

REPUBLIC OF KENYA
IN THE EMPLOYMENT & LABOUR RELATIONS COURT AT NAIROBI
PETITION NO OF 2020

IN THE MATTER OF ARTICLE 19(1) and (2) OF THE CONSTITUTION
AND
IN THE MATTER OF ARTICLE 20(1) AND (2) OF THE CONSTITUTION
AND
IN THE MATTER OF ARTICLE 22(1) OF THE CONSTITUTION
AND
IN THE MATTER OF ARTICLE 25(a) OF THE CONSTITUTION
AND
IN THE MATTER OF ARTICLE 28 OF THE CONSTITUTIO
AND
IN THE MATTER OF ARTICLE 29(d) AND (f) OF THE CONSTITUTION
AND
IN THE MATTER OF ARTICLE 36 (1) OF THE CONSTITUTION
AND
IN THE MATTER OF ARTICLE 41(1) (2) a, b & c AND (5) OF THE
CONSTITUTION
AND
IN THE MATTER OF SECTIONS 40, 35(5), AND 45 OF THE EMPLOYMENT
ACT
AND
IN THE MATTER OF SECTION 54 (1) OF THE LABOUR RELATIONS ACT,
NO.14 OF 2007
AND IN THE MATTER OF UNFAIR, UNLAWFUL TERMINATION OF
EMPLOYEES OF MEDIAMAX NETWORK LIMITED.

KENYA UNION OF JOURNALISTS.....PETITIONER

VERSUS

MEDIAMAX NETWORK LIMITED.....RESPONDENT

KEN BOSIRE
JOAB MWAURA
CAROLINE MWANGI
CALEB RATEMO
ALBERT AMONYOLE
VICTOR OLOO
SHACKRI WACHA
PARTIES
DENNIS NYAMU
JAMES KARIUKI
NGETICH NEVOLLE
CHEROTICH TERER
ELIZABETH W. NJOROGE
CAROLINE NJENGA

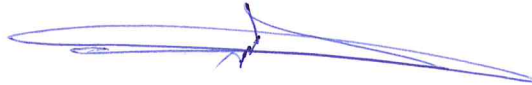
INTERESTED

CERTIFICATE OF URGENCY

I, **IBRAHIM ODUOR**, an Advocate of the High Court of Kenya who have the conduct of this matter on behalf of the Petitioner **HEREBY CERTIFY** that the Notice of Motion filed herewith is **EXTREMELY URGENT** and deserves to be placed before the Honourable Judge immediately for the following **REASONS**:

1. That on 21st June 2020, in a show of unbridled impunity and contempt to the fundamental human rights of its employees, the Respondent vide a text message sent out in the middle of the night, summarily terminated the Interested Parties Employment, in a process that was unfair, unlawful and outrightly inhumane and continues to withhold their salaries for the months of April, May June, payment in lieu of notice as well as other lawful terminal dues.
2. That the Petitioner requires records and documentation exclusively held by the Respondent, to wit, criteria for alleged redundancy as well as computation of the purported of terminal dues payable to the Interested Parties. The same are required for purposes of protection of the rights of the Interested Parties hence this application is brought under Article 35 (1) (b) of the Constitution as well as under the Inherent powers of this Honourable Court, and particularly for determination of this suit.

Dated at Nairobi this 28th Day of July 2020



ODUOR IBRAHIM
ADVOCATE FOR THE PETITIONER

DRAWN & FILED BY:

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