WOMEN'S INHERITANCE RIGHTS IN YORUBA CUSTOM AND THE ISLAMIC LAW: A COMPARATIVE ANALYSIS

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Abstract

Inheritance is an age-long tradition in the human society. Although the inheritance custom differs from one culture to another, it is established that in most cases women receive the brunt of the traditions. This is particularly the case in the Yoruba custom. It is yet note-worthy that Islam gained prominence in Yorubaland and Muslims constitute a simple majority of the population. Traditionally, the Yoruba people have their established inheritance system while Islam has its distinct legal provisions on estate distribution which supposedly should be embraced wholly by all its adherents regardless of race, colour and gender. This scenario and the inescapable influence of one culture on the other often generate conflict of interest in estate distribution among the Yoruba Muslims where syncretism is deep rooted. Generally, women are the most vulnerable in such conflicts. This prejudice prompts the need for a comparative study on the provisions of the two systems on the women's inheritance rights with a view to distinguishing the pristine teachings of Islam and advocate its entrenchment among the Muslims. The research involves interview, observation, and analytical studies of relevant library materials and court records. Findings revealed that the Yoruba custom exploits the women folk while the Islamic law provisions guarantees their inheritance rights. The paper concludes on the recognition of the Islamic legal dispensation as a revolution that protects the interest of women and it therefore proffers recommendations for upholding it among the Yoruba Muslim women.

Keywords: Inheritance rights, Women, Yoruba, Islamic law, *idi-igi*

Introduction

Historically, inheritance is an age-long tradition in the human society[1] in which life and death are natural phenomena. As man comes into this world without any material property, so he exits without taking away anything with him. Therefore, upon death, all his worldly possessions, regardless of their sources, devolve automatically on his survivors in the case of physical property while sometimes his abstract possessions which are not heritable revert to the authority that granted such on him in the first instance.

Inheritance is a universal tradition though its practice differs from one society to another. It is worthy of note that in most societies, women have suffered the brunt of the customary beliefs and practices; the greatest of which is more conspicuously noticeable in the inheritance traditions. The Yoruba[2] customary practice – where a widow neither has a say in the administration of the estate of her late husband nor benefit any share by inheritance – is no exception. This presupposes that the Yoruba have distinct tradition on inheritance just as it has on other aspects of human life i.e. birth, naming, marriage, death, burial and funeral, etc.

Islam spread to Yorubaland through the Northern Nigeria as far back as the sixteenth century; but it subsequently gained prominence with the predominant influence of the *'ulama'* (Islamic scholars) from Ilorin.[3] Customarily, as Islam spread it introduced its culture, inclusive of the inheritance rules, which the believers ought to embrace wholly. Thus, the co-existence of two distinct cultures instigated conflict of interest. In effect, it is observed that many Yoruba Muslims either choose which of the two systems was found to be more suitable at a particular time, or make amalgamation of the provisions of the two systems or out-rightly adopt the age-long Yoruba customary practice in preference to the Islamic law provisions. Yet, other Muslims are completely faithful to the *shari'ah* (Islamic law) rules.

Therefore, the thrust of this paper is an investigation on the inheritance rights of a woman both in the Yoruba and the Islamic law with a view to making a comparison of the two systems and sieve the wheat from the chaff. Essentially, the paper focuses on the concept and nature of inheritance; inheritance culture among the Yoruba as it affects the women; women's inheritance rights in Islam; and comparison between the two cultures. In the conclusion, some recommendations were proffered with a view to arresting the menace of syncretism.

Conceptual Discourse

Etymologically, inheritance is conceived as "money, property, or a title received on the death of the previous owner".[4] It is "the fact of receiving something when somebody dies".[5] In legal parlance, it refers to "property which descends to a heir on the death of the owner".[6] Operationally, the word inheritance is synonymous with succession which legally connotes, among other definitions, "the process of becoming entitled to property of a deceased by the operation of law or a will".[7] Moreover, succession is defined as "the acquisition of rights or property by inheritance under the laws of descent and distribution".[8] Thus, the two words i.e. 'inheritance' and 'succession' are used interchangeably to mean the same thing; presuming that inheritance may take place either through testate or intestate succession.

In Islam, inheritance (*wirathah*) has various connotations. It could mean taking over a title, position, attribute, value etc from someone by another as reflected in the story of Sulayman and Dawud (Q.27:16), or progeny who replaces someone after his death as

portrayed by Zakariya's plea to Allah for an offspring (Q.19:5-6), or the absolutism of Allah as the Real Owner of the universe to Whom its possession reverts upon the extinction of mankind (Q.19:40; 28:58). However, in the Islamic legal terminology, when *wirathah* changes to its noun form as *Mirath* (succession) it refers to the process of gathering, evaluating and sharing the property of a deceased person among his legitimate heirs.[9] Similarly, inheritance is termed as *fara'id* (decrees; ordinances; or fixed shares) being derived from the fact that allotment of shares are divinely determined (Q. 4:11). Thus, the three terminologies namely *wirathah, mirath* and *fara'id* are used interchangeably to define inheritance in the *shari'ah*. Apparently, in Islamic law, inheritance purely involves intestate succession which is being carried out under divine decrees whereas bequest or testamentary disposition (*wasiyyah*) is an independent entity both of which though have influence on one another during execution consequent upon the death of the owner of the property.

The Yoruba was acclaimed to have originated from Ile-Ife.[10] While it is on record that over three hundred and fifty ethnic groups are found in Nigeria today, the Yoruba people constitute about 21% of the Nigerian population.[11] They are overwhelming majority in the South-West, as well as parts of the North Central regions. The Yorubaland covers Oyo, Osun, Ogun, Ondo, Lagos, Ekiti, and parts of Kogi and Kwara States of Nigeria.[12] Muslims were identified as 63% of the Yoruba populace in Nigeria; thus, constituting a simple majority.[13] Yorubas are yet found in some other parts of West Africa like Dahomey, Sabe and Anago in the eastern part of Benin Republic and Atakpame in the central part of Togo.[14] However, since history traced their origin to Nigeria, suffice it that the present study is limited to the Nigerian Yoruba Muslims.

Women, within the context of this study, include wife or widow, mother, daughter(s), and other female relations to the deceased who primarily are his heirs. The research therefore investigates the entitlements of the women to inheritance among the Yoruba and compares same with the provisions and application of the inheritance legislations in Islamic law.

Inheritance Culture among the Yoruba

Culturally, Yoruba is a patriarchal society. Among its people, family integration occupies a pre-eminent place. Yet, inheritance is traditionally agnatic in nature whereby blood relationship is essentially the basic factor to qualify for it.[15] Therefore, as a non-agnatic relation, a widow has no right to inheritance regardless of the depth of affinity with her late husband; rather, she is considered as part of the heritable property. This is encapsulated in the Yoruba adage that "*jije-mo ogun ni obinrin*" i.e. "women are themselves heritable" in the Yoruba custom.[16] A widow could only benefit from the property of the deceased through the shares allotted to her child(ren) if she had begotten any for the deceased. A childless widow is in this case inherited as part of the deceased's estate or treated with apathy.[17] This principle inspired the appeal in *Ologunleko v.*

Ikuemelo and others[18] at the Court of Appeal, Benin Division as well as it applied in *Eyesan v. Sanusi*[19]at the Supreme Court, Lagos. In the same vein, an adopted or a foster child is equally not entitled to inherit the deceased.[20] Moreover, a slave, presumably freed, is not entitled to inherit the master but on some special considerations or financial contributions to the funeral rites of the latter, the former might be given a concession. This is because the Yoruba tradition holds that members of the deceased's family should contribute to his funeral expenses and that no one could benefit from the deceased's property if he/she had not made such a contribution.[21] In this case a slave is recognized as a non-agnatic relation.

In the old Yoruba tradition, the children have no primary right to inherit their father's property whereas the principal beneficiaries of a deceased person were his siblings, male and female. At best, the children compete with the half-brothers and sisters as well as the children of the full sisters to benefit from the remnants of the estate after the siblings might have satisfied themselves in the shares.[22] Yet, among the children, there is preference for the primogeniture in some rights. Given the dynamic nature of man and his environment, the old social order became reviewed at the deliberative council held in Ibadan in 1858CE to grant children the right of principal beneficiaries in their parents' estate.[23] None-the-less, the extant practice sparsely remains among few ethnic groups in Abeokuta, Ijebuland and Ondo among others. Besides, there is discrimination between products of legitimate marriage[24] and children begotten by a slave mother. The former has preference and better shares over the latter; except by discretion of the elders on the ground that they cannot inherit from elsewhere not even from their mothers who remain as slaves.[25]

For the purpose of inheritance, the estate is classified into two; namely moveable and immoveable properties. The former include all the self-acquired possessions consisting of clothing, house-hold furniture, farming implements, swords, musket guns, domestic animals, horses, persons pawned to him for debt, slaves and widows etc. The immoveable properties include houses, land, and farmland. The moveable properties, including widows, are shared among the male and female siblings. Younger widows are inherited by the junior brothers of the deceased or any of them who fell to the lot of a full sister could be inherited by the latter's son. Similarly, half-brothers and a full grown son of the deceased, preferably the eldest, compete to inherit among the widows whenever there was a sufficiently large number of them available.[26] It is note-worthy that customarily, it is considered as a taboo among the Yoruba for a senior person, male or female, to inherit the junior one who might predeceased the former. Hence, the Yoruba adage: "*otosi egbon niijogun aburo, olori buruku baba niijogun omo*" meaning "it is a wretched senior that inherits the junior, and it is an unfortunate father that inherits the child".[27] Thus, this tradition precludes the mother, senior sisters and other senior relations of the deceased from inheriting his estate. Under a normal circumstance, landed properties are treated as family property with joint ownership status. Hence, no one lays claim to it but the eldest son takes over its custody. Whenever there was the need for partitioning, factors like age

and sex of the children were considered in determining the allotment of the beneficiaries. Invariably, a female child regardless of her age used to take the last with lesser share to that of her male counterparts.[28]

Among the Yoruba, distribution of the deceased's property often takes one of two forms. These are testate and intestate succession. Testate succession is the passing of rights or property by will.[29] This is a situation where the testator declares how his property is to be shared, how and where to be buried and provisions may be made for his wife, children and other relations as it pleases him.[30] The survivors are under obligation to execute the declaration to the letter; otherwise violation or abuse of the will is challengeable either in the native courts or through the mass media social network programmes.[31] On the other hand, intestate succession is deemed in a situation where a person dies without making a testamentary declaration concerning the distribution of his estate upon his death. Therefore, more often than not, recourse is made to the Yoruba customary law for inheritance. Generally, the custom consists of two systems; namely: *idi-igi* (sharing per stripe) and *ori o jori* (sharing per capita).[32] The *idi-igi* is a system of distributing the estate according to the number of wives that bear child(ren) for the deceased.[33] It is the primitive system that operates in a polygamous setting which guarantees the right of every child equally regardless of sex or age. On the aggregate, the system is fair to all; yet it is exploitative to a group with larger number of children and solicitous to another with fewer children. This was applicable, for instance, in the suit that involved *Humuani Salako & Ors v. Refatu Salako.*[34] Without prejudice to the status of widows in the Yoruba inheritance custom, it is discernible that children are the principal concern in this system using the maternal affiliations only as means to an end. Hence, the *idi-igi* system does not embrace a childless wife nor precludes child(ren) of a divorced or pre-deceased wife.[35] The *ori o jori* is a system whereby the children are considered for inheritance on an equal basis in proportion to the total estate regardless of their maternal affiliations. This is a modern approach and characteristically equitable to all the children. None-the-less, variance is noticeable in the practices of the two systems in different Yoruba localities based essentially on ethnic peculiarities or religious inclinations.[36] For instance, in some parts of Ondo state, approach to the *idi-igi* system grants greater allotment to the stripe of the senior wife above that of the junior.[37]

Women's Inheritance in Islamic Law

The Islamic legislation on inheritance is derived primarily from the Qur'an (Q. 4: 7, 11-12 and 176). The divine prescriptions are further expounded in the Prophetic traditions[38] and subsequently amplified by the jurists. Apparently, the Qur'anic laws are more favourably disposed to the Muslim woman, regardless of her rank, in anticipation of guaranteeing her self-identity. Pertinently, she is regarded in Islamic law as a legitimate heir irrespective of her socio-economic status; provided her right is not legally impaired.

In determining the legal heirs, the bases of claim to inherit arise from four types of relationship namely consanguine (i.e. blood), marital, client (*al-wala'*) and religious

fraternity.[39] Thus, any Muslim woman who bears kinship with the deceased in any of these divisions is naturally a legitimate heir. For the blood and marital relations, the law approves of the rights of both the male and female heirs to inherit. The law recognizes a total of twelve sharers out of which eight are females. Such female heirs are the wife, daughter, mother, sister (full, half and uterine), son's daughter and grandmother. The client (*al-wala'*) involves slave–master relationship; in which the praepositus was a freed slave and he/she died without any survivor other than his/her former master or *vice–versa;* or where the survivor has no legitimate right to inherit the total estate, the residue shall be inherited by the client. Religious fraternity embraces Islamic brotherhood which necessitates inheritance of the property of a deceased Muslim by fellow surviving Muslims through the *baytu 'l- mal* (public treasury) in the absence of any survivor through blood, marriage or slave-master relationship.[40]

Islamic law normally recognizes the right of the survivors, regardless of sex or age, to inherit part or whole of the latter's estate. However, such a right depends on the degree of the survivor's relationship to the deceased. Thus, the closer the survivor is to the deceased, the greater his/her chance to inherit. Consequently, the close relatives exclude the distant ones where possible either partially (i.e. by causing reduction in the shares of the latter) or completely (i.e. by outright expulsion).[41] Moreover, to ensure equitable distribution of the estate of the deceased among the survivors, Islamic law provides that an individual's right to inheritance should be devoid of fraudulence. Thus, equity must be borne out of justice. Hence, an apparent heir may forfeit her legitimate right to inheritance, irrespective of the degree of her relationship to the deceased, if she got indulged in the impediment cause.[42] Jurists identified the impediment factors to include: murder (culpable homicide), inability to determine who died before the other, slavery, still-birth, mutual imprecation, illegitimacy (of child), difference of religion and difference of territorial jurisdiction.[43]

In Islamic law, estate (*tarkah*) includes the totality of the properties i.e. money, movable and immovable assets that were left by the deceased after all required deductions have been made.[44] The Qur'an is explicit on the fact that "the distribution (in all cases) is after the payment of legacies and debts" (Q.4: 11-12). The legacies in this context refer to pre–death testament(s) of the praepositus, while debts are the obligations and liabilities that fall due on her before death but which were yet to be settled. Consequently, it is imperative that the cost of such commitments is deducted from the deceased's estate before the balance is subjected to distribution among her heirs. Those commitments include the goods in her possession (i.e. pledge, security, deposits etc.), funeral expenses, outstanding debts and *zakat* (legal alms tax), bequest which does not exceed one–third of the balance of the assets etc.[45]

The Qur'an is precise on the specific shares of the *'ashab 'ul-fara'id* (prescribed sharers) i.e. wife, daughter, mother and sister who are recognized, among others, as primary heirs while the rights of the son's daughter and grandmother as secondary heirs were based on

the principle of *ijtihad* (logical reasoning).[46] The prescribed Qur'anic shares are 1/2, 1/4, 1/8, 2/3, 1/3, and 1/6 which the primary heirs enjoy on specified conditions. The proviso for benefitting each of the shares include the presence or absence of child(ren) no matter how low, presence or absence of male counterparts, plurality of heirs of the same status etc. For instance, wife(s) inherits 1/4 of the estate in the absence of offspring or 1/8 when the late husband had child(ren) no matter the maternal source. Similarly, a daughter shares 1/2 if she is alone without a male counterpart while she forgoes it in the presence of a son who is to agnatize her; while in the presence of two or more daughters they share 2/3 jointly. Mother takes 1/3 in case the deceased son was childless but in the presence of any offspring or plurality of collaterals to the deceased, she benefits only 1/6. No primary heir forfeits her right except on condition of legal sanction by impediment or exclusion.

Comparative Analysis

It is discernible from the preceding expositions that inheritance in the Yoruba custom and the Islamic law share certain things in common as well as differ in many respects. The two are similar in the basic constituents of inheritance, namely: confirmation of death of the proprietor, existence of the heirs and availability of the estate. Thus, in both systems, inheritance cannot hold in the absence of any of these components. However, they differ largely in principles and practice. Essentially, Yoruba is a patriarchal society, the effect of which is mostly felt in under-playing the status of a woman in the principle of inheritance. Contrarily, Islam is gender-friendly; hence, it recognizes the independent right of each survivor regardless of sex or age. Invariably, the Islamic law recognizes the right of twelve sharers out of which eight are females. Moreover, the Yoruba is agnatic thereby acknowledging only the blood relations for inheritance to the detriment of others whereas the bases of claim to inheritance in Islamic law embrace relations by blood, marriage, slavery and faith.

Inheritance among the Yoruba is founded basically on the customary beliefs and practices by virtue of which it accommodated review of the status of the children in the inheritance scheme in 1858CE as well as entertained ethnic or religious peculiarities in the practice of its *idi-igi* tradition. Conversely, in Islamic inheritance law, the source of guidance is divinely originated, expounded by the *sunnah* (Prophetic traditions) and amplified by the jurists. Consequently, both in principle and practice, the Islamic law of inheritance is constant and universal.

In the Yoruba custom, the estate is categorized into moveable and immoveable entities with greater propensity for sharing the former among all and sundry while the latter is considered as family property which is traditionally not subject to distribution except circumstance so demands. On the other hand, Islamic law sums up the totality of every possession of the deceased after all legal deductions have been made as the estate which is to be computed for distribution among the heirs. Furthermore, the Yoruba custom admits testate succession in its entirety as a process for inheritance. This affords the praepositus the opportunity to dispose his/her property as so desired not minding any

sentiments attached to it. The Islamic law on the other hand distinguishes bequest from inheritance. It authorizes one-third of the net estate; yet, it is not admissible in favour of a legal heir.[47] It has been observed that the tradition of self-distribution of property before death, which is opposed to the Islamic law is prevalent among some Yoruba Muslims.[48]

The Yoruba, in its old tradition, considered the siblings as the principal beneficiaries. Not until the Ibadan review of 1858CE, the children were only made to be the second fiddle in competition with the half-brothers and sisters of the deceased to inherit the remnants. In addition, the Yoruba taboo against the inheritance of a younger person by his/her older relation precludes the mother and other senior relations regardless of their close relationship with the deceased from inheriting him/her. Contrarily, in Islamic law the acknowledged beneficiaries of blood relations include the ascendants no matter how high, descendants no matter how low, collaterals (i.e. both full and half) and the uterines. Therefore, age is legally not a barrier to inheritance in Islam. Moreover, Islam does not authorize any preference for the eldest child of the deceased whereas in some instances the Yoruba has preference for primogeniture. Both systems disapprove inheritance by an adopted or foster child but they differ in respect of slave's right. Islam admits the right of a client to inherit his/her former slave or master in the absence of any other relation of superior degree i.e. by blood or marriage while the Yoruba does not entertain the right of a slave to inherit except one with acceptable manners and/or who contributes to the funeral expenses of his former master.[49] Obviously, this position is subjective. Furthermore, the Yoruba discriminates in the shares of products of legitimate marriage and those begotten by a slave mother whereas the Islamic law treats the children equally as long as they are products of legal cohabitation and paternity is acknowledged. In addition, the slave mother (*ummu walad*) gains her freedom by virtue of the opportunity of giving birth to her master in lieu of inheritance if she were to be a wife.

In the typical Yoruba custom, a widow is not considered as a beneficiary in the inheritance scheme because of the perception that she is herself heritable as affirmed in the suit between *Bolaji & Ors v. Akapo & Ors.*[50] However, she could only enjoy from the allotment to her children through the *idi-igi* system. On the other hand, in Islamic law, a widow has an independent and inalienable right to 1/4 in case the deceased husband was childless or 1/8 if he was survived by any child. In a polygamous home, the number of widows shares the prescribed allotment on equal basis not minding seniority in marriage, length of the marriage nor child bearing. The *idi-igi* system among the Yoruba precludes a childless widow from the scheme and sometimes the tradition accords preference to seniority of the wives in allotment to the stripe of each of them. It was yet discovered that some Muslims tend to interpret the *idi-igi* as "distribution according to the number of wives regardless of whether or not they have children for the deceased".[51] The researcher observed that this is a misconception presumably arising from the Islamic perception; because traditionally the *idi-igi* system does not embrace a childless wife but cares for child(ren) of a divorced or pre-deceased wife along with those of subsisting one(s). Besides, some Muslims are influenced by the Yoruba heritage by borrowing from the *idi-*

igi approach while distributing the estate according to the principles of the Islamic inheritance law. This practice applies often especially in respect of distributing the landed property among several heirs in which case full siblings are joined together; though, with due recognition for their Islamic apportionments.[52]

Moreover, the *ori o jori* system characteristically grants equal right to all the children of the deceased whereas the Islamic law discriminates in its allotments to the male and female heirs depending on specific circumstances. Other than some exceptional cases, the law ordinarily concedes double the share of the female to the male as applicable to inheritance by daughter and son (Q.4: 11) or full sister and brother (Q. 4: 176).Although, this discrimination had often attracted criticism in various quarters,[53] its wisdom lies in the recognition of Islam for gender equity rather than equality. Therefore, considering the obligation of the male relations in maintaining the female counterparts, it is justified that the former inherits in larger proportion than the latter. None-the-less, the law apportions equal shares to the male and female in some cases. For instance, it allots the mother a share of 1/6, like the father, when one or both of them inherit(s) along with the deceased's offspring (Q. 4: 11). Similarly, the uterine sister is apportioned 1/6, like the uterine brother, in the estate of their late brother who was childless; but where the surviving collaterals are more than two, they all share 1/3 on equal basis regardless of sex (Q. 4: 12).

Conclusion

The paper had made a dissection of the women's inheritance rights in the Yoruba custom and the Islamic law. Apparently, the two systems are distinct yet there are bases of comparison which constitute the focus of the present work. The paper identified the similarities in both the Yoruba custom and the Islamic law in respect of the factors that precipitate inheritance. Yet, their differences bordered on the varied legal sources for the inheritance rules, determination of the estate, the composition and status of the beneficiaries, the bases of claim to inheritance, the principle of sharing and distribution of the estate. The paper ascertained that the Yoruba custom exploit the women in varying dimensions. Both the *idi-igi* and *ori o jori* traditions strive to benefit the children but apparently they are laden with injustice and inconsistency. Contrarily, the Islamic law prescribes specific sharing formulae which are characterized with equity and perpetuity. The Islamic legal dispensation was therefore virtually a revolution in the whole philosophy of estate distribution among the Yoruba Muslims in order to protect and guarantee the rights of the women. None-the-less, violations of the Islamic rules, misinterpretation of the Yoruba custom and confusion of the custom with the Islamic law provisions were aptly noted. Hence, the paper recommends as follows:

(i) The Yoruba Muslims should have a clear understanding of the provisions of the two systems so as to avoid confusion.

(ii) The Yoruba Muslims should be firm in the administration of the estate of a deceased relation in accordance with the Islamic law.

(iii) The Yoruba Muslims should distinguish between the Yoruba culture and the Islamic law in the administration of the estate and jettison cultural interference.

(iv) The Yoruba Muslims should employ the services of the *Shari'ah* juridical courts or Islamic scholars (*'ulama'*) who are versed in the inheritance law for the inheritance process.

(v) The patrons of the Yoruba customary system should abide by the Qur'anic injunction that compels absolute adherence to the Islamic faith and practices (Q. 2: 208).

(vi) Advocates of women right in the contemporary age among the Yoruba Muslims should be properly guided by the provisions of Islamic law on such rights in order to avoid transgression in the course of their agitations.

Endnotes

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43. As-Sayyid Sabiq, *Fiqh 'us–Sunnah* III, (Beirut: Dar al – Fikr, 1412 AH / 1992 CE),428 – 429. See also Maulana Fazlul-Karim, *Al –Hadis (An English Translation and Commentary of Mishkat-ul Masabih)* II (Lahore: Malik Sirajuddin and Sons, 1979), 331.
44. Abdus-Sami'i Imam Arikewuyo, "The Rights of a Woman to Acquisition, Ownership and Disposal of Property: The *Sharicah* Perspective" (Ph.D Thesis, University of Ilorin, 2003), 188. See also N. J. Coulson, *Succession in the Muslim Family*, (Cambridge: The University Press, 1971), 40.
45. Sabiq, *Fiqh 'us–Sunnah*, 425-426.
46. Ambali, *The Practice of Muslim Family Law in Nigeria*, 284.
47. Arikewuyo, "The Rights of a Woman to Acquisition, Ownership and Disposal of Property …", 212.
48. Mallam AbdulKadri Woli Salman, Teacher, Government Day Secondary School, Alore, Ilorin. Interviewed on 31st May, 2016.
49. Ogunbowale, *Asa Ibile Yoruba*, 69.
50. *Bolaji & Ors v. Akapo & Ors* (1968) 1 NMLR 203 at 206.
51. Muhammad, "Inheritance as it affects You", 10.
52. Alfa Sulayman Abioye Yusuf, 52, Aromolojo Quarters, Ogbomosho. Interviewed on 27th July, 2016.
53. For instance, see Robert Roberts, *The Social Laws of the Qoran* (New Delhi: Cosm Publications, 1978), 66.

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