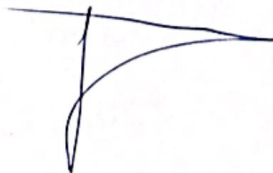
WHEREFORE I humbly swear to this affidavit.

SWORN IN ACCRA THIS 12th DAY)
OF MAY, 2026)


DEPONENT

BEFORE ME

JOSEPH DICKSON
P. O. BOX 05 2168
OSU-ACCRA
COMMISSIONER FOR OATHS
COMMISSIONER FOR OATHS



Page 8 of 8