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Your Ref

Our Ref THD/101150/JH

11 March 1996

Dear Sir

Cameroon v. Nigeria: Request for Interim Measures.

We are instructed by the Agent for Nigeria to reply to your letter of 8 March 1996, about the second Cameroon dossier of documents lodged with the Court at its sitting on 8 March. You informed our Clients that the Court had decided that Nigeria should have the opportunity to submit to the Court by 1 p.m. on 11 March such comments as it would wish concerning those documents.

Our Clients are grateful to the Court for this opportunity.

Our Clients have considered the Cameroon documents as carefully as the circumstances have permitted. They have only the following comments to offer.

(1) Generally, the documents in this dossier call for the same comments as those offered by Counsel for Nigeria on 8 March, when referring to the previous Cameroon dossier.

(2) In particular

(a) a number are illegible, or only barely legible; thus the photographs at Tab P are wholly indistinct.

(b) several of the documents are incomplete in material respects: thus, a letter of 21 November 1976 (at Tab P) is meaningless without being completed by a copy of the letter to which it is the reply, while the document at Tab K (a list of alleged frontier incidents) does not (at least in the copy available to Nigeria) say in which year or years the alleged incidents took place.

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(3) Some documents are wholly or in large part irrelevant: thus many of those alleged incidents would appear to have taken place well outside Bakassi and to that extent they, like the maps submitted with them (which purport to show the border from Lake Chad to the sea), are wholly irrelevant to the immediate issues.

(4) Some are repetitive: for example the papers at Tab P contain three copies of the same letter.

Many of the assertions made in the documents relate to events which, even if they had occurred, would be self serving: our Clients reserve the right at any appropriate stage in the proceedings to make further comments on such matters as the Idabato Health Centre.

Our Clients do not, however, consider that the documents call for any more detailed comment at this time on an individual basis. They do not, in our Clients' opinion, materially assist in the consideration to be given to Cameroon's Request for interim measures, and do not call for any modification to the arguments presented to the Court on behalf of Nigeria.

Yours faithfully

