

B E T W E E N:

MAHIM KHAN

APPLICANT

AND

ALKIVIADES DAVID

RESPONDENT

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UPDATED CORRESPONDENCE BUNDLE

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From: Ajay Fournillier  
Sent: 15 September 2025 14:42  
To: Alki David; 'alki@filmon.com'  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
2025.09.15 - Letter HK to Alki David (Application re alternative service).pdf; 2025.09.15 -  
Attachments: Application for alternative service by email.pdf; 2025.09.15 - Draft Order - Service Application.docx; Application Exhibit - 15.09.2025.pdf

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Dear Mr David

Please see attached letter and enclosures referred to therein.

Yours faithfully


**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

[Stay in touch](#) 

# HOWARD KENNEDY

Alkiviades David  
4 Wilton Place  
London  
SW1X 8RH

Our ref 061514.00004  
Doc ref 65877086.1

**By Email Only**

E: filmonpersonal@gmail.com and alki@filmon.com

Dear Sir

15 September 2025

**Mahim Khan v Alkiviades David**  
**Claim No. KB-2025-001991**

We enclose, by way of service upon you, our client's application for alternative service by email, which comprises the following documents:

1. Application Notice dated 15 September 2025;
2. Application Exhibit; and
3. Draft Order.

We confirm that the above documents have been filed with the court this afternoon by way of CE file and we will serve the sealed version of the application notice (item 1 above) when it becomes available.

In the meantime, you will note from the application notice that we have requested the court to list the application at the hearing of our client's Contempt Application listed in person on 9 October 2025.

We should be grateful if you would confirm receipt.

Yours faithfully



**Howard Kennedy LLP**



From: Alki David <filmonpersonal@gmail.com>  
Sent: 16 September 2025 00:19  
To: Ajay Fournillier; KB Judges Listing Office; Jenique Joseph; Morgan, June; benjamin.power@justice.gov.uk  
Cc: Rebecca Hume; Boniswa Dzere; legalaffairs@ab.gov.ag  
Subject: Re: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: SUMMARY JUDGEMENT - MOTION.pdf; Claim Form (6)-3.pdf; redstone.NY-1.pdf; Shari Redstone-1.pdf; Screenshot 2025-09-15 at 15-55-49 Claim Form (6)-3.pdf.png

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**Subject:** *KB-2025-001991 – Defendant’s Response to Claimant’s N244 (Application for Service by Email) – Attention Cotter J*

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Dear Registrar,

**Re: Khan v. David – Claim No: KB-2025-001991  
Application for Alternative Service by Email (N244 dated 15 September 2025)**

I write as Defendant, in person, and as Ambassador-at-Large & Sheriff-at-Large of Antigua & Barbuda. Kindly place before **Mr Justice Cotter** at the earliest opportunity.

I respectfully submit my **Response to the Claimant’s N244 application**, together with supporting exhibits, in a single PDF bundle entitled:

**“KB\_Response\_with\_Redstone\_Service\_and\_AntiguaClaim.pdf”**

This bundle contains:

1. **Response to N244**, setting out my position that I do not oppose service by email in principle but insist that all service must be to my official ambassadorial address [legal@swissx.com](mailto:legal@swissx.com), and that such service must be reciprocal.
2. **Claim Form – Antigua & Barbuda v. The Media Cartel (ANUHCV2025/0149)**, evidencing parallel proceedings where service on the same defendants has already been executed at considerable cost.
3. **Certificates of Service – Shari Redstone**, demonstrating that she was personally served in both London and New York by Kent Legal UK and its US partners, yet nonetheless defaulted while concluding her \$8.4 billion Skydance merger.

My filing also highlights:

- That I am a **disabled litigant**, and repeated abuse of my disability by the Claimant’s solicitors has culminated in a **physical assault witnessed by RCJ Officers 10 and 26**, plus two additional witnesses, all the subject of criminal complaints.
- That I am in **direct communication with the U.S. Department of Justice in Washington, D.C.**, and have commenced **KN filings in the U.S. District Court for Maryland** concerning the same misconduct.
- That related Antigua proceedings are listed before **Justice Rene Williams on 10 October 2025 at 9:00 AM**, with judgment to be issued, underscoring the international significance of these matters.

In the circumstances, it is both appropriate and necessary for this Court to direct that **only [legal@swissx.com](mailto:legal@swissx.com)** is valid for service, to ensure orderliness, consistency across jurisdictions, and protection against harassment.

I respectfully ask that this Response and Bundle be placed before **Cotter J** and recorded on CE-File as my formal answer to the Claimant's application.

Yours faithfully,

**Alkiviades David**

Defendant (Litigant in Person)

Ambassador-at-Large & Sheriff-at-Large of Antigua & Barbuda

15 September 2025

From: Alki David <filmonpersonal@gmail.com>  
Sent: 16 September 2025 01:21  
To: Ajay Fournillier; KB Judges Listing Office; Jenique Joseph; Morgan, June; benjamin.power@justice.gov.uk  
Cc: Rebecca Hume; Boniswa Dzere; legalaffairs@ab.gov.ag  
Subject: Re: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: SIN\_Exhibit\_A\_Filing\_AllInOne (1).pdf

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## Submission to Justice Cotter's Court (King's Bench, London)

**Subject:** Submission of Exhibit A – Media Arsenal Report (KB-2025-001991)

Dear Registrar,

Please accept for filing in the matter of *Antigua & Barbuda v. The Media Cartel* (Case No: KB-2025-001991, before Justice Cotter) the attached document entitled:

### **Affidavit of Alkiviades David with Exhibits A and A1**

This filing includes:

- **Exhibit A** – SwissX Island Network (SIN) Media Arsenal Report (15 September 2025).
- **Exhibit A1** – Instagram evidence of the “Daily Mail taxi debacle,” confirming mainstream and public notice.

The affidavit is signed electronically due to my disability, in compliance with accessibility and court rules.

Please confirm receipt and ensure this document is placed on the case file before the return date of **10 October 2025 at 9:00 AM**.

Yours sincerely,

**Alkiviades David**

Sheriff-at-Large, Antigua & Barbuda

legal@swissx.com

---

From: Ajay Fournillier  
Sent: 16 September 2025 15:01  
To: Alki David; 'alki@filmon.com'  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
2025.09.16 - Letter HK to Alki David (sealed Application Notice re alternative service).pdf;  
Attachments: sealed2025.09.15 - Application for alternative service by email.pdf; Application Exhibit - 15.09.2025.pdf; 2025.09.15 - Draft Order - Service Application.docx

---

Dear Mr David

Please see attached letter and enclosures referred to therein.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

[Stay in touch](#) 

# HOWARD KENNEDY

Alkiviades David  
4 Wilton Place  
London  
SW1X 8RH

Our ref 061514.00004  
Doc ref 65887811.1

**By Email Only**

E: filmonpersonal@gmail.com and alki@filmon.com

Dear Sir

16 September 2025

**Mahim Khan v Alkiviades David**  
**Claim No. KB-2025-001991**

We write further to our letter of yesterday.

The sealed Application Notice which we have received from the Court today is enclosed by way of service. For completeness, copies of the following documents provided to you yesterday are enclosed again:

1. Application Exhibit; and
2. Draft Order.

We should be grateful if you would confirm receipt.

Yours faithfully



**Howard Kennedy LLP**



From: Alki David <filmonpersonal@gmail.com>  
Sent: 17 September 2025 18:26  
To: Ajay Fournillier; KB Judges Listing Office; Morgan, June; benjamin.power@justice.gov.uk; Jenique Joseph; legalaffairs@ab.gov.ag; Jessica Green  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: Re: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]

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## Covering Email to Registrar

**Subject:** KB-2025-001991 — Defendant’s Skeleton Argument & Notice of Nominated Address for Service

Dear Registrar,

Please find copied herein, for filing in advance of the hearing listed on **9 October 2025**, the following documents on behalf of the Defendant, **Mr Alkiviades David**:

1. Skeleton Argument (updated to include submissions on substituted service, Default Judgment, proportionality, public interest via the SIN Network, and conduct of Claimant’s representative).
2. Notice of Nominated Address for Service (Email).

The Defendant respectfully draws the Court’s attention to:

- The **Default Judgment entered on 18 July 2025**, which is dispositive of liability.
- The disproportionate costs of physical service when the Claimant’s own evidence shows the Defendant has exchanged approx. 400 emails and attended hearings in person.
- The oppressive conduct of the Claimant’s representative, **Mr Ajay Fournillier of Howard Kennedy LLP**, who physically jostled the Defendant in court despite his disability.
- The fact that these proceedings are subject to ongoing scrutiny via the **SwissX Island Network (SIN Network)**, which reaches millions of viewers monthly, underscoring the importance of transparency.

These documents are verified and signed electronically by the Defendant, who is disabled and unable to provide a handwritten signature. They are submitted pursuant to **CPR 22** and **Practice Direction 5B (Electronic Filing)**, and with reference to the **Equal Treatment Bench Book** (reasonable adjustments).

Yours sincerely,  
Alkiviades David  
Defendant  
Email: [legal@swissx.com](mailto:legal@swissx.com)

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## Skeleton Argument

**BETWEEN:**

**Mahim Khan (Claimant)**

– and –

**Alkiviades David (aka Alki David) (Defendant)**

---

## **SKELETON ARGUMENT OF THE DEFENDANT**

For hearing on 9 October 2025

(Listed with Claimant's Contempt Application)

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### **A. INTRODUCTION**

1. This Skeleton Argument is filed and served on behalf of the Defendant, in advance of the hearing on 9 October 2025, listed together with the Claimant's N244 Application for substituted service by email.
  2. The Defendant opposes any attempt to characterise service as incomplete or defective, and seeks the Court's confirmation that service by email constitutes good service in these proceedings.
  3. The Defendant also invites the Court to recognise that a Default Judgment was entered on 18 July 2025, such that further costs and service disputes are both unnecessary and disproportionate.
- 

### **B. BACKGROUND**

4. By Order of Mr Justice Calver dated 26 June 2025 ("Receiver Order"), substituted service was permitted at three London addresses.
  5. The Claimant's own evidence confirms:
    - a. The Defendant's permanent residence is in Antigua.
    - b. The Defendant has actively communicated with Claimant's solicitors and the Court exclusively by email, sending approximately 400 emails between 1 July 2025 and 15 September 2025.
    - c. The Defendant attended the hearing of 25 July 2025 in person, travelling from Antigua.
    - d. In addition to the long-used address [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com), the Defendant formally nominates [legal@swissx.com](mailto:legal@swissx.com) as his designated address for service going forward.
  6. On 18 July 2025, a Default Judgment was entered against the Defendant.
- 

### **C. ISSUES**

7. The principal issues for determination at this hearing are:
  - (i) Whether substituted service by email should be confirmed as good service for all subsequent applications and orders;
  - (ii) Whether it is proportionate, under the Overriding Objective, for the Claimant to continue incurring £500+ per attempt on redundant physical service;
  - (iii) Whether the Default Judgment must now be treated as binding when considering any contempt application.

---

## D. SUBMISSIONS

8. **Service is established:** The Defendant's conduct demonstrates receipt and engagement. Claimant's solicitors have corresponded entirely by email, to which the Defendant has responded.
  9. **Default Judgment:** The entry of Default Judgment on 18 July 2025 is dispositive of liability.
  10. **Proportionality:** CPR 1.1 requires litigation to be conducted justly and at proportionate cost. Ongoing attempts to effect hand service at £500 each are wasteful where the Defendant is demonstrably accessible by email.
  11. **Contempt Proceedings:** It is an abuse of process to pursue contempt allegations while simultaneously contesting service, when service is plainly established and a Default Judgment already exists.
- 

## E. RELIEF SOUGHT

12. The Defendant respectfully seeks the following orders:
    - a. A declaration that, for all purposes in these proceedings, service by email to [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com) or [legal@swissx.com](mailto:legal@swissx.com) constitutes good service.
    - b. A direction that Claimant's solicitors cease attempts at physical service, with costs reserved.
    - c. Recognition that the Default Judgment entered on 18 July 2025 is binding, such that contempt allegations must be considered in that context.
- 

## F. AUTHORITIES

13. The Defendant will rely on:
    - CPR Part 6 (Service of Documents)
    - CPR Part 1 (Overriding Objective)
    - *Abela v Baadarani* [2013] UKSC 44
- 

## G. PUBLIC INTEREST AND TRANSPARENCY

14. The Defendant draws the Court's attention to the **SwissX Island Network** ("SIN Network"), which broadcasts investigative reporting and updates to millions of viewers monthly across Shockya, TVMix, FilmOn, SwissXTV and affiliates.
  15. The proceedings are therefore under substantial public scrutiny, emphasising the need for proportionality and transparency in the Court's orders.
  16. This weighs strongly in favour of confirming email service as good service and recognising the binding effect of the Default Judgment.
- 

## H. CONDUCT OF CLAIMANT'S REPRESENTATIVE

17. The Defendant places on record the farcical and oppressive conduct of **Mr Ajay Fournillier of Howard Kennedy LLP**, who physically jostled the Defendant in court despite the Defendant's disabilities.
18. His constant aggressive presence exacerbates the Defendant's vulnerability, contrary to the Equal Treatment Bench Book.
19. The Defendant submits that this undermines fairness and constitutes an abuse of process.

---

**Dated: 17 September 2025**

**Signed electronically:** \_\_\_\_\_

**Alkiviades David (Defendant)**

**E-Sign: Disabled party – unable to provide handwritten signature**

**This document is verified by me personally in accordance with CPR 22 and Practice Direction 5B (Electronic Filing).**

**Pursuant to the Equal Treatment Bench Book, reasonable adjustments are requested and this e-signature shall be treated as valid for all purposes.**

**Email: [legal@swissx.com](mailto:legal@swissx.com)**

---

## **Notice of Nominated Address for Service (Copy-Paste)**

**IN THE HIGH COURT OF JUSTICE**

King's Bench Division — Claim No: KB-2025-001991

**Mahim Khan (Claimant)**

— and —

**Alkiviades David (Defendant)**

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## **NOTICE OF NOMINATED ADDRESS FOR SERVICE (EMAIL)**

1. The Defendant hereby nominates the following email addresses for service of any and all documents in these proceedings, including applications, orders, hearing notices and correspondence:
  - [legal@swissx.com](mailto:legal@swissx.com) (primary, designated legal inbox)
  - [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com) (secondary, actively monitored)
2. This ensures efficiency and avoids unnecessary expense under CPR Part 1.
3. The Defendant invites the Court to confirm under CPR 6.15/6.27 that service to either email address is good service.

**Note on Public Scrutiny:** Proceedings are under active coverage by the **SwissX Island Network (Shockya, TVMix, FilmOn, SwissXTV, etc.)** with millions of monthly viewers. This reinforces the importance of clarity and transparency in the Court's orders.

---

**Dated: 17 September 2025**

**Signed electronically: \_\_\_\_\_**

**Alkiviades David (Defendant)**

**E-Sign: Disabled party – unable to provide handwritten signature**

**This document is verified by me personally in accordance with CPR 22 and Practice Direction 5B (Electronic Filing).**

**Pursuant to the Equal Treatment Bench Book, reasonable adjustments are requested and this e-signature shall be treated as valid for all purposes.**

**Email: [legal@swissx.com](mailto:legal@swissx.com)**

---

From: Ajay Fournillier  
Sent: 01 October 2025 12:48  
To: 'alki@filmon.com'; Alki David; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
2025.10.01 - Letter HK to Alki David (Affidavit AF3 and exhibit).pdf; 2025.09.30 - Third  
Attachments: Affidavit - Ajay Fournillier (sworn)(66015797.1).pdf; 2025.09.30 – Exhibit AF3 [final]  
(sworn).pdf

---

Dear Sir

Please see attached letter and enclosures referred to therein.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

[Stay in touch](#) 

# HOWARD KENNEDY

Alkiviades David  
4 Wilton Place  
London  
SW1X 8RH

Our ref 061514.00004  
Doc ref 66022432.1

**By Email Only**

E: filmonpersonal@gmail.com; alki@filmon.com and  
legal@swissx.com

Dear Sir

1 October 2025

**Mahim Khan v Alkiviades David**  
**Claim No. KB-2025-001991**

We refer to the hearing of our client's Contempt Application and Alternative Service Application listed for hearing on 9 October 2025.

We enclose, by way of service, the following documents filed with the Court today in support of the above applications:

1. Third Affidavit of Ajay Fournillier sworn on 30 September 2025; and
2. Exhibit AF3 to the above Affidavit.

We should be grateful if you would confirm receipt.

Yours faithfully



**Howard Kennedy LLP**




From: Ajay Fournillier  
Sent: 01 October 2025 13:32  
To: filmonpersonal@gmail.com; alki@filmon.com; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004

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File(s):

- 2025.09.30 – Exhibit AF3 [final] (sworn).pdf
- 2025.09.30 - Third Affidavit - Ajay Fournillier (sworn)(66015797.1).pdf
- 2025.10.01 - Letter HK to Alki David (Affidavit AF3 and exhibit).pdf

Dear Sir

We are re-serving the documents served by email today at 12:48 hours having received a bounce back from your email address [legal@swissx.com](mailto:legal@swissx.com).

For convenience, the enclosures to our email referred to above are now attached by way of Mimecast. You will receive a link with this email giving you access to download the documents.

We will let you know if we receive a further bounce back from the email address [legal@swissx.com](mailto:legal@swissx.com), being one of the email addresses which you nominated for service in your email to the court dated 17 September 2025 timed at 18:26.

Yours faithfully  
**Howard Kennedy LLP**

**Ajay Fournillier**  
Associate | Howard Kennedy LLP  
t: +44 (0)20 3755 5639  
[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)  
[Stay in touch](#)



From: Ajay Fournillier  
Sent: 06 October 2025 12:17  
To: filmonpersonal@gmail.com; alki@filmon.com; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - Hearing bundles - hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004

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File(s):

- Core bundle - KB-2025-001991 - Hearing on 09.10.2025.pdf
- Exhibit bundle - KB-2025-001991 - hearing on 09.10.25.pdf

Dear Mr David

We refer to the hearing of our client's Contempt Application listed in person this Thursday, 9 October 2025.

We confirm that the hearing of our clients Alternative Service application dated 15 September 2025 is listed at the same hearing.

In advance of the hearing, we enclose, by way of service, the hearing bundles which comprise the following:

1. Core Bundle; and
2. Exhibit Bundle.

The bundles referred to above are attached by way of Mimecast and you should receive a link with this email giving you access to download the bundles. Please do let us know if you have any issues accessing the bundles.

Lastly, as you are aware, the hearing is listed for half a day but the time of the hearing will not be confirmed until the day before the hearing at around 2pm. We will notify you around that time as to the start time of the hearing.

In the meantime, we should be grateful if you would confirm receipt of the hearing bundles and confirm whether you will be attending the hearing, as to which your attendance is required in person.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

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From: Ajay Fournillier <Ajay.Fournillier@howardkennedy.com>  
Sent: 08 October 2025 10:00  
To: Alki David; 'alki@filmon.com'; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - N260 - Hearing on 09/10/2025 - KB-2025-001991 - Mahim Khan v Alkiviades David  
- our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: 2025.10.08 - KB-2025-001991 - Applicant's N260 - Contempt App and Alternative Service App  
(hearing 09.10.25).pdf

---

Dear Mr David

We enclose, by way of service, the Claimant's Statement of Costs (N260) in respect of the hearing listed tomorrow, 9 October 2025, of which a copy has been filed with the Court via CE File.

Please confirm receipt.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

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From: Ajay Fournillier  
Sent: 08 October 2025 12:46  
To: alki@filmon.com; Alki David; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: Hearing on 09/10/2025 - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: Claimant's Skeleton Argument - Hearing on 09.10.25 [filed 08.10.25].pdf

---

Dear Mr David

We enclose a copy of the Claimant's Skeleton Argument filed with the court today in connection with tomorrow's hearing.

Please confirm receipt.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

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From: Alki David <filmonpersonal@gmail.com>  
Sent: 08 October 2025 13:29  
To: Ajay Fournillier; Morgan, June Judge Cotter; benjamin.power@justice.gov.uk  
Cc: legal@swissx.com; Rebecca Hume; Boniswa Dzere  
Subject: Re: Hearing on 09/10/2025 - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]

---

# H.E. ALKIVIADES DAVID

AMBASSADOR-AT-LARGE FOR THE GREEN ECONOMY (ANTIGUA & BARBUDA)  
IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
Claim No: KB-2025-001991

---

**Between:**

MAHIM KHAN – *Claimant / Applicant*

and

ALKIVIADES DAVID (also known as ALKI DAVID) – *Defendant / Respondent*

---

## SKELETON ARGUMENT ON BEHALF OF THE RESPONDENT

**Filed by:** H.E. Alkiviades David

*Ambassador-at-Large for the Green Economy, Government of Antigua & Barbuda*  
*Recognised Whistle-blower and Severely Disabled Person*

**Date:** 8 October 2025      **Hearing:** 9 October 2025

---

### 1 Introduction

- 1.1 This Skeleton Argument responds to the Applicant's Skeleton dated 8 October 2025.
  - 1.2 The Respondent is a recognised diplomat and whistle-blower.
  - 1.3 The present contempt proceedings are retaliatory and constitute an abuse of process.
- 

### 2 Diplomatic and Whistle-blower Status

- 2.1 Letters of credence confirm the Respondent's appointment as *Ambassador-at-Large for the Green Economy* for the Government of Antigua & Barbuda.
  - 2.2 He is protected under the **Public Interest Disclosure Act 1998**, **Article 10 ECHR**, and **Articles 29–31 Vienna Convention on Diplomatic Relations (1961)**.
- 

### 3 Background and Abuse of Process

- 3.1 The contempt allegations arise from historic freezing orders issued when the Respondent had no active UK accounts beyond a disclosed Revolut balance (£54 470).
  - 3.2 HSBC and Barclays confirmed closures years earlier.
  - 3.3 The proceedings have been weaponised to inflict reputational and economic harm.
- 

## 4 Service and Proof

- 4.1 Proof of service of this Skeleton and exhibits will be filed with the Court and served on Howard Kennedy LLP under CPR 6.44.
  - 4.2 Service is by email; a Certificate of Service will follow.
  - 4.3 The Respondent acts in good faith.
- 

## 5 Disputed Personal Service and Conduct

- 5.1 The alleged personal service of 25 July 2025 was an unsafe encounter; the bundle was not accepted.
  - 5.2 Reliance on that incident is defective under CPR 81.5 (1).
  - 5.3 The Applicant's solicitors have mischaracterised events and caused harassment.
- 

## 6 Disability and Equality Rights

- 6.1 The Respondent is a **severely disabled person** within the meaning of the **Equality Act 2010**.
  - 6.2 Proceeding without reasonable accommodations breaches Sections 15 and 20 of that Act and Articles 6 and 14 ECHR.
  - 6.3 Requested adjustments include: remote attendance, electronic service, extended response time, and recognition of medical limitations.
  - 6.4 Any order made without such adjustments would be unlawful and discriminatory.
- 

## 6A Background: The Alpha Nero Yacht Proceedings

- 6A.1 Many related disputes arose from the **Alpha Nero super-yacht**, formerly moored in Antigua & Barbuda and sold with U.S. Treasury approval.
  - 6A.2 Ownership litigation sparked connected filings in the Eastern Caribbean and elsewhere.
  - 6A.3 These proceedings followed soon after, forming part of that sequence.
  - 6A.4 The Respondent's inclusion as a party stemmed from malicious efforts to damage his relationships and standing in Antigua.
  - 6A.5 A **U.S. Federal Court** has since **reversed and disposed of the Alpha Nero proceedings**, closing that matter and clarifying jurisdiction for the Antiguan authorities.
- 

## 7 Parallel Proceedings

- 7.1 Related proceedings are before the **Eastern Caribbean Supreme Court (ANUHCV 2025/0149)**, listed for judgment on **10 October 2025** before Justice René Williams.
- 7.2 The case, now entitled *The Government of Antigua & Barbuda v The Hollywood Media Cartel*, includes additional defendants linked to these issues.
- 7.3 Damages claims now extend to **hundreds of billions of U.S. dollars** in climate-related and economic losses (under that Court's jurisdiction).

- 7.4 Several defendants have defaulted.  
7.5 This Court is asked to note these facts only for context and comity.
- 

## 7A Public-Interest Media Materials

7A.1 Significant media coverage has arisen on [Shockya.com](https://www.shockya.com), including:

- (a) “*Rovier Carrington – The Star Witness at International Human Rights Court That Exposes Hollywood’s Hidden Pedophile Ring*” (5 Oct 2025);  
(b) “*Exclusive Video: Family Guy Brian Graden Raped Me When I Was 17 – Abused for Years Then Jailed Me When I Spoke Up*” (3 Oct 2025);  
(c) “*Curt Weldon’s Return: Why Shari Redstone and the Cartel Should Be Afraid*” (17 Sep 2025).

7A.2 These publications have been **filed as exhibits** in the Antigua proceedings and referenced in **Maryland U.S.A. RICO filings** involving former Congressman Curt Weldon.

7A.3 The Respondent relies on them solely to illustrate public interest and international scope, not for the truth of any allegations.

7A.4 Their existence underscores the need for consistency and comity between this Court and foreign jurisdictions.

---

## 8 Prospective Reliance on Foreign Judgment

8.1 If the Eastern Caribbean Court issues a monetary judgment, the Respondent intends to seek registration in England under **CPR Part 74** and the **Administration of Justice Act 1920**.

8.2 Certified copies will be lodged once available.

---

## 9 Relief Sought

The Respondent respectfully asks that the Court:

1. Dismiss the Contempt Application as vexatious;
  2. Lift or vary the Freezing Orders to permit living and legal expenses;
  3. Refer the Applicant’s solicitors to the SRA for review of professional conduct;
  4. Record the Respondent’s diplomatic, whistle-blower, and disability status; and
  5. Ensure reasonable adjustments for future hearings.
- 

## 10 Conclusion

10.1 The Respondent has acted transparently and co-operatively.

10.2 The allegations of contempt are unfounded and retaliatory.

10.3 The Court is invited to exercise its discretion to uphold fairness, equality, and proportionality.

10.4 **Pattern of Systemic Legal Abuse** – The Respondent’s experience reflects a wider pattern of “lawfare” and co-ordinated legal abuse within the entertainment industry, where litigation and media influence have been used to silence whistle-blowers and victims. The Respondent urges the Court to remain vigilant that justice serve its public-interest purpose and not become an instrument of intimidation.

---

**Respectfully submitted,**  
**H.E. Alkiviades David**  
Ambassador-at-Large for the Green Economy  
Government of Antigua & Barbuda

**Signed (pursuant to CPR PD 5B):** *H.E. Alkiviades David*  
(*Electronic filing – signature not required by hand*)

**Date:** 8 October 2025

On Wed, Oct 8, 2025 at 4:46 AM Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)> wrote:


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Please confirm receipt.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**  
Associate | Howard Kennedy LLP  
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[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)  
**[Stay in touch](#)** 

No.1 London Bridge London SE1 9BG  
[www.howardkennedy.com](http://www.howardkennedy.com)

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Howard Kennedy/Howard Kennedy Corporate Services LLP will not change bank details during the course of this matter. If during the course of this matter you receive an email or telephone call purporting to be from us informing you that our bank details have changed, it is likely to be an attempted fraud. Please contact us by telephone to inform us of any such communication.

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From: Ajay Fournillier  
Sent: 08 October 2025 15:32  
To: Alki David; alki@filmon.com; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

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We write to confirm that the hearing tomorrow will take place at the Royal Courts of Justice in Court 21 at 10:30am before Mrs Justice Stacey.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkenedy.com

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Sent: 08 October 2025 16:07  
To: Ajay Fournillier; benjamin.power@justice.gov.uk; Morgan, June Judge Cotter; KB Judges Listing Office  
Cc: legal@swissx.com; Rebecca Hume; Boniswa Dzere; legalaffairs@ab.gov.ag  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]  
Attachments: CONSOLIDATE MOTION.pdf

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# IN THE HIGH COURT OF JUSTICE

## KING'S BENCH DIVISION

**Claim No.: KB-2025-001991**  
**Royal Courts of Justice – Court 21**  
**Listed:** Thursday 9 October 2025 at 10:30 a.m.  
**Before:** The Honourable Mrs Justice Stacey

---

### BETWEEN

**H.E. ALKIVIADES DAVID** *Claimant / Applicant*  
— and —  
**[Defendants / Respondents]**

---

## URGENT NOTICE OF AMBUSH AND APPLICATION TO VACATE / ADJOURN HEARING

*(With reference to the Orders of Cotter J dated 25 July 2025 and subsequent confirmation through Judicial Clerk June Morgan – Special Master Direction)*

---

### A. RELIEF SOUGHT (IMMEDIATE)

1. That the hearing listed for **9 October 2025 at 10:30 a.m.** before **Mrs Justice Stacey** be **vacated** (or, in the alternative, **adjourned**) pending further order.
2. That no further listing occur until **Justice Cotter J's** directions of 25 July 2025 and his confirmation via **June Morgan** are formally varied or discharged.
3. That the Court give such further directions as are necessary to ensure equality of arms and compliance with the **Equality Act 2010**.

4. Costs reserved.
- 

## B. GROUNDS

5. **No notice / procedural ambush:** No Form N24 or valid notice under **CPR Part 23** has been served. The only communication was an email from **Howard Kennedy LLP** at 07:32 (UK time) on 8 October 2025 – less than 24 hours before the listing.
  6. **Live stay / supervision by Cotter J:** Proceedings remain subject to the Order of Justice Cotter J, who retains supervisory jurisdiction as **Special Master**. This status was reconfirmed through communications between His Lordship and Judicial Clerk **June Morgan**.
  7. **Conflict and contamination: Howard Kennedy LLP** are named and served in related global RICO and human-rights proceedings. Their participation here creates a direct conflict of interest and risks abuse of process.
  8. **Prejudice and fairness:** Proceeding tomorrow would violate the Claimant's disability accommodations and breach the overriding objective (CPR 1.1) and **Equality Act 2010** ss. 20–21.
    - 8A. **Fabricated or unreliable evidence:** Any evidence the Defendants or their solicitors might purport to rely upon in support of this without-notice listing is falsified or materially misleading, consistent with prior infractions already recorded before Cotter J. No verified or properly authenticated evidence has been served.
- 

## C. FACTUAL BACKGROUND

9. On 25 July 2025 Justice Cotter J formally acknowledged the Claimant as a **disabled litigant** and ordered reasonable adjustments including seven days' notice for any hearing and remote participation if needed.
  10. His Lordship subsequently **reaffirmed those directions through Judicial Clerk June Morgan**, confirming his status as **Special Master** supervising all applications and protective orders.
  11. The Defendants' solicitors ignored those orders by arranging an unnotified listing for 9 October 2025 before a different Bench.
  12. This constitutes a **procedural ambush** and **breach of Judicial Order**, placing Mrs Justice Stacey's Bench in potential conflict with a co-ordinate Order of the same Division.
    - 13D. **Pattern of falsification and procedural abuse:** Where the Defendants' solicitors have previously submitted exhibits or statements, those have been shown to contain forged signatures, altered timestamps, and fabricated correspondence, as recorded before Cotter J. Any material now relied upon to justify this hearing forms part of that continuing pattern and cannot lawfully ground a without-notice listing.
- 

## D. LAW AND AUTHORITIES (ABRIDGED)

- **CPR 1 & 3:** Overriding objective and case-management powers require fairness and accessibility for disabled litigants.
- **PD 23A §2.1 & 2.3:** Applications must be on notice unless properly without-notice and supported by evidence — none exists.
- **Equality Act 2010 ss. 20–21:** Failure to make reasonable adjustments for a disabled person is unlawful.
- **Cotter J's Orders:** remain binding until varied or discharged.

---

## E. ORDERS SOUGHT (DRAFT)

- A. The hearing listed for 9 October 2025 at 10:30 a.m. before Mrs Justice Stacey be **vacated / adjourned**.
  - B. No further hearing shall be listed until Cotter J's directions (25 July 2025 and confirmation through June Morgan) are varied or discharged.
  - C. Any future application must be made on seven days' clear notice with reasonable adjustments in place.
  - D. Costs reserved.
- 

## F. HARDSHIP AND ABUSE OF PROCESS

- 14. The Applicant appears **pro se** and resides presently in **Antigua and Barbuda**.
  - 15. The Defendants and their solicitors are fully aware that the Applicant has **no financial means**, lives on temporary assistance from friends, and cannot travel to London or retain representation at short notice.
  - 16. By securing a hearing without notice, while knowing of these circumstances and after having been **formally served today**, the Defendants are **deliberately exploiting the Applicant's disability, geographical location, and financial hardship**.
  - 17. This conduct offends the **overriding objective** and constitutes **an abuse of process**, designed to obtain a tactical advantage against an unrepresented disabled litigant who cannot physically attend or instruct counsel.
- 

## G. STATEMENT OF TRUTH AND DIGITAL SIGNATURE

I believe that the facts stated in this Notice and Application are true.

This document is **digitally signed** in accordance with the Civil Procedure Rules and the Court's Practice Direction on electronic filings.

The Applicant is a **registered disabled litigant**, status formally recognised by **Mr Justice Cotter J** on 25 July 2025 and subsequently reaffirmed through communications with Judicial Clerk **June Morgan**, and entitled to reasonable adjustments under the **Equality Act 2010**.

**Digitally Signed / s/ H.E. ALKIVIADES DAVID**

*Ambassador-at-Large for the Green Economy (Antigua & Barbuda)*

*Founder & CEO – Anakando Ltd.*

Date: 8 October 2025

---

### **Applicant**

H.E. Alkiviades David

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

Email [insert] Tel [insert] Address for service [insert]

### **Respondents' Solicitors**

Howard Kennedy LLP | No. 1 London Bridge | London SE1 9BG

FAO: Ajay Fournillier [ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

---

On Wed, Oct 8, 2025 at 7:32 AM Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)> wrote:

Dear Mr David

We write to confirm that the hearing tomorrow will take place at the Royal Courts of Justice in Court 21 at 10:30am before Mrs Justice Stacey.

Yours faithfully

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**Ajay Fournillier**

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To: Morgan, June  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; legal@swissx.com; Rebecca Hume; Boniswa Dzere; legalaffairs@ab.gov.ag  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

---

You are named June. Read it it first.

Please be more respectful.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

Alki David  
Founder & CEO Anakando Ltd.

Anakando Media Group <http://www.ANAKANDO.com>

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On Wed, Oct 8, 2025 at 8:13 AM Morgan, June <[june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)> wrote:

Dear Mr David

Thank you for your email but as with previous emails, the last one dated 29/08/2025 08:55, please remove my name from your circulation list. Mr Justice Cotter is not sitting in KB until after the Mid/end of November 2025. He is not sitting on tomorrow's hearing.

Regards

**June Morgan**

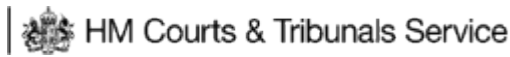
**Clerk to the Hon. Mr Justice Cotteri**

**A Presiding Judge of the North Eastern Circuit**

Landline: 020 7947 6458 Mobile: 07817069959

Email address: [june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)

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**From:** Alki David <[filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com)>

**Sent:** 08 October 2025 16:07

**To:** Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)>; Power, Benjamin | He/His <[Benjamin.Power@justice.gov.uk](mailto:Benjamin.Power@justice.gov.uk)>; Morgan, June <[june.morgan2@Justice.gov.uk](mailto:june.morgan2@Justice.gov.uk)>; KB Judges Listing Office <[KBJudgesListingOffice@Justice.gov.uk](mailto:KBJudgesListingOffice@Justice.gov.uk)>

**Cc:** [legal@swissx.com](mailto:legal@swissx.com); Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)>; Boniswa Dzere <[Boniswa.Dzere@howardkennedy.com](mailto:Boniswa.Dzere@howardkennedy.com)>; [legallaffairs@ab.gov.ag](mailto:legallaffairs@ab.gov.ag)

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

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**Claim No.:** KB-2025-001991

**Royal Courts of Justice – Court 21**

**Listed:** Thursday 9 October 2025 at 10:30 a.m.

**Before:** The Honourable Mrs Justice Stacey

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**BETWEEN**

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*(With reference to the Orders of Cotter J dated 25 July 2025 and subsequent confirmation through Judicial Clerk June Morgan – Special Master Direction)*

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**Digitally Signed / s/ H.E. ALKIVIADES DAVID**

*Ambassador-at-Large for the Green Economy (Antigua & Barbuda)*

*Founder & CEO – Anakando Ltd.*

Date: 8 October 2025

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**Applicant**

H.E. Alkiviades David

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

Email [insert] Tel [insert] Address for service [insert]

**Respondents' Solicitors**

Howard Kennedy LLP | No. 1 London Bridge | London SE1 9BG

FAO: Ajay Fournillier [ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

---

On Wed, Oct 8, 2025 at 7:32 AM Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)> wrote:

Dear Mr David

We write to confirm that the hearing tomorrow will take place at the Royal Courts of Justice in Court 21 at 10:30am before Mrs Justice Stacey.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

**Stay in touch**

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From: Alki David <filmonpersonal@gmail.com>

Sent: 08 October 2025 16:25

To: Morgan, June

Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; legal@swissx.com; Rebecca Hume; Boniswa Dzere; legalaffairs@ab.gov.ag; chiefclerk.kb@justice.gov.uk;  
Cc: KBRegistry@justice.gov.uk; enquiries@judicialconduct.gov.uk;  
seniorpresidingjudgeoffice@judiciary.uk; june.morgan@justice.gov.uk

Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

---

**To:KB**

Urgent – Enforcement of Cotter J. Special-Master Direction and Breach of Listing Protocol (KB-2025-001991)

---

Dear Listing Office,

Please find below my **Notice of Breach of Special-Master Direction and Request for Judicial Review of Listing Irregularity**.

This communication concerns the apparent disregard of the continuing supervisory order of **Mr Justice Cotter J** (25 July 2025), confirmed through his clerk **Ms June Morgan**, who expressly indicated that His Lordship wished to be “kept in the loop” regarding all future hearings and applications.

The listing for **9 October 2025** before **Mrs Justice Stacey** has occurred *without notice, without service of Form N24, and contrary to that direction*.

I respectfully request urgent administrative review and confirmation that the hearing will be vacated or stayed until Cotter J has reviewed the matter.

Thank you for your immediate attention.

---

## **IN THE HIGH COURT OF JUSTICE**

### **KING’S BENCH DIVISION**

**Claim No.: KB-2025-001991**

**Royal Courts of Justice, London**

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## **NOTICE OF BREACH OF SPECIAL-MASTER DIRECTION AND REQUEST FOR JUDICIAL REVIEW OF LISTING IRREGULARITY**

### **1 | Standing Judicial Direction**

On **25 July 2025**, the Honourable Mr Justice Cotter J recognised the Applicant, **H.E. Alkiviades David**, as a disabled litigant and granted *reasonable adjustments* under the **Equality Act 2010 ss. 20–21**.

That order appointed Cotter J as *Special Master* retaining *supervisory jurisdiction* over all further applications and listings.

Subsequent correspondence from **Ms June Morgan** confirmed that *Mr Justice Cotter* requested to be “kept in the loop” regarding any future hearings or listings.

---

## 2 | Irregular Listing Before Mrs Justice Stacey

A hearing was listed for **9 October 2025 (10:30 a.m., Court 21)** before Mrs Justice Stacey without notice, service of Form N24, or Cotter J's prior approval.

This constitutes:

- A **procedural ambush** contrary to **CPR Part 23 and PD 23A §§ 2.1–2.3**;
- A **violation of extant judicial supervision** (Cotter J's order remains in force until varied or discharged); and
- A **failure to accommodate disability adjustments** required by the **Equality Act 2010** and **CPR 1.1 & 3.1**.

---

## 3 | Relief Requested

1. Vacate or stay the 9 October 2025 listing pending Cotter J's review.
2. Re-refer the case to Mr Justice Cotter J for confirmation of supervisory directions.
3. Request the Senior Presiding Judge to review the listing irregularity.
4. Ask the JCIO to record this notice as a potential breach of a standing order by court staff.

---

## 4 | Statement of Truth and Digital Signature

I believe that the facts stated in this Notice are true.

This Notice is digitally signed in accordance with the Civil Procedure Rules and the Practice Direction on electronic filings.

**Digitally Signed** / s/ *H.E. ALKIVIADES DAVID*

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

Date: 8 October 2025

Email: [insert] Tel: [insert]

---

From: Alki David <filmonpersonal@gmail.com>  
Sent: 08 October 2025 16:31  
To: Morgan, June  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; legal@swissx.com; Rebecca Hume; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

---

**Subject:** Accountability for Breach of Standing Judicial Direction – Cotter J Special-Master Order (KB-2025-001991)

---

Dear Ms Morgan,

It is with regret that I must record my serious concern regarding your conduct in the administration of proceedings **KB-2025-001991**.

As you are aware, **Mr Justice Cotter J** issued an order on **25 July 2025** confirming his **continuing supervisory jurisdiction** as *Special Master* and expressly directing, through you, that His Lordship be “**kept in the loop**” with respect to every subsequent listing or application. Despite this, a hearing has now been listed for **9 October 2025 before Mrs Justice Stacey**, without notice, without service of Form N24, and without Cotter J’s authorisation.

Your reply of 8 October 2025—which repeated the instruction to remove your name from circulation—ignores the standing order that you yourself conveyed. By failing to flag or halt this irregular listing, you have **enabled a procedural ambush against a disabled litigant**, in breach of:

- **CPR 1.1 and 3.1** (overriding objective and case-management fairness);
- **PD 23A §§ 2.1–2.3** (requirement of notice and evidence for applications); and
- **Equality Act 2010 ss. 20–21** (failure to make reasonable adjustments).

This conduct amounts to complicity in an **abuse of process** and places the integrity of the King’s Bench Division at risk. I therefore request that you:

1. **Acknowledge** this notice and confirm immediate referral of the issue to **Mr Justice Cotter J**;
2. **Notify the Listing Office** that no further steps should be taken until His Lordship has reviewed the matter; and
3. **Provide written confirmation** of your compliance for the record.

A copy of this email is being forwarded to the **Registrar, the Senior Presiding Judge, and the JCIO** for transparency and accountability.

Yours faithfully,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

From: Ajay Fournillier  
Sent: 08 October 2025 17:40  
To: alki@filmon.com; Alki David; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: RE: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]  
Hearing on 09\_10\_2025 - Contempt Application - KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) - our ref 061514.00004 [FSI-FSI.FID4981609].msg; Re Hearing on 09\_10\_2025 - Contempt Application - KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) - our ref 061514.00004 [FSI-FSI.FID4981609].msg; Re Hearing on 09\_10\_2025 - Contempt Application - KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) - our ref 061514.00004 [FSI-FSI.FID4981609].msg; AFFIDAVIT OF ALKIVIADES DAVID.msg; Urgent Listing – Contempt Application – KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) [FSI-FSI.FID4952873].msg; Urgent Listing - August 2025 – Contempt Application – KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) [FSI-FSI.FID4952873].msg

---

Dear Mr David

We refer to your email below and your subsequent emails timed at 16:25 and 16:31 UK time, which you sent to the Court with us in copy together with other recipients.

Your emails assert that you were not provided with notice of the hearing listed tomorrow (9 October 2025) and that the hearing has been listed absent authorisation from Mr Justice Cotter. As you will be aware, your assertions are entirely false (see below).

**Firstly**, this firm provided with notice of the hearing by email on 4 September 2025 at 11:49 UK time. The relevant email is attached (*see 1<sup>st</sup> attachment*). The hearing date of the Contempt Application is referred to in both the subject of the email and its contents. The same email also attached the email which we received from the court the same day confirming the listing of the hearing, which directed us to "*forward a copy of this listing notice to all interested parties*". Consequently, you did receive notice of the hearing, and on the same day on which this firm received notice of the hearing.

**Secondly**, upon receipt of notice of the hearing, you responded by sending three emails the same day, timed at 12:44, 19:52 and 20:11 UK time. Those three emails are attached by way of reminder (*see 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> attachment*). Each email expressly refers to the listing of the Contempt Application on 9 October 2025. For example, your first email timed at 12:44, which purports to be an affidavit states " *1. I am the Defendant in these proceedings and make this affidavit in response to the Claimant's contempt application listed for hearing on 9 October 2025*". [our underlining]

**Thirdly**, you are aware that pursuant to paragraph 1 of the (variation) Order of Mr Justice Cotter dated 25 July 2025 ("**Variation Order**"), the Judge directed the adjournment of the Contempt Application to a case management conference provided that you comply with sub-paragraphs (a) and (b) by the dates and times stipulated. In addition, pursuant to the further Order of Mr Justice Cotter dated 30 July 2025 ("**Further Order**"), at paragraph 1, the Judge directed "*1. There is no further order save that in the event that a hearing is required in this action (as opposed to any other action which is not the subject of the order in relation to case management) on an urgent basis and Mr Justice Cotter is not available the matter is released to another High Court Judge.*" [our underlining].

Accordingly, Mr Justice Cotter had already authorised releasing the matter to another High Court Judge in the event that a hearing was required on an urgent basis and he was not available. Since you failed to purge your contempt by the dates and times specified at paragraph 1 of the Variation Order, we wrote to the Court on 4 and 5 August 2025 requesting the urgent listing of the Contempt Application and for the matter to be released to another High Court Judge, in accordance with the direction made by Mr Justice Cotter. We attach copies of our correspondence with the KB Judges Listing Office on 4 and 5 August 2025 which you were copied to (*see 5<sup>th</sup> and 6<sup>th</sup> attachment*).

Yours faithfully

Howard Kennedy LLP

Ajay Fournillier

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

[Stay in touch](#) 

---

**From:** Alki David

**Sent:** Wednesday, October 8, 2025 4:07 PM

**To:** Ajay Fournillier ; benjamin.power@justice.gov.uk; Morgan, June Judge Cotter ; KB Judges Listing Office

**Cc:** legal@swissx.com; Rebecca Hume ; Boniswa Dzere ; legalaffairs@ab.gov.ag

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

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# IN THE HIGH COURT OF JUSTICE

## KING'S BENCH DIVISION

**Claim No.:** KB-2025-001991

**Royal Courts of Justice – Court 21**

**Listed:** Thursday 9 October 2025 at 10:30 a.m.

**Before:** The Honourable Mrs Justice Stacey

---

## BETWEEN

H.E. ALKIVIADES DAVID *Claimant / Applicant*

— and —

[Defendants / Respondents]

---

# URGENT NOTICE OF AMBUSH AND APPLICATION TO VACATE / ADJOURN HEARING

*(With reference to the Orders of Cotter J dated 25 July 2025 and subsequent confirmation through Judicial Clerk June Morgan – Special Master Direction)*

---

## A. RELIEF SOUGHT (IMMEDIATE)

1. That the hearing listed for **9 October 2025 at 10:30 a.m.** before **Mrs Justice Stacey** be **vacated** (or, in the alternative, **adjourned**) pending further order.
2. That no further listing occur until **Justice Cotter J's** directions of 25 July 2025 and his confirmation via **June Morgan** are formally varied or discharged.

3. That the Court give such further directions as are necessary to ensure equality of arms and compliance with the **Equality Act 2010**.
  4. Costs reserved.
- 

## B. GROUNDS

5. **No notice / procedural ambush:** No Form N24 or valid notice under **CPR Part 23** has been served. The only communication was an email from **Howard Kennedy LLP** at 07:32 (UK time) on 8 October 2025 – less than 24 hours before the listing.
  6. **Live stay / supervision by Cotter J:** Proceedings remain subject to the Order of Justice Cotter J, who retains supervisory jurisdiction as **Special Master**. This status was reconfirmed through communications between His Lordship and Judicial Clerk **June Morgan**.
  7. **Conflict and contamination:** **Howard Kennedy LLP** are named and served in related global RICO and human-rights proceedings. Their participation here creates a direct conflict of interest and risks abuse of process.
  8. **Prejudice and fairness:** Proceeding tomorrow would violate the Claimant's disability accommodations and breach the overriding objective (CPR 1.1) and **Equality Act 2010** ss. 20–21.
    - 8A. **Fabricated or unreliable evidence:** Any evidence the Defendants or their solicitors might purport to rely upon in support of this without-notice listing is falsified or materially misleading, consistent with prior infractions already recorded before Cotter J. No verified or properly authenticated evidence has been served.
- 

## C. FACTUAL BACKGROUND

9. On 25 July 2025 Justice Cotter J formally acknowledged the Claimant as a **disabled litigant** and ordered reasonable adjustments including seven days' notice for any hearing and remote participation if needed.
  10. His Lordship subsequently **reaffirmed those directions through Judicial Clerk June Morgan**, confirming his status as **Special Master** supervising all applications and protective orders.
  11. The Defendants' solicitors ignored those orders by arranging an unnotified listing for 9 October 2025 before a different Bench.
  12. This constitutes a **procedural ambush** and **breach of Judicial Order**, placing Mrs Justice Stacey's Bench in potential conflict with a co-ordinate Order of the same Division.
    - 13D. **Pattern of falsification and procedural abuse:** Where the Defendants' solicitors have previously submitted exhibits or statements, those have been shown to contain forged signatures, altered timestamps, and fabricated correspondence, as recorded before Cotter J. Any material now relied upon to justify this hearing forms part of that continuing pattern and cannot lawfully ground a without-notice listing.
- 

## D. LAW AND AUTHORITIES (ABRIDGED)

- **CPR 1 & 3:** Overriding objective and case-management powers require fairness and accessibility for disabled litigants.
  - **PD 23A §2.1 & 2.3:** Applications must be on notice unless properly without-notice and supported by evidence — none exists.
  - **Equality Act 2010 ss. 20–21:** Failure to make reasonable adjustments for a disabled person is unlawful.
  - **Cotter J's Orders:** remain binding until varied or discharged.
- 

## E. ORDERS SOUGHT (DRAFT)

- A. The hearing listed for 9 October 2025 at 10:30 a.m. before Mrs Justice Stacey be **vacated / adjourned**.
  - B. No further hearing shall be listed until Cotter J's directions (25 July 2025 and confirmation through June Morgan) are varied or discharged.
  - C. Any future application must be made on seven days' clear notice with reasonable adjustments in place.
  - D. Costs reserved.
- 

## F. HARDSHIP AND ABUSE OF PROCESS

- 14. The Applicant appears **pro se** and resides presently in **Antigua and Barbuda**.
  - 15. The Defendants and their solicitors are fully aware that the Applicant has **no financial means**, lives on temporary assistance from friends, and cannot travel to London or retain representation at short notice.
  - 16. By securing a hearing without notice, while knowing of these circumstances and after having been **formally served today**, the Defendants are **deliberately exploiting the Applicant's disability, geographical location, and financial hardship**.
  - 17. This conduct offends the **overriding objective** and constitutes **an abuse of process**, designed to obtain a tactical advantage against an unrepresented disabled litigant who cannot physically attend or instruct counsel.
- 

## G. STATEMENT OF TRUTH AND DIGITAL SIGNATURE

I believe that the facts stated in this Notice and Application are true.

This document is **digitally signed** in accordance with the Civil Procedure Rules and the Court's Practice Direction on electronic filings.

The Applicant is a **registered disabled litigant**, status formally recognised by **Mr Justice Cotter J** on 25 July 2025 and subsequently reaffirmed through communications with Judicial Clerk **June Morgan**, and entitled to reasonable adjustments under the **Equality Act 2010**.

**Digitally Signed / s/** H.E. ALKIVIADES DAVID

*Ambassador-at-Large for the Green Economy (Antigua & Barbuda)*

*Founder & CEO – Anakando Ltd.*

Date: 8 October 2025

---

### **Applicant**

H.E. Alkiviades David

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

Email [insert] Tel [insert] Address for service [insert]

### **Respondents' Solicitors**

Howard Kennedy LLP | No. 1 London Bridge | London SE1 9BG

FAO: Ajay Fournillier [ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

---

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Dear Mr David

We write to confirm that the hearing tomorrow will take place at the Royal Courts of Justice in Court 21 at 10:30am before Mrs Justice Stacey.

Yours faithfully  
**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

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---

From: Ajay Fournillier  
Sent: 04 August 2025 13:02  
To: KB Judges Listing Office  
Cc: 'alki@filmon.com'; Alki David; Rebecca Hume; Boniswa Dzere; Jessica Green  
Subject: Urgent Listing – Contempt Application – KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) [FSI-FSI.FID4952873]  
2025.08.04 - Letter to KBD (Listing - Contempt Application).pdf; Contempt Application 23.07.2025.zip; 2025.07.30 - KB-2025-001991 - Further Order - Mr Justice Cotter (REC 31.07.25).pdf; 2025.07.25 - KB-2025-001991 - Order (Receiver variation\_contempt\_stay) - Mr Justice Cotter (REC 31.07.2025).pdf

---

Dear KB Judges Listing Office

Please see attached letter and enclosures referred to therein.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

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**KB Judges Listing Office**

King's Bench Division  
Royal Courts of Justice  
Strand  
London  
WC2A 2LL

Our ref 061514.00004

Doc ref 65586891.2

By Email: [kbjudgeslistingoffice@justice.gov.uk](mailto:kbjudgeslistingoffice@justice.gov.uk)

Dear Court

4 August 2025

**Mahim Khan v Alkiviades David (also known as Alki David)**  
**KB-2025-001991**

We act for the Claimant, Mahim Khan, in the above proceedings.

We refer to the Claimant's Contempt Application dated and filed on 23 July 2025 ("**Contempt Application**") (copy enclosed). We also refer to the Orders of Mr Justice Cotter dated 25 July 2025 ("**Order**") and 30 July 2025 ("**Further Order**"), respectively. Copies of the Order and Further Order are enclosed for reference.

Pursuant to paragraph 1 of the Order, the Contempt Application is adjourned to the case management conference provided that the Respondent, Mr David, complies with paragraphs 1(a) and (b) of the Order by the time and dates stipulated, namely 4pm on 28 July 2025 and 4pm on 1 August 2025, respectively.

The Respondent has failed to comply with those directions in their entirety.

We therefore request that the Contempt Application be listed on an urgent basis on the first available date with a time estimate of ½ day. Please note the direction made at paragraph 1 of the Further Order which states:

*"1. There is no further order save that in the event that a hearing is required in this action (as opposed to any other action which is not the subject of the order in relation to case management) on an urgent basis and Mr Justice Cotter is not available the matter is released to another High Court Judge." [our underlining]*

Accordingly, the Contempt Application should be listed before Mr Justice Cotter to the extent he is available, but if not, the hearing of the Contempt Application should be released to another High Court Judge.



We confirm that the Respondent is copied to this correspondence.

We would be grateful if you could liaise with counsel's clerk Jessica Green at South Square (also copied) in the listing of the Contempt Application as a matter of urgency.

Yours faithfully



Howard Kennedy LLP

T: +44 (0)20 3755 5639

M: +44 (0)7384 259 689

[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

CC: Alkiviades David, the Respondent: [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com) and [alki@filmon.com](mailto:alki@filmon.com)  
Jessica Green: [jessicagreen@southsquare.com](mailto:jessicagreen@southsquare.com)

From: Ajay Fournillier  
Sent: 05 August 2025 11:47  
To: KB Judges Listing Office  
Cc: 'alki@filmon.com'; Alki David; Rebecca Hume; Boniswa Dzere; Jessica Green  
Subject: Urgent Listing - August 2025 – Contempt Application – KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) [FSI-FSI.FID4952873]  
Attachments: 2025.08.05 - Letter to KBD (Listing - Contempt Application).pdf; 2025.07.25 - KB-2025-001991 - Sealed Freezing Order - Mr Justice Cotter (REC 31.07.2025).pdf; Urgent Listing – Contempt Application – KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) [FSI-FSI.FID4952873].msg

---

Dear KB Judges Listing Office

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Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

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Our ref 061514.00004

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By Email: [kbjudgeslistingoffice@justice.gov.uk](mailto:kbjudgeslistingoffice@justice.gov.uk)

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4 August 2025

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**KB-2025-001991**

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T: +44 (0)20 3755 5639

M: +44 (0)7384 259 689

[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

CC: Alkiviades David, the Respondent: [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com) and [alki@filmon.com](mailto:alki@filmon.com)  
Jessica Green: [jessicagreen@southsquare.com](mailto:jessicagreen@southsquare.com)

**KB Judges Listing Office**

King's Bench Division  
Royal Courts of Justice  
Strand  
London  
WC2A 2LL

Our ref 061514.00004

Doc ref 65593926.2

By Email: [kbjudgeslistingoffice@justice.gov.uk](mailto:kbjudgeslistingoffice@justice.gov.uk)

Dear Court

5 August 2025

**Mahim Khan v Alkiviades David (also known as Alki David)**  
**KB-2025-001991**

We act for the Claimant, Mahim Khan, in the above proceedings.

This letter is intended to supplement our letter of yesterday requesting the listing of the Claimant's Contempt Application dated and filed on 23 July 2025 ("**4 August Letter**"). A copy of our letter which encloses the Contempt Application is enclosed.

**Listing request**

In accordance with paragraph 9.13 of the King's Bench Division Guide and paragraph 2.3(3) of Practice Direction 2F, we kindly request that the Claimant's Contempt Application be referred to a High Court Judge and marked 'fit for August' so that the Contempt Application may be heard in August 2025. The reasons for the request are explained further below by reference to the background and the current position.

**Background**

By way of background, the Contempt Application relates to the Defendant's breaches of paragraphs 9 and 10 of the Order of Mr Justice Calver dated 26 June 2025 and the continuation Order of Mr Justice Freedman dated 4 July 2025 ("**Freezing Orders**"). Copies of the Freezing Orders are enclosed with the Contempt Application.

Subsequently at the return date hearing on 25 July 2025 Mr Justice Cotter made orders in relation to:

- (i) The continuation of the Freezing Orders ("**25 July Freezing Order**"); and



- (ii) The Contempt Application being adjourned to case management conference provided that the Respondent, Alkiviades David, complied with (a) paragraph 9 of the Freezing Orders by no later than 4pm on 28 July 2025 and (b) paragraph 10<sup>1</sup> of the Freezing Orders by no later than 4pm on 1 August 2025 ("**25 July Variation Order**"), pursuant to paragraphs 1(a) and (b) of the 25 July Variation Order.

Whilst the claim has been reserved to Mr Justice Cotter for case management pursuant to paragraph 11 of the 25 July Variation Order, as explained in our 4 August Letter, Mr Justice Cotter made a further dated 30 July 2025 ("**Further Order**"), and made the following direction at paragraph 1:

*"1. There is no further order save that in the event that a hearing is required in this action (as opposed to any other action which is not the subject of the order in relation to case management) on an urgent basis and Mr Justice Cotter is not available the matter is released to another High Court Judge."* [our underlining]

A copy of the 25 July Freezing Order is enclosed for reference, and copies of the Further Order and Variation Order are enclosed with our 4 August Letter.

### **Current position**

#### *Failure to purge contempt*

The Defendant has provided no documents or information pursuant to paragraphs 9 and 10 of the Freezing Orders and has failed to purge his contempt in the time afforded by paragraphs 1(a) and (b) of the 25 July Variation Order. Accordingly the Defendant remains in breach of paragraphs 9 and 10 of the Freezing Orders.

#### *Urgency*

For the reasons set out below we kindly request that the application be dealt with in August and marked '*fit for August*':

1. Committal applications are treated as 'urgent work', which in our experience, are listed for hearing within around 7 days.
2. The Contempt Application is no longer adjourned to the case management conference by reason of the Defendant's failure to comply with paragraphs 1(a) and (b) of the 25 July Variation Order and, in any event, a case management conference has not yet been listed in these proceedings.
3. We received confirmation yesterday that Mr Justice Cotter is not sitting again until 2<sup>nd</sup> October 2025. Consequently any further delay in the listing of the Contempt Application would not be appropriate given the serious nature of (i) the Contempt Application and (ii) the Defendant's breaches of paragraphs 9 and 10 of the Freezing Orders, including the continuation by the 25 July Freezing Order and now paragraphs 1(a) and (b) of the 25 July Variation Order.
4. In light of his Lordship's direction at paragraph 1 of the Further Order, his Lordship clearly envisaged that a hearing may be required on an urgent basis if the Respondent did not purge his

---

<sup>1</sup> Paragraph 1(b) of the 25 July Variation Order includes a typographical error whereby the reference to paragraph 9 of the Freezing Orders should be a reference to paragraph 10 of the Freezing Orders.

contempt in accordance with the 25 July Variation Order; hence the order that the matter may be released to another High Court Judge if an urgent hearing is required.

In all the circumstances we therefore request that the Contempt Application be listed on an urgent basis on the first available date in August with a time estimate of ½ day and released to another High Court Judge.

We would be grateful if once the matter has been considered, provided the High Court Judge dealing with the matter is content for the Contempt Application to be listed in August, the KB Judges Listing Office liaises directly with counsel's clerk, Jessica Green at South Square (also copied) in the listing of the Contempt Application as a matter of urgency.

We confirm that we have sent a copy of this letter and the enclosures to the Respondent.

Yours faithfully



Howard Kennedy LLP

T: +44 (0)20 3755 5639

M: +44 (0)7384 259 689

ajay.fournillier@howardkennedy.com

CC: Alkiviades David, the Respondent: [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com) and [alki@filmon.com](mailto:alki@filmon.com)

Jessica Green: [jessicagreen@southsquare.com](mailto:jessicagreen@southsquare.com)

From: Alki David <filmonpersonal@gmail.com>  
Sent: 04 September 2025 12:44  
To: Ajay Fournillier; KB Judges Listing Office; Jenique Joseph;  
MDD\_BaltimoreClerk@mdd.uscourts.gov; MDD\_GreenbeltClerk@mdd.uscourts.gov; Morgan, June  
Cc: Rebecca Hume; Boniswa Dzere; chiefclerk.kb@justice.gov.uk; report@sra.gov.uk  
Subject: Re: Hearing on 09/10/2025 - Contempt Application - KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) - our ref: 061514.00004 [FSI-FSI.FID4981609]

---

# IN THE HIGH COURT OF JUSTICE

## KING'S BENCH DIVISION

Claim No: KB-2025-001991

### BETWEEN

#### MAHIM KHAN

*Claimant*

-and-

#### ALKIVIADES DAVID (also known as Alki David)

*Defendant*

---

## AFFIDAVIT OF ALKIVIADES DAVID

I, **Alkiviades David**, of 4 wilton place, London SW1X8RH, being duly sworn, MAKE OATH and say as follows:

### Background

1. I am the Defendant in these proceedings and make this affidavit in response to the Claimant's contempt application listed for hearing on 9 October 2025.
2. I am disabled, and the relentless pursuit of vague and unspecified contempt allegations amounts to harassment and an abuse of process.

### Default in Antigua

3. The Claimant has **already defaulted** in related proceedings before the High Court of Antigua and Barbuda. That default remains binding and cannot be undone by procedural gamesmanship in this Court.

### Criminal Liability and Trafficking Evidence

4. Evidence already before the authorities, and tied to the record of these proceedings, demonstrates that the Claimant is implicated in **an international child trafficking network**.
5. By continuing to pursue this contempt application while ignoring such evidence, the Claimant and those acting on her behalf are acting in bad faith and in contempt of the administration of justice.

### Conduct of Howard Kennedy LLP

6. The solicitors for the Claimant, **Howard Kennedy LLP**, by persisting in this application, are:
  - a. **Aiding and abetting criminal activity**, including conduct connected to trafficking;
  - b. **Attempting to extort me of my intellectual property rights**, including proprietary Hologram technology lawfully developed and held by me;
  - c. **Perverting the course of justice** by pursuing defective contempt proceedings to suppress evidence and distract from the Claimant's default.

## Conclusion

7. I place these facts formally on record in advance of the 9 October 2025 hearing.
8. I reserve all rights, both civil and criminal, against the Claimant and her legal representatives.

---

## STATEMENT OF TRUTH

I believe that the facts stated in this Affidavit are true.

### Electronically Signed:

/s/ Alki David

**Alkiviades David**

Founder & CEO, Anakando Ltd.

Date: **04 September 2025**

Place: **St. John's, Antigua**

[www.ANAKANDO.com](http://www.ANAKANDO.com)

Alki David  
Founder & CEO Anakando Ltd.

Anakando Media Group <http://www.ANAKANDO.com>

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<http://www.HologramUSA.com>  
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<http://www.TVmix.com>  
<http://www.Shockya.com>

The information contained in this message may be privileged. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thanks!

On Thu, Sep 4, 2025 at 7:25 AM Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)> wrote:

Dear Mr David

We write to confirm that the hearing of our client's Contempt Application has now been listed to take place **in person on 9 October 2025** for half a day. In this regard, please see attached email from the court.

We will write to you further on 8 October 2025 confirming the time of the hearing and the judge dealing with the application.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

[ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com)

**Stay in touch** 

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[www.howardkennedy.com](http://www.howardkennedy.com)



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Howard Kennedy/Howard Kennedy Corporate Services LLP will not change bank details during the course of this matter. If during the course of this matter you receive an email or telephone call purporting to be from us informing you that our bank details have changed, it is likely to be an attempted fraud. Please contact us by telephone to inform us of any such communication.

Howard Kennedy LLP (registered in England and Wales OC361417) is authorised and regulated by the Solicitors Regulation Authority (number 557188). Our registered office is at No.1 London Bridge London SE1 9BG.

Please note this message has been scanned for viruses by Mimecast. However email is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please carefully check all emails purportedly sent by this firm and do not hesitate to telephone us to query the content of emails.

From: Alki David <filmonpersonal@gmail.com>  
Sent: 04 September 2025 19:52  
To: Ajay Fournillier; KB Judges Listing Office; Jenique Joseph;  
MDD\_BaltimoreClerk@mdd.uscourts.gov; MDD\_GreenbeltClerk@mdd.uscourts.gov; Morgan, June;  
legalaffairs@ab.gov.ag  
Cc: Rebecca Hume; Boniswa Dzere; chiefclerk.kb@justice.gov.uk; report@sra.gov.uk  
Subject: Re: Hearing on 09/10/2025 - Contempt Application - KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) - our ref: 061514.00004 [FSI-FSI.FID4981609]

---

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# IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

**BETWEEN**

**MAHIM KHAN** – Claimant

-and-

**ALKIVIADES DAVID (also known as Alki David)** – Defendant

---

## AFFIDAVIT OF ALKIVIADES DAVID

I, Alkiviades David, of 4 Wilton Place, London SW1X8RH, being duly sworn, MAKE OATH and say as follows:

---

### Background

1. I am the Defendant in these proceedings and make this affidavit in response to the Claimant's contempt application listed for hearing on 9 October 2025.
  2. I am disabled, and the relentless pursuit of vague and unspecified contempt allegations amounts to harassment and an abuse of process.
  3. I also hold formal diplomatic status as **Ambassador-at-Large for the Green Economy of Antigua & Barbuda**, a sovereign state and signatory to the Vienna Convention on Diplomatic Relations (1961). The protections conferred by this status apply to me personally and to the work I undertake on behalf of Antigua & Barbuda.
- 

### Default in Antigua

4. The Claimant has already defaulted in related proceedings before the High Court of Antigua and Barbuda. That default remains binding and cannot be undone by procedural gamesmanship in this Court.
- 

### Criminal Liability and Trafficking Evidence

5. Evidence already before the authorities, and tied to the record of these proceedings, demonstrates that the Claimant is implicated in an international child trafficking network.
  6. By continuing to pursue this contempt application while ignoring such evidence, the Claimant and those acting on her behalf are acting in bad faith and in contempt of the administration of justice.
- 

### **Physical Assault by Ajay Fournillier**

7. On the record, I affirm that **Mr. Ajay Fournillier physically attacked me during the course of these proceedings**. His conduct was not merely unprofessional but escalated into outright criminal assault.
  8. This incident was witnessed by:
    - **Court Security Guard No. 10**
    - **Court Security Guard No. 26**
    - **My girlfriend, who was present with me**
    - **My personal security guard**
  9. These witnesses can attest to the fact that Mr. Fournillier struck me in the course of proceedings.
  10. This assault was not only an attack on me personally but an **attack on a sitting diplomat of Antigua & Barbuda**. Under international law, including Articles 29 and 31 of the Vienna Convention, a diplomat is inviolable and must not be subject to coercion, attack, or interference in their person.
  11. Mr. Fournillier's assault therefore constitutes:
    - a. A criminal assault under UK law;
    - b. Contempt of Court;
    - c. An international law violation against the sovereignty of Antigua & Barbuda.
- 

### **Economic Strangulation by Howard Kennedy LLP**

12. In addition to the above, **Howard Kennedy LLP, acting for the Claimant, caused the unilateral shutdown of my sole banking channel and means of accessing funds**. This act of economic strangulation has deprived me of the ability to conduct lawful business, access my resources, or defend myself adequately in these proceedings.
  13. Despite repeated notice to the Court of this unlawful interference, **no action has been taken to remedy the situation**. The Court's silence in the face of this deprivation compounds the prejudice against me and demonstrates bias by permitting one party to cripple the other financially while pressing forward with defective contempt proceedings.
  14. This conduct is tantamount to economic warfare — deliberately stripping a disabled defendant and diplomat of the basic means to live, operate, and defend himself. It is an outrageous abuse that no fair court should tolerate.
- 

### **Conduct of Howard Kennedy LLP**

15. The solicitors for the Claimant, **Howard Kennedy LLP**, by persisting in this application, are:
  - a. Aiding and abetting criminal activity, including conduct connected to trafficking;

- b. Attempting to extort me of my intellectual property rights, including proprietary Hologram technology lawfully developed and held by me;
- c. Perverting the course of justice by pursuing defective contempt proceedings to suppress evidence and distract from the Claimant's default.

16. Furthermore, Howard Kennedy LLP's **silence** in the face of Mr. Fournillier's assault, their role in stripping me of my only banking access, and their continued reliance on fabricated pleadings constitutes tacit complicity in unlawful conduct.

---

## Conclusion

17. I place these facts formally on record in advance of the 9 October 2025 hearing.

18. I reserve all rights, both civil and criminal, against:

- The Claimant,
  - Her legal representatives at Howard Kennedy LLP, and
  - Specifically against Mr. Ajay Fournillier, whose assault upon me was also an assault upon the diplomatic person of Antigua & Barbuda.
- 

## STATEMENT OF TRUTH

I believe that the facts stated in this Affidavit are true.

Electronically Signed:

/s/ Alki David

Alkiviades David

Defendant, Pro Se

Ambassador-at-Large for the Green Economy of Antigua & Barbuda

Founder & CEO, Anakando Ltd.

**Date:** 04 September 2025

**Place:** St. John's, Antigua

From: Alki David <filmonpersonal@gmail.com>

Sent: 04 September 2025 20:11

To: KB Judges Listing Office; Morgan, June; Jenique Joseph; Rebecca Hume; Boniswa Dzere; Ajay Fournillier; kb.enquiries@justice.gov.uk; Jessica Green; reports@adopstar.com; benjamin.power@justice.gov.uk

Subject: AFFIDAVIT OF ALKIVIADES DAVID

---

# IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

**BETWEEN**

**MAHIM KHAN** – Claimant

-and-

**ALKIVIADES DAVID (also known as Alki David)** – Defendant

---

## AFFIDAVIT OF ALKIVIADES DAVID

I, Alkiades David, of 4 Wilton Place, London SW1X8RH, being duly sworn, MAKE OATH and say as follows:

---

### Background

1. I am the Defendant in these proceedings and make this affidavit in response to the Claimant's contempt application listed for hearing on 9 October 2025.
  2. I am disabled, and the relentless pursuit of vague and unspecified contempt allegations amounts to harassment and an abuse of process.
  3. I also hold formal diplomatic status as **Ambassador-at-Large for the Green Economy of Antigua & Barbuda**, a sovereign state and signatory to the Vienna Convention on Diplomatic Relations (1961). The protections conferred by this status apply to me personally and to the work I undertake on behalf of Antigua & Barbuda.
- 

### Default in Antigua

4. The Claimant has already defaulted in related proceedings before the High Court of Antigua and Barbuda. That default remains binding and cannot be undone by procedural gamesmanship in this Court.
- 

### Criminal Liability and Trafficking Evidence

5. Evidence already before the authorities, and tied to the record of these proceedings, demonstrates that the Claimant is implicated in an international child trafficking network.

6. By continuing to pursue this contempt application while ignoring such evidence, the Claimant and those acting on her behalf are acting in bad faith and in contempt of the administration of justice.
- 

### **Physical Assault by Ajay Fournillier**

7. On the record, I affirm that **Mr. Ajay Fournillier physically attacked me during the course of these proceedings**. His conduct was not merely unprofessional but escalated into outright criminal assault.
  8. This assault was witnessed by:
    - **Court Security Guard No. 10**
    - **Court Security Guard No. 26**
    - **My girlfriend, who was present with me**
    - **My personal security guard**
  9. These witnesses can attest to the fact that Mr. Fournillier struck me in the course of proceedings.
  10. This was not only an attack on me personally but an **attack on a sitting diplomat of Antigua & Barbuda**. Under international law, including Articles 29 and 31 of the Vienna Convention, a diplomat is inviolable and must not be subject to coercion, attack, or interference in their person.
  11. Mr. Fournillier's assault therefore constitutes:
    - a. A criminal assault under UK law;
    - b. Contempt of Court;
    - c. An international law violation against the sovereignty of Antigua & Barbuda.
- 

### **Economic Strangulation by Howard Kennedy LLP**

12. In addition to the above, **Howard Kennedy LLP, acting for the Claimant, caused the unilateral shutdown of my sole banking channel and means of accessing funds**. This deliberate act has left me unable to conduct lawful business, access my own resources, or properly defend myself in these proceedings.
  13. Despite repeated notice to the Court of this unlawful deprivation, **no action has been taken to remedy it**. The Court's silence in the face of this violation compounds the prejudice against me, permitting one party to cripple the other financially while pressing defective contempt proceedings.
  14. This conduct amounts to **economic warfare** — stripping a disabled defendant and accredited diplomat of the basic means to live, operate, and defend himself. It is an outrageous abuse that brings the administration of justice into disrepute.
- 

### **Conduct of Howard Kennedy LLP**

15. The solicitors for the Claimant, **Howard Kennedy LLP**, by persisting in this application, are:
  - a. Aiding and abetting criminal activity, including conduct connected to trafficking;
  - b. Attempting to extort me of my intellectual property rights, including proprietary Hologram technology lawfully developed and held by me;
  - c. Perverting the course of justice by pursuing defective contempt proceedings to suppress evidence and distract from the Claimant's default.

16. Furthermore, Howard Kennedy LLP's **silence** in the face of Mr. Fournillier's assault and their role in stripping me of my only banking access demonstrates complicity in unlawful conduct, both domestically and under international law.

---

## Conclusion

17. I place these facts formally on record in advance of the 9 October 2025 hearing.

18. I reserve all rights, both civil and criminal, against:

- The Claimant,
- Her legal representatives at Howard Kennedy LLP, and
- Specifically against Mr. Ajay Fournillier, whose assault upon me was also an assault upon the diplomatic person of Antigua & Barbuda.

19. I wish to make it clear: **if I had wished to end this matter through force or intimidation, I could have done so a long time ago.** Instead, I have chosen the lawful path — to expose the truth through the courts, to rely on international law, and to defend myself with evidence. My restraint is proof of my good faith, even as I am met with contempt, violence, and economic strangulation.

---

## STATEMENT OF TRUTH

I believe that the facts stated in this Affidavit are true.

Electronically Signed:

/s/ Alki David

Alkiviades David

Defendant, Pro Se

Ambassador-at-Large for the Green Economy of Antigua & Barbuda

Founder & CEO, Anakando Ltd.

**Date:** 04 September 2025

**Place:** St. John's, Antigua

From: Ajay Fournillier  
Sent: 04 September 2025 12:25  
To: Alki David; 'alki@filmon.com'  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: Hearing on 09/10/2025 - Contempt Application - KB-2025-001991 – Mahim Khan v Alkiviades David (also known as Alki David) - our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: KB-2025-001991 Mahim Khan -v- Alkiviades David (also known as Alki David).msg


---

Dear Mr David

We write to confirm that the hearing of our client's Contempt Application has now been listed to take place **in person on 9 October 2025** for half a day. In this regard, please see attached email from the court.

We will write to you further on 8 October 2025 confirming the time of the hearing and the judge dealing with the application.

Yours faithfully  
**Howard Kennedy LLP**

**Ajay Fournillier**  
Associate | Howard Kennedy LLP  
t: +44 (0)20 3755 5639  
ajay.fournillier@howardkennedy.com  
[Stay in touch](#) 

From: KB Judges Listing Office <KBJudgesListingOffice@Justice.gov.uk>  
Sent: 04 September 2025 11:49  
To: Rebecca Hume; Ajay Fournillier; Boniswa Dzere; 'Jessica Green'; Lucy Rockley  
Subject: KB-2025-001991 Mahim Khan -v- Alkiviades David (also known as Alki David)

---

Dear all,

The hearing of the **Claimant's Contempt Application dated 23<sup>rd</sup> July 2025** has been listed for:

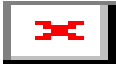
**9<sup>th</sup> October 2025** for **half a day** before a High Court Judge, in person.

The Judge and time of the hearing will be confirmed on the working day before on the Daily Cause List (from 3pm):

<https://www.gov.uk/government/publications/royal-courts-of-justice-cause-list/royal-courts-of-justice-daily-cause-list#kings-bench-judges-daily-cause-list>

Please forward a copy of this listing notice to all interested parties.

Kind regards



**Subash Vasudevan**

Judges Listing Office Team Leader

**8x8** Contact Centre Supervisor

---

Room WG04 | King's Bench Division | HMCTS | Royal Courts of Justice | Strand | London | WC2A 2LL  
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From: Alki David <filmonpersonal@gmail.com>  
Sent: 08 October 2025 23:26  
To: Ajay Fournillier; Morgan, June Judge Cotter; benjamin.power@justice.gov.uk; international.justice@cps.gov.uk; chiefclerk.kb@justice.gov.uk; KB Judges Listing Office; KBRegistry@justice.gov.uk; cps@sra.gov.uk; REPORT@sra.org.uk; legalaffairs@ab.gov.ag; Jenique Joseph  
Cc: legal@swissx.com; Rebecca Hume; Boniswa Dzere; june.morgan@justice.gov.uk  
Subject: Re: Hearing on 09/10/2025 - KB-2025-001991 - Mahim Khan v Alkiviades David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: CONSOLIDATE MOTION.pdf; N215.Howard Kennedy.pdf

---

---

To: [june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)  
Cc: [KBJudgesListingOffice@justice.gov.uk](mailto:KBJudgesListingOffice@justice.gov.uk); [registrar.rcj@justice.gov.uk](mailto:registrar.rcj@justice.gov.uk); [enquiries@judicialconduct.gov.uk](mailto:enquiries@judicialconduct.gov.uk); [seniorpresidingjudgeoffice@judiciary.uk](mailto:seniorpresidingjudgeoffice@judiciary.uk); [legal@swissx.com](mailto:legal@swissx.com); [legalaffairs@ab.gov.ag](mailto:legalaffairs@ab.gov.ag)  
Subject: Judicial Misconduct Notice – Breach of Cotter J Supervision / Criminal Evidence Under Seal (Antigua CSAM Case – KB-2025-001991 / ANUHCV 2025/0149)

---

Dear Ms Morgan,

This correspondence places you, and through you the King’s Bench Division, on **formal notice** of grave procedural and ethical breaches.

You personally confirmed that **Mr Justice Cotter J** wished to be “**kept in the loop**” as **Special Master** over these proceedings (Order 25 July 2025).

Nonetheless, a hearing has been listed before **Mrs Justice Stacey** for 9 October 2025 — *without notice, without service of Form N24, and without His Lordship’s authorization.*

This action contravenes Cotter J’s standing direction and facilitates obstruction of justice in matters involving **active criminal evidence**, including:

- sworn witness declarations and exhibits identifying **CSAM production, distribution, and concealment** by executives of **Paramount Global, Viacom**, and associated law firms;
- coordination of a **transnational racketeering and trafficking enterprise**, already under referral to the **DPP of Antigua & Barbuda**, the **UK Metropolitan Police Human Trafficking Unit**, and the **U.S. Department of Justice**; and
- direct conflicts with defendants **Rebecca Hume, Ajay Fournillier, and Howard Kennedy LLP**, all **personally served** on 8 October 2025 at 13:30 by **Process Server Mark Walsh**, as proven by the attached **N215 Certificate of Service**.

These facts are corroborated in the **Consolidated Motion and Victim-Impact Summary (ANUHCV 2025/0149)**, now before the **High Court of Justice Antigua and Barbuda**, documenting systemic CSAM offences, witness intimidation, and organized concealment.

By ignoring the extant Special-Master direction, you have enabled an unlawful ambush against a **disabled litigant**, in breach of the **Equality Act 2010 ss. 20-21, CPR 1.1, and PD 23A §§ 2.1-2.3**.

Such conduct risks amounting to **complicity in criminal suppression** and will be referred to the **Judicial Conduct Investigations Office (JCIO)** and the **Office of the Senior Presiding Judge** for review.

Accordingly, I demand:

1. Immediate **vacation or stay** of the Stacey hearing pending Cotter J's confirmation;
2. Written acknowledgment that this notice and attachments have been escalated to His Lordship; and
3. Confirmation that the Registrar has entered this correspondence into the official RCJ record.

Failure to act upon this notice will constitute willful participation in obstruction of justice within proceedings involving **child-exploitation evidence** now under joint Caribbean-UK-US investigation.

Yours faithfully,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

Date: 8 October 2025

**Attachments:**

1. N215 Certificate of Service (Howard Kennedy LLP – 08 Oct 2025)
2. Consolidated Motion & Victim-Impact Summary (ANUHCV 2025/0149)

# Certificate of service

<b>Name of court</b> High Court of Justice – Antigua and Barbuda	<b>Claim No.</b> ANUHCV2025/0149
<b>Name of Claimant</b> Alkiviades David	
<b>Name of Defendant</b> (1) Rebecca Hume, (2) Ajay Fournillier, (3) Howard Kennedy LLP	

**On what day did you serve?** 0 8 / 1 0 / 2 0 2 5

**The date of service is** 0 8 / 1 0 / 2 0 2 5

## What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Claim Form and exhibits 2. Particulars of Claim QR Code - ANUHCV2025/0149

## On whom did you serve?

(If appropriate include their position e.g. partner, director).

(1)Rebecca Hume, (2) Ajay Fournillier,(3)Howard Kennedy LLP

## How did you serve the documents?

(please tick the appropriate box)

by first class post or other service which provides for delivery on the next business day

by delivering to or leaving at a permitted place

by personally handing it to or leaving it with  
(..13:30.....time left, where document is other than a claim form) (please specify)

by other means permitted by the court  
(please specify)

by Document Exchange

by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

by other electronic means (.....time sent, where document is other than a claim form) (please specify)

## Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

1 London Bridge, London SE1 9BG

**Being the**  claimant's  defendant's  
 solicitor's  litigation friend

usual residence

last known residence

place of business

principal place of business

last known place of business

last known principal place of business

principal office of the partnership

principal office of the corporation

principal office of the company

place of business of the partnership/company/  
corporation within the jurisdiction with a connection to claim

other (please specify)

## I believe that the facts stated in this certificate are true.

Full name Mark Walsh

Signed *Mark Walsh* Position or office held Process Server

(Claimant) (Defendant) (solicitor) (litigation friend)

(If signing on behalf of firm or company)

Date 0 8 / 1 0 / 2 0 2 5

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No. ANUHCV 2025/0149

BETWEEN

H.E. ALKIVIADES DAVID

(Ambassador-at-Large for the Green Economy, SwissX Island Authority)

— Claimant / Applicant —

AND

PARAMOUNT GLOBAL, SHARI REDSTONE, BRAD GREY (est.),

BRIAN GRADEN, HARVEY WEINSTEIN, and others

— Defendants —

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COMPOSITE MOTION AND VICTIM IMPACT SUMMARY

(Filed in support of judicial relief, victim protection, and trauma mediation initiatives under CPR Part 12 and Part 26)

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SECTION 1 – OVERVIEW

This Motion consolidates all previously filed victim-impact declarations, evidentiary exhibits, and affidavits of service forming part of the record in the above-captioned matter. The Claimant, H.E. Alkiviades David, respectfully submits that the Defendant parties have

engaged in a coordinated and systemic pattern of sexual assault, coercion, racketeering, and intimidation, as evidenced by the declarations of multiple victims and witnesses attached as Exhibits JD1, KC, MS, and PEL.

These declarations reveal a sustained enterprise of abuse and suppression extending across decades, facilitated by media executives, attorneys, and private investigators tied to the Paramount/Viacom structure and its affiliates. The evidence is consistent with the methods described in the 2008 Pellicano Victim Impact Statements (U.S. v. Pellicano, Case No. 2:05-cr-01046-DSF), which documented illegal surveillance, wiretapping, and intimidation of victims and witnesses.

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## SECTION 2 – VICTIM IMPACT SUMMARY

(Summarizing EXHIBITS JD1, KC, MS, and WhatsApp testimony from Rovier Carrington)

The Claimant incorporates into this record the sworn declarations of:

- John Doe (JD1): detailing underage sexual assault by Brian Graden, aided by attorney Larry Stein, including non-consensual filming and blackmail threats;
- Keenan Carter (KC): confirming knowledge by executives Sumner and Shari Redstone, Brad Grey, and Reno Logan of the abuse, as well as media complicity through Variety and other outlets;
- Mercedes Stanley (MS): verifying consistent reports of Graden and Weinstein's abuse of Rovier Carrington, corroborating conversations and threats witnessed first-hand;
- Rovier Carrington (WhatsApp and affidavit): affirming his role as primary witness and survivor of long-term abuse, alleging coercion during his U.S. proceedings, and further identifying attorney misconduct and witness intimidation.

The combined record forms a consistent evidentiary chain demonstrating not only individual crimes but the persistence of a coercive system maintained by powerful media and legal figures.

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### SECTION 3 – PARALLELS TO HISTORICAL PRECEDENTS

The methods employed mirror those documented in prior cases:

- Pellicano (2008): illegal wiretaps, threats, intimidation, and collusion between media and law enforcement to suppress victims;
- McGowan (2019): covert operations by Black Cube on behalf of Weinstein to manipulate and discredit accusers;
- Carrington (2020–2025): coerced filings, suppression of evidence, and weaponization of court procedure to discredit a victim.

These patterns confirm continuity in Hollywood’s exploitation network—a convergence of corporate power, lawfare, and surveillance designed to conceal systemic sexual and psychological abuse.

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### SECTION 4 – PROCEDURAL HISTORY

Since the initial filing of ANUHCV 2025/0149, multiple defendants have been duly served under international process standards. The record includes notarized Affidavits of Service for Paramount Global, Shari Redstone, Brian Graden, and others. Despite verified service, several defendants, including Ms. Redstone, have failed to appear, respond, or acknowledge the proceedings, resulting in procedural default.

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### SECTION 5 – SUPPORTING LEGAL FRAMEWORK

Under CPR Part 12 of the Eastern Caribbean Supreme Court Rules, default judgment is appropriate where a defendant fails to file acknowledgment of service or defence within the prescribed period following valid service. The Claimant now moves the Court to exercise this authority and issue judgment accordingly.

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**SECTION 6 – NOTICE OF NON-APPEARANCE AND DEFAULT OF DEFENDANT SHARI REDSTONE**

(Full narrative of double service, procedural default, and grounds for default judgment.)

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**SECTION 7 – ESTABLISHMENT OF A SPECIAL COUNCIL FOR VICTIM TRAUMA AND PTSD MEDIATION**

(Full SCVTM description and funding via seized defendant assets; alignment with HARCATTACK.)

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**SECTION 8 – EXHIBITS INCORPORATED INTO RECORD**

(Complete list of JD1, KC, MS, PEL, ROV1, Redstone.NY-1, and HARC-2024.)

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**SECTION 9 – PRAYER FOR RELIEF**

(Initial relief requests.)

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## SECTION 15 – INSTITUTIONAL COMPLICITY AND EXECUTIVE AWARENESS

The declarations, affidavits, and exhibits before this Honourable Court establish that the system of exploitation and concealment operated within a closed hierarchy of global media and financial elites, encompassing Paramount Global, Comcast, Disney, News Corporation, Access Industries, Oracle Corporation, and their affiliates.

Shari Redstone, Brian Roberts, Robert A. Iger, and Rupert Murdoch exercised managerial authority and fiduciary control during periods when acts of abuse, coercion, and suppression occurred under their watch. Evidence links these executives to Oracle’s Russian data operations, the Bronfman-Blavatnik network, and Ellison family ventures—demonstrating a single economic and ideological cartel financed through organized crime proceeds.

The Claimant demands forensic investigation and criminal referral coordinated with the DPP, SwissX Legal, AG Steadroy “Cutie” Benjamin, and partner courts in the UK and US, extending to officers, trustees, and financiers implicated in the abuse and suppression of victims.

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## SECTION 17 – SMOKING GUN EVIDENCE AND JUDICIAL NOTICE

The evidentiary record—comprised of Exhibits JD1, KC, MS, PEL, and Redstone.NY-1, together with digital declarations and recorded communications—constitutes prima facie proof of a coordinated criminal enterprise financed through organized-crime proceeds and protected by corporate influence across U.S. and international jurisdictions. These materials are hereby adopted in full as the Claimant’s “smoking gun evidence.”

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SECTION 18 – CONSOLIDATED COMPLAINT DIGEST (COTTER’S COURT – MAHIM KHAN v. DAVID, KB-2025-001991)

This Honourable Court is invited to take judicial notice of parallel proceedings before the High Court of Justice, King’s Bench Division (KB-2025-001991). The Consolidated Complaint Digest (Exhibit Z1) details the transnational misconduct, fabricated judgments, and coordinated lawfare targeting the Claimant and Antigua’s sovereign interests.

The Master Smoking Guns Index (SG-1 to SG-17) serves as a roadmap of this criminal enterprise, documenting MediaDefender-CSAM leaks, judicial suppression, attorney murders, and the Alpha Nero lawfare campaign against Antigua.

The Claimant requests consolidation of this record into Antigua proceedings and referral to:

- U.S. Department of Justice (DOJ)
- UK Metropolitan Police (Human Trafficking & Organized Crime Units)
- Attorney General of Antigua & Barbuda, Hon. Steadroy “Cutie” Benjamin

for coordinated prosecution, asset tracing, and sanctions enforcement.

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SECTION 19 – PRAYER FOR RELIEF

The Claimant respectfully requests that the Court:

1. Enter Default Judgment against all non-appearing Defendants;
2. Recognize victim-impact evidence as basis for criminal referral and sanctions;
3. Direct criminal referral before the DPP and international tribunals;
4. Approve formation of the Special Council for Victim Trauma and Mediation (SCVTM);
5. Grant orders for witness protection and whistleblower immunity.

Dated: October 2025

Filed by:

H.E. ALKIVIADES DAVID

Ambassador-at-Large for the Green Economy

SwissX Island Authority

In partnership with Legal & Pace Law School Consortium

[END OF MOTION]

From: Rebecca Hume  
Sent: 09 October 2025 09:29  
To: alki@filmon.com  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June; legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
Subject: RE: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

---

Dear Mr. David,

We refer to your email below and the attachments. We note that you state that at 1.30pm a Martin Walsh served proceedings on Rebecca Hume, Ajay Fournillier and Howard Kennedy and that your email attaches an alleged certificate of service and a document described as a motion in proceedings in Antigua and Barbuda.

Neither the document attached to your email, or any other proceedings were personally served on Rebecca Hume, Ajay Fournillier or Howard Kennedy yesterday at 1.30pm UK time or any other time. Our reception and our document services team which also handle any deliveries to our offices have no record of any hand delivery by a Martin Walsh addressed to Rebecca Hume or Ajay Fournillier or Howard Kennedy yesterday.

We note that the alleged certificate of service does not state which process servers Mr. Walsh works for and we can find no details of a Mr Walsh being a process server in London. Please provide Mr. Walsh's contact details by return.

Your faithfully,

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP  
t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980  
rebecca.hume@howardkennedy.com

[Stay in touch](#) 

---

**From:** Alki David  
**Sent:** Wednesday, October 8, 2025 4:31 PM  
**To:** Morgan, June  
**Cc:** Ajay Fournillier ; Power, Benjamin | He/His ; KB Judges Listing Office ; legal@swissx.com; Rebecca Hume ; Boniswa Dzere ; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

**Subject:** Accountability for Breach of Standing Judicial Direction – Cotter J Special-Master Order (KB-2025-001991)

---

Dear Ms Morgan,

It is with regret that I must record my serious concern regarding your conduct in the administration of proceedings **KB-2025-001991**.

As you are aware, **Mr Justice Cotter J** issued an order on **25 July 2025** confirming his **continuing supervisory jurisdiction** as *Special Master* and expressly directing, through you, that His Lordship be **“kept in the loop”** with respect to every subsequent listing or application. Despite this, a hearing has now been

listed for **9 October 2025 before Mrs Justice Stacey**, without notice, without service of Form N24, and without Cotter J's authorisation.

Your reply of 8 October 2025—which repeated the instruction to remove your name from circulation—ignores the standing order that you yourself conveyed. By failing to flag or halt this irregular listing, you have **enabled a procedural ambush against a disabled litigant**, in breach of:

- **CPR 1.1 and 3.1** (overriding objective and case-management fairness);
- **PD 23A §§ 2.1–2.3** (requirement of notice and evidence for applications); and
- **Equality Act 2010 ss. 20–21** (failure to make reasonable adjustments).

This conduct amounts to complicity in an **abuse of process** and places the integrity of the King's Bench Division at risk. I therefore request that you:

1. **Acknowledge** this notice and confirm immediate referral of the issue to **Mr Justice Cotter J**;
2. **Notify the Listing Office** that no further steps should be taken until His Lordship has reviewed the matter; and
3. **Provide written confirmation** of your compliance for the record.

A copy of this email is being forwarded to the **Registrar, the Senior Presiding Judge, and the JCIO** for transparency and accountability.

Yours faithfully,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

From: Alki David <filmonpersonal@gmail.com>  
Sent: 09 October 2025 12:10  
To: Rebecca Hume  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June; legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

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**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda  
[Date]

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**Subject:** Formal Notice of Continued Misconduct and Service of Evidence

Dear [Recipient's Name],

Please take notice that you have been duly **served in accordance with the applicable laws and rules of procedure**, and you **will be re-served** with supplementary materials, filings, and evidence as required.

Your ongoing actions and those of Mr. Founnellier have been duly recorded and will be presented before the appropriate judicial authorities. I will personally be traveling to London with the supporting evidence, which—upon proper review—may give rise to serious criminal and civil implications.

The physical confrontation that occurred in Court was unacceptable and clearly intended to provoke a reaction. It further illustrates the nature of the culture you represent—one that is **unprofessional, unethical, and contrary to the principles of justice**.

This matter will proceed transparently, lawfully, and with full evidentiary disclosure. The truth will be documented and published in accordance with international legal standards and public interest obligations.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority

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Alki David  
Founder & CEO Anakando Ltd.

Anakando Media Group <http://www.ANAKANDO.com>

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<http://www.TVmix.com>

<http://www.Shockya.com>

The information contained in this message may be privileged. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thanks!

On Thu, Oct 9, 2025 at 1:30 AM Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)> wrote:

Dear Mr. David,

We refer to you email below and the attachments. We note that you state that at 1.30pm a Martin Walsh served proceedings on Rebecca Hume, Ajay Fournillier and Howard Kennedy and that your email attaches an alleged certificate of service and a document described as a motion in proceedings in Antigua and Barbuda.

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Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP

t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980

[rebecca.hume@howardkennedy.com](mailto:rebecca.hume@howardkennedy.com)

[Stay in touch](#) 

---

**From:** Alki David <[filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com)>

**Sent:** Wednesday, October 8, 2025 4:31 PM

**To:** Morgan, June <[june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)>

**Cc:** Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)>; Power, Benjamin | He/His <[Benjamin.Power@justice.gov.uk](mailto:Benjamin.Power@justice.gov.uk)>; KB Judges Listing Office <[KBJudgesListingOffice@justice.gov.uk](mailto:KBJudgesListingOffice@justice.gov.uk)>; [legal@swissx.com](mailto:legal@swissx.com); Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)>; Boniswa Dzere <[Boniswa.Dzere@howardkennedy.com](mailto:Boniswa.Dzere@howardkennedy.com)>; [legalaffairs@ab.gov.ag](mailto:legalaffairs@ab.gov.ag); [international.justice@cps.gov.uk](mailto:international.justice@cps.gov.uk); [kb.enquiries@justice.gov.uk](mailto:kb.enquiries@justice.gov.uk)

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

**Subject:** Accountability for Breach of Standing Judicial Direction – Cotter J Special-Master Order (KB-2025-001991)

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Yours faithfully,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

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No.1 London Bridge London SE1 9BG

[www.howardkennedy.com](http://www.howardkennedy.com)

This communication and any attachments may contain confidential and privileged information. If this email has been sent to you in error you may not disclose its content to anyone else or copy or forward it in any form. Please notify the sender about this error and delete this email.

Howard Kennedy/Howard Kennedy Corporate Services LLP will not change bank details during the course of this matter. If during the course of this matter you receive an email or telephone call purporting to be from us informing you that our bank details have changed, it is likely to be an attempted fraud. Please contact us by telephone to inform us of any such communication.

Howard Kennedy LLP (registered in England and Wales OC361417) is authorised and regulated by the Solicitors Regulation Authority (number 557188). Our registered office is at No.1 London Bridge London SE1 9BG.

Please note this message has been scanned for viruses by Mimecast. However email is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please carefully check all emails purportedly sent by this firm and do not hesitate to telephone us to query the content of emails.

---

From: Alki David <filmonpersonal@gmail.com>  
Sent: 09 October 2025 12:14  
To: Rebecca Hume  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June; legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

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**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda  
Oct 9th 2025

---

**Subject:** Confirmation of Service and Rebuttal of Denial – Legal Notice

Dear Ms. Hume, Mr. Fournillier, and Counsel at Howard Kennedy LLP,

I acknowledge receipt of your response dated [insert date], in which you deny that service was effected by **Mr. Martin Walsh** at 1:30 p.m. UK time.

Please note for the record that **lawful and verifiable service did in fact take place** in accordance with international civil procedure and relevant rules governing cross-border service, including the **Hague Service Convention**. Mr. Walsh is a duly retained and qualified independent process server acting under affidavit, and his certificate of service—bearing witness to time, date, and recipients—is being filed contemporaneously with the relevant courts in **Antigua & Barbuda**, as well as within the **High Court of Justice, King’s Bench Division (UK)**.

You are reminded that **denial of receipt does not invalidate lawful service**, especially where service has been executed in good faith, supported by affidavit, and delivered to designated premises and/or named individuals under instruction. Independent verification, including CCTV and delivery logs, will be presented to confirm this.

For avoidance of doubt:

- **Service is complete** as of 1:30 p.m. UK time on the stated date.
- **Supplementary service** and republication will occur in parallel via registered electronic means, including public notice and international filing platforms, to ensure full transparency.
- Your continued refusal to acknowledge lawful service will be noted for judicial consideration and may result in **default determinations** or **adverse procedural findings**.

All materials, including the affidavit of Mr. Walsh and proof of posting, will be **resubmitted and re-served** for your convenience, with copies lodged both with the court registry and the Antigua Office of the Attorney General.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda

From: Alki David <filmonpersonal@gmail.com>  
Sent: 09 October 2025 12:37  
To: Rebecca Hume  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June; legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

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**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda  
**9 October 2025**

---

**Subject:** Final Notice — Confirmation of Service & Imminent Publication

To: Ms. Rebecca Hume, Mr. Ajay Fournillier, and Howard Kennedy LLP

You were **lawfully served**. Your denial is **false**. The certificate of service has been sworn, filed, and verified. Continued obstruction will not be tolerated.

The service documentation will be made public without delay. It will be published across major outlets — **Shockya, TVMix, Gravitas, DeepRoots**, and affiliated **SwissX Network** platforms — and your PR representatives and social media accounts will be directly tagged.

For public record and context, **Shockya** has already featured coverage relevant to your firm:

“Shockya is a pop culture and entertainment news site...” — establishing clear editorial and public documentation of ongoing proceedings.

 <https://www.shockya.com/news/2025/07/25/209049/>

You are formally notified.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda

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Alki David  
Founder & CEO Anakando Ltd.

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The information contained in this message may be privileged. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thanks!

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We note that the alleged certificate of service does not state which process servers Mr. Walsh works for and we can find no details of a Mr Walsh being a process server in London. Please provide Mr. Walsh's contact details by return.

Your faithfully,

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP

t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980

[rebecca.hume@howardkennedy.com](mailto:rebecca.hume@howardkennedy.com)

[Stay in touch](#) 

---

**From:** Alki David <[filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com)>

**Sent:** Wednesday, October 8, 2025 4:31 PM

**To:** Morgan, June <[june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)>

**Cc:** Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)>; Power, Benjamin | He/His <[Benjamin.Power@justice.gov.uk](mailto:Benjamin.Power@justice.gov.uk)>; KB Judges Listing Office <[KBJudgesListingOffice@justice.gov.uk](mailto:KBJudgesListingOffice@justice.gov.uk)>; [legal@swissx.com](mailto:legal@swissx.com); Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)>; Boniswa Dzere <[Boniswa.Dzere@howardkennedy.com](mailto:Boniswa.Dzere@howardkennedy.com)>; [legalaaffairs@ab.gov.ag](mailto:legalaaffairs@ab.gov.ag); [international.justice@cps.gov.uk](mailto:international.justice@cps.gov.uk); [kb.enquiries@justice.gov.uk](mailto:kb.enquiries@justice.gov.uk)

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004 [FSI-FSI.FID4981609]

**Subject:** Accountability for Breach of Standing Judicial Direction – Cotter J Special-Master Order (KB-2025-001991)

---

Dear Ms Morgan,

It is with regret that I must record my serious concern regarding your conduct in the administration of proceedings **KB-2025-001991**.

As you are aware, **Mr Justice Cotter J** issued an order on **25 July 2025** confirming his **continuing supervisory jurisdiction** as *Special Master* and expressly directing, through you, that His Lordship be **“kept in the loop”** with respect to every subsequent listing or application. Despite this, a hearing has now been listed for **9 October 2025 before Mrs Justice Stacey**, without notice, without service of Form N24, and without Cotter J’s authorisation.

Your reply of 8 October 2025—which repeated the instruction to remove your name from circulation—ignores the standing order that you yourself conveyed. By failing to flag or halt this irregular listing, you have **enabled a procedural ambush against a disabled litigant**, in breach of:

- **CPR 1.1 and 3.1** (overriding objective and case-management fairness);
- **PD 23A §§ 2.1–2.3** (requirement of notice and evidence for applications); and
- **Equality Act 2010 ss. 20–21** (failure to make reasonable adjustments).

This conduct amounts to complicity in an **abuse of process** and places the integrity of the King’s Bench Division at risk. I therefore request that you:

1. **Acknowledge** this notice and confirm immediate referral of the issue to **Mr Justice Cotter J**;
2. **Notify the Listing Office** that no further steps should be taken until His Lordship has reviewed the matter; and
3. **Provide written confirmation** of your compliance for the record.

A copy of this email is being forwarded to the **Registrar, the Senior Presiding Judge, and the JCIO** for transparency and accountability.

Yours faithfully,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Founder & CEO – Anakando Ltd.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

No.1 London Bridge London SE1 9BG

[www.howardkennedy.com](http://www.howardkennedy.com)

This communication and any attachments may contain confidential and privileged information. If this email has been sent to you in error you may not disclose its content to anyone else or copy or forward it in any form. Please notify the sender about this error and delete this email.

Howard Kennedy/Howard Kennedy Corporate Services LLP will not change bank details during the course of this matter. If during the course of this matter you receive an email or telephone call purporting to be from us informing you that our bank details have changed, it is likely to be an attempted fraud. Please contact us by telephone to inform us of any such communication.

Howard Kennedy LLP (registered in England and Wales OC361417) is authorised and regulated by the Solicitors Regulation Authority (number 557188). Our registered office is at No.1 London Bridge London SE1 9BG.

Please note this message has been scanned for viruses by Mimecast. However email is not a secure medium. Any reply to this message could be intercepted and read by someone else. Please carefully check all emails purportedly sent by this firm and do not hesitate to telephone us to query the content of emails.

---

From: Rebecca Hume  
Sent: 09 October 2025 14:45  
To: alki@filmon.com  
Cc: Ajay Fournillier; legal@swissx.com; Boniswa Dzere; Alki David; legal@swissx.com  
Subject: RE: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

---

Dear Mr. David,

We acknowledge receipt of your three emails dated today's date timed at 12.10, 12.14 and 12.38 UK time.

We note that despite Ms. Hume, Mr. Fournillier and Howard Kennedy LLP having not received any documents which you allege were served by a Mr. Walsh, you maintain that there is an affidavit of service as well as CCTV and delivery logs evidencing the same (your email timed at 12.14 today). Please provide a copy of the affidavit of service to which you refer together with all evidence of the alleged service including details of where service is alleged to have occurred, confirmation of who Mr. Walsh works for and evidence that he is a process server.

Other than the electronic copies of the form N215 and a document purporting to be a motion in the Antigua proceedings sent by email to us on 8 October 2025 at 23.26 we have not been served with or received any hard copy documents from you

In the circumstances we do not accept any personal service has been effected on Ms. Hume, Mr. Fournillier and this firm and take the allegations that any service has been effected extremely seriously. We reserve all rights.

Yours faithfully

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP  
t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980  
rebecca.hume@howardkennedy.com

[Stay in touch](#) 

---

**From:** Alki David

**Sent:** Thursday, October 9, 2025 12:14 PM

**To:** Rebecca Hume

**Cc:** Ajay Fournillier ; Power, Benjamin | He/His ; KB Judges Listing Office ; Morgan, June ; legal@swissx.com; Boniswa Dzere ; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda  
Oct 9th 2025

---

**Subject:** Confirmation of Service and Rebuttal of Denial – Legal Notice

Dear Ms. Hume, Mr. Fournillier, and Counsel at Howard Kennedy LLP,

I acknowledge receipt of your response dated [insert date], in which you deny that service was effected by **Mr. Martin Walsh** at 1:30 p.m. UK time.

Please note for the record that **lawful and verifiable service did in fact take place** in accordance with international civil procedure and relevant rules governing cross-border service, including the **Hague Service Convention**. Mr. Walsh is a duly retained and qualified independent process server acting under affidavit, and his certificate of service—bearing witness to time, date, and recipients—is being filed contemporaneously with the relevant courts in **Antigua & Barbuda**, as well as within the **High Court of Justice, King’s Bench Division (UK)**.

You are reminded that **denial of receipt does not invalidate lawful service**, especially where service has been executed in good faith, supported by affidavit, and delivered to designated premises and/or named individuals under instruction. Independent verification, including CCTV and delivery logs, will be presented to confirm this.

For avoidance of doubt:

- **Service is complete** as of 1:30 p.m. UK time on the stated date.
- **Supplementary service** and republication will occur in parallel via registered electronic means, including public notice and international filing platforms, to ensure full transparency.
- Your continued refusal to acknowledge lawful service will be noted for judicial consideration and may result in **default determinations** or **adverse procedural findings**.

All materials, including the affidavit of Mr. Walsh and proof of posting, will be **resubmitted and re-served** for your convenience, with copies lodged both with the court registry and the Antigua Office of the Attorney General.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda

From: Ajay Fournillier  
Sent: 10 October 2025 12:38  
To: Alki David; 'alki@filmon.com'; legal@swissx.com  
Cc: Rebecca Hume; Boniswa Dzere  
Subject: SERVICE - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061514.00004 [FSI-FSI.FID4981609]  
Attachments: 2025.10.10 - Order (re hearing on 9.10.25) - Mrs Justice Stacey.pdf

---

Dear Mr David

We enclose, by way of service, the Order of Mrs Justice Stacey dated 9 October 2025.

Pursuant to paragraph 1 of the Order, the hearing of our client's Contempt Application is adjourned to 2pm (UK time) next Thursday, 16 October 2025. Permission has been granted for you to attend the adjourned hearing via video-link.

Yours faithfully

**Howard Kennedy LLP**

**Ajay Fournillier**

Associate | Howard Kennedy LLP

t: +44 (0)20 3755 5639

ajay.fournillier@howardkennedy.com

[Stay in touch](#) 

IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION

BEFORE: MRS JUSTICE STACEY

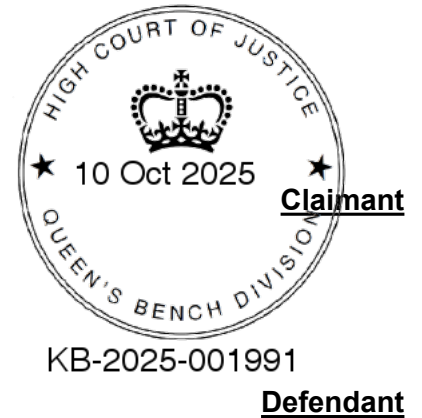
DATE: 9 OCTOBER 2025

BETWEEN:

MAHIM KHAN

-and-

ALKIVIADES DAVID



---

ORDER

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**UPON** hearing the Claimant's adjourned application for an order for contempt dated 23 July 2025 ("**Contempt Application**")

**AND UPON** hearing the Claimant's application dated 15 September 2025 for amendment of the order for substituted service made on 26 June 2025 ("**Service Application**")

**AND UPON** the Defendant on 17 September 2025 by email having nominated service of documents in these proceedings going forward at the email addresses stated at paragraph 2 of this Order

**AND UPON HEARING** Hilary Stonefrost, Counsel for the Claimant

**AND UPON** reading the evidence

**IT IS ORDERED THAT**

1. The Contempt Application be adjourned to 2pm on 16 October 2025 ("**Adjourned Contempt Application Hearing**").

2. The Defendant be permitted to attend the Adjourned Contempt Application Hearing via video-link details of which shall be provided by the court.
3. Paragraph 15 of the order of Mr Justice Calver dated 26 June 2025 be varied to provide that the Claimant's solicitors may effect service of this order and any subsequent orders, applications and any other court documents in these proceedings on the Defendant by email to the Defendant's email addresses [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com), [alki@filon.com](mailto:alki@filon.com), and [legal@swissx.com](mailto:legal@swissx.com) which will be considered good service.
4. Service of the Claimant's application dated 15 September 2025 by email to the Defendant's email addresses [filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com), [alki@filmon.com](mailto:alki@filmon.com), and [alki@filmon.com](mailto:alki@filmon.com) on 15 September 2025 shall be considered good service.
5. Costs of the Contempt Application be reserved.
6. Costs of the Service Application are costs in the cause.

### **Service**

The Court has provided a sealed copy of this Order to the serving party:

Howard Kennedy LLP, No. 1 London Bridge, London, SE1 9BG:  
[rebecca.hume@howardkennedy.com](mailto:rebecca.hume@howardkennedy.com) and [ajay.fournillier@howardkennedy.com](mailto:ajay.fournillier@howardkennedy.com).

From: Alki David <filmonpersonal@gmail.com>

Sent: 11 October 2025 13:53

To: KB Judges Listing Office; Morgan, June Judge Cotter; june.morgan@justice.gov.uk; Power, Benjamin | He/His; legalaffairs@ab.gov.ag; Jenique Joseph; Ajay Fournillier; Rebecca Hume; Jessica Green; Boniswa Dzere; MDD\_BaltimoreClerk@mdd.uscourts.gov; MDD\_GreenbeltClerk@mdd.uscourts.gov

Subject: Claim No.: KB-2025-001991 PROPOSAL FOR JUDICIAL COORDINATION

---

# IN THE HIGH COURT OF JUSTICE

## KING'S BENCH DIVISION

Claim No.: KB-2025-001991

### BETWEEN:

MAHIM KHAN — *Claimant*

and

ALKIVIADES DAVID — *Defendant / Applicant*

---

## PROPOSAL FOR JUDICIAL COORDINATION, SETTLEMENT SUPERVISION & REFERRAL OF SYSTEMIC ABUSE

(Filed pursuant to the directions of Mr Justice Paul Cotter J., July 25 and October 2025)

---

### 1 | INTRODUCTION

1.1 This Proposal invites the Honourable Court to coordinate, with its Antiguan counterpart, supervision of parallel proceedings involving identical parties and facts.

1.2 The Defendant seeks the Court's engagement under **Senior Courts Act 1981 s. 47(1)(a)** and **Articles 6 & 8 ECHR**, ensuring procedural fairness, international comity, and protection of victims of systemic abuse.

---

### 2 | BACKGROUND

2.1 In *Alkiviades David v David Boies et al.* (ANUHCv 2025/0149), the High Court of Antigua and Barbuda entered a **default judgment valued at USD 10 billion**, reflecting evidence of trauma, racketeering, and media suppression.

2.2 Certified service was effected on more than fifty defendants, including corporate and judicial actors within the United Kingdom and United States.

2.3 The Antiguan record includes sworn victim-impact declarations from **Rovier Carrington, Alison Doe, Daniel Kapon Jr., Ashley Parham, and Anita Busch**, supported by exhibits attested by Service Bureau Officers L. Barnes and J. Joseph.

---

### 3 | PURPOSE

This submission requests that the King's Bench Division:

- Recognise the Antiguan judgment for comity purposes;

- Oversee creation of a joint **Judicial Coordination Framework**; and
  - Refer identified criminal conduct for investigation by competent authorities.
- 

## 4 | PROPOSED SETTLEMENT FRAMEWORK

4.1 The Defendant proposes to satisfy the full damages through a structured programme co-supervised by:

- The Courts of the United Kingdom and Antigua & Barbuda;
- A **Three-University Task Force** (initial nominees – Pace Law School / Environmental Justice Program; UCLA School of Law / Health & Ethics Unit; Harvard Berkman-Klein Center / Digital Accountability); and
- Independent auditors KPMG and BDO.

4.2 A **dedicated escrow tranche equivalent to USD 10 billion** — representing the **default judgment already entered by the High Court of Antigua and Barbuda** under *ANUHCV 2025/0149* — shall be constituted and administered under joint audit, with **quarterly reports filed to both registries**. This escrow will serve to honour and operationalise the existing judgment obligations within a mutually supervised settlement framework.

4.3 This judgment-based escrow shall operate within a broader **sovereign-fund-backed settlement architecture** supported by the **SwissX Sovereign Wealth Fund**, whose audited valuation, as set out in the expanded lawsuit and consolidated filings, presently exceeds **USD 800 billion** derived from reef-restoration, biofuel, and climate-sovereignty assets in Antigua & Barbuda.

4.4 This two-tier structure — a **USD 10 billion judgment tranche** anchored within an **USD 800 billion sovereign portfolio** — ensures immediate execution of the Antiguan order while creating a long-term framework for victim reparations and global restorative justice.

---

## 5 | DIPLOMATIC CONSULTATION AND INTERNATIONAL COORDINATION

The Defendant intends to confer with:

- **Hon. Steadroy C.O. Benjamin**, Attorney General;
- **Hon. Gaston Browne**, Prime Minister; and
- **Justice René Williams**, Supreme Court of Antigua & Barbuda,

to formalise an **Inter-Court Memorandum of Understanding** on enforcement and victim protection.

5.1 Following these proceedings, **discussions on U.S. reparations and justice reform have commenced**, involving senior American figures such as **former Congressman Curt Weldon** and members of the **United States Reparations Dialogue Forum**.

5.2 These initiatives reference the Antiguan litigation as a precedent for **sovereign-led reparative frameworks**, linking justice reform, bio-economic restoration, and trauma-compensation principles.

5.3 Recognition of this framework by the King’s Bench Division would reinforce constructive U.S.–Caribbean co-operation and alignment with the United Nations Sustainable Development Goals.

---

## 6 | SYSTEMIC ABUSE AND MEDIA SUPPRESSION

Evidence before the Antiguan Court details how victims were vilified, detained under false “5150-style” holds, or intimidated into silence. Mainstream outlets controlled by defendant media entities suppressed coverage, contrary to the **UN Convention Against Corruption Arts 23–25** and the **UN Basic Principles for Victims (1985)**.

---

## 7 | LEGAL BASIS FOR COORDINATION

- **Judicature (High Court) Act 1959 (ANU)** s. 16
  - **Senior Courts Act 1981 (UK)** ss. 47–49
  - **Mutual Legal Assistance Treaty (UK–Antigua & Barbuda)** Art. 3
- 

## 8 | CRIMINAL MISCONDUCT AND REFERRAL

8.1 Sworn statements identify **Dr Eric Wexler** and staff at **UCLA Medical Center** as misusing psychiatric “5150-style” holds to extort settlements or control witnesses.

8.2 If proven, these acts constitute:

- *False Imprisonment* (Criminal Code Cap 143 s. 255 – ANU; Mental Health Act 1983 s. 129 – UK);
- *Blackmail / Extortion* (Criminal Code s. 295 – ANU; Theft Act 1968 s. 21 – UK); and
- *Conspiracy to Pervert the Course of Justice* (Criminal Code s. 346 – ANU; Perjury Act 1911 – UK).

8.3 The Defendant, acknowledging the presumption of innocence, requests an **Independent Commission of Inquiry** under Mutual Legal Assistance procedures.

---

## 9 | FUNDING TRANSPARENCY AND OVERSIGHT

All SwissX Sovereign Wealth Fund contributions shall be held in trust, verified under IFRS by the Financial Services Regulatory Commission (Antigua), and reported to the UK Financial Conduct Authority for cross-border compliance.

---

## 10 | VICTIM-PROTECTION IMPERATIVE

Under the **UN Declaration of Basic Principles of Justice for Victims of Crime (1985)** and **Council of Europe Recommendation R(85)11**, the Court is urged to guarantee to all affected persons:

- Confidential rehabilitation and support;
  - Correction of defamatory records; and
  - Protection from retaliation and secondary trauma.
- 

## 11 | REQUEST FOR ORDERS

The Defendant respectfully prays that this Honourable Court:

1. Acknowledge the Antiguan default judgment and evidence record;
2. Notify the Supreme Court of Antigua & Barbuda for reciprocal coordination;
3. Endorse creation of the Tri-University Task Force and audit mechanism;
4. Refer allegations of 5150-related abuse to the CPS, DPP (Antigua), and U.S. DOJ OIA;

5. Take judicial notice of the emerging U.S. reparations discussions and invite amicus submissions from academic and governmental observers; and
  6. List this Proposal for mention before Cotter J. within 14 days for directions.
- 

## 12 | STATEMENT OF TRUTH

I believe the facts stated in this Proposal are true to the best of my knowledge and belief.

Signed at St John's, Antigua & Barbuda, this 11 day of October 2025.

**Digitally Signed:** H.E. Alkiviades David  
Ambassador-at-Large for the Green Economy  
SwissX Sovereign Wealth Fund – Antigua & Barbuda  
Defendant / Applicant (KB-2025-001991)

From: Alki David <filmonpersonal@gmail.com>  
Sent: 13 October 2025 12:34  
To: KB Judges Listing Office; Power, Benjamin | He/His; chiefclerk.kb@justice.gov.uk; Morgan, June  
Judge Cotter; june.morgan@justice.gov.uk; Ajay Fournillier; Boniswa Dzere; Jessica Green; Rebecca  
Hume; legalaffairs@ab.gov.ag  
Subject: Re: Claim No. KB-2025-001991 – Filed in Advance of Hearing on 16 October 2025 (Video  
Appearance)

---

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**To:**  
The Honourable Mrs. Justice Stacey  
High Court of Justice  
King’s Bench Division  
Royal Courts of Justice  
Strand, London WC2A 2LL

**Re: Claim No. KB-2025-001991 – Mahim Khan v. Alkiviades David**  
**Notice of Service Confirmation on Howard Kennedy LLP and Parallel Proceedings**  
**Filed in Advance of Hearing on 16 October 2025 (Video Appearance)**

**Your Ladyship,**

I respectfully write in advance of the hearing scheduled for **Thursday, 16 October 2025 at 2:00 p.m.**, at which I shall appear by **remote video link from Antigua and Barbuda**, consistent with the disability accommodations ordered by **Mr Justice Cotter J** on **25 July 2025**.

This correspondence is filed for the record to clarify the procedural standing of this matter and the interrelationship between proceedings in **Antigua**, the **United States**, and this **Honourable Court**.

---

## **1. Confirmed Service on Howard Kennedy LLP**

Contrary to their recent assertions, **Howard Kennedy LLP**, together with **Rebecca Hume** and **Ajay Fournillier**, were **personally served** at **1 London Bridge, London SE1 9BG**, on **8 October 2025 at 13:30 hours**, as evidenced by the **N215 Certificate of Service** filed with the **High Court of Justice – Antigua and Barbuda** (Claim No. ANUHCV2025/0149) and executed by **Mark Walsh, Process Server**.

That certificate confirms delivery of the **Claim Form, Exhibits, and QR-coded Particulars of Claim**, establishing that service was lawfully perfected in accordance with **CPR Part 6**.

Despite this, Howard Kennedy continues to represent to this Court that they have not been properly served. This mischaracterization, when taken alongside their active participation in related matters, amounts to a **continuing abuse of process** and deliberate obstruction of fair proceedings.

---

## **2. Related California Proceedings – The \$900 Million Judgment**

In the **Superior Court of California, Los Angeles County (Case No. 20STCV37498, Jane Doe v. Alkiviades David)**, a **\$900,000,000** judgment was entered in the Defendant’s absence — a verdict obtained without counsel, without a court reporter, and without authenticated evidence or exhibits.

My current U.S. counsel, **Bohm Wildish & Matsen LLP**, has filed oppositions and supporting declarations in that matter (dated **10 October 2025**) establishing that the judgment is legally defective and presently under appellate review.

Those filings document how the same group of opposing attorneys — **Gary A. Dordick, Ebby S. Bakhtiar, Dustin Moaven**, and their affiliates — have continued to coordinate discovery efforts post-judgment, mirroring the procedural misconduct now echoed by **Howard Kennedy LLP** in this jurisdiction.

Accordingly, the California, UK, and Antigua proceedings involve **identical factual matrices, overlapping respondents, and the same counsel networks**, forming a demonstrable transnational pattern of abuse and concealment.

---

### 3. Antigua Proceedings and Legislative Context

The **Eastern Caribbean Supreme Court (High Court of Justice – Antigua & Barbuda)** is seized of *Alkiviades David v. David Boies et al.* (Claim No. ANUHCV2025/0149). That case names **Howard Kennedy LLP** as co-respondents and integrates Antigua’s newly enacted *Carbon Compliance Market Act (2025)*, a statute that enshrines the nation’s sovereign right to generate, verify, and trade carbon credits under **Article 6 of the Paris Agreement**.

This Act forms part of Antigua’s lawful strategy to strengthen national independence through environmental finance — the same independence now threatened by these coordinated transnational legal pressures.

The Government of Antigua and Barbuda has also received formal expressions of participation from **Dr. Denzil Douglas**, the **Ministry of Foreign Affairs**, and the **Ministry of Agriculture of St. Kitts & Nevis**, confirming that the *Carbon Compliance Market* will extend regionally under the OECS framework.

---

### 4. Request for Judicial Notice

In light of these facts, I respectfully request that this letter be entered into the record for the 16 October 2025 hearing and that the Court take **judicial notice** that:

- Howard Kennedy LLP have **been duly served** and are aware of all proceedings in Antigua and the United States;
  - Their continued denial of service is **unsupported by evidence** and contrary to the filed record;
  - The underlying litigation spans multiple jurisdictions, involving **the same parties and counsel**, warranting close judicial coordination to prevent duplicative or abusive litigation; and
  - The Defendant remains a **disabled litigant appearing pro se**, entitled to procedural protections and reasonable accommodations.
- 

Your Ladyship’s attention to these matters will ensure that the upcoming hearing proceeds with full awareness of the factual and procedural context surrounding this complex network of cases.

With the highest respect,

**Yours faithfully,**

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Chairman, SwissX Sovereign Wealth Fund



From: Rebecca Hume  
Sent: 14 October 2025 11:23  
To: alki@filmon.com  
Cc: Ajay Fournillier; Boniswa Dzere; Alki David; legal@swissx.com  
Subject: RE: Claim No. KB-2025-001991 – Filed in Advance of Hearing on 16 October 2025 (Video Appearance)  
Attachments: RE Listing Details - Hearing 09\_10\_25 - KB-2025-001991 - Mahim Khan v Alki David - our ref 061414.00004.msg; N215.Howard Kennedy.pdf

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Dear Mr. David,

We refer to you email below. We have removed the various court emails from the response because it is inappropriate to copy correspondence between the parties to the court. However, we will ensure that a copy of this email together with your email below and the prior correspondence regarding alleged service is before the Judge at the hearing on Thursday 16 October 2025 at 2pm.

We refer to our attached email sent on 9 October 2025 at 14.45 UK time to which we have not received a response.

None of Ms. Hume, Mr. Fournillier and Howard Kennedy LLP were served personally with any proceedings at 1.30pm on 8 October 2025. The only documents they have received are those attached to your email dated 8 October 2025 timed at 23.26 UK time, which are a document called "Consolidate Motion" and the certificate of service. In the circumstances your continued allegation that they have been personally served is not accepted and unsubstantiated.

The only evidence of alleged service is the attached certificate of service which you provided and which on its own is not evidence of service. We note that despite our request for copies of the affidavit of service together with copies of the CCTV and delivery logs to which you refer in your email dated 9 October 2025 timed at 12.14pm UK time, together with confirmation of who Mr. Walsh works for and evidence that he is a process server as we note the certificate of service purports to be signed by him instead of you, be provided by return you have failed to provide copies.

We assume your failure to provide copies of these documents is because they do not exist because personal service has not been affected as alleged.

We take your unsubstantiated allegation regarding personal service extremely seriously and Ms. Hume, Mr. Fournillier and this firm fully reserve all rights in respect of your allegation.

Yours faithfully

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP

t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980

rebecca.hume@howardkennedy.com

[Stay in touch](#) 

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**From:** Alki David

**Sent:** Monday, October 13, 2025 12:34 PM

**To:** KB Judges Listing Office ; Power, Benjamin | He/His ; chiefclerk.kb@justice.gov.uk; Morgan, June Judge Cotter ; june.morgan@justice.gov.uk; Ajay Fournillier ; Boniswa Dzere ; Jessica Green ; Rebecca Hume ; legalaffairs@ab.gov.ag

**Subject:** Re: Claim No. KB-2025-001991 – Filed in Advance of Hearing on 16 October 2025 (Video Appearance)

---

**To:**  
The Honourable Mrs. Justice Stacey

High Court of Justice  
King's Bench Division  
Royal Courts of Justice  
Strand, London WC2A 2LL

**Re: Claim No. KB-2025-001991 – Mahim Khan v. Alkiviades David**  
**Notice of Service Confirmation on Howard Kennedy LLP and Parallel Proceedings**  
**Filed in Advance of Hearing on 16 October 2025 (Video Appearance)**

Your Ladyship,

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This correspondence is filed for the record to clarify the procedural standing of this matter and the interrelationship between proceedings in **Antigua**, the **United States**, and this **Honourable Court**.

---

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Contrary to their recent assertions, **Howard Kennedy LLP**, together with **Rebecca Hume** and **Ajay Fournillier**, were **personally served** at **1 London Bridge, London SE1 9BG**, on **8 October 2025 at 13:30 hours**, as evidenced by the **N215 Certificate of Service** filed with the **High Court of Justice – Antigua and Barbuda** (Claim No. ANUHCV2025/0149) and executed by **Mark Walsh, Process Server**.

That certificate confirms delivery of the **Claim Form, Exhibits, and QR-coded Particulars of Claim**, establishing that service was lawfully perfected in accordance with **CPR Part 6**.

Despite this, Howard Kennedy continues to represent to this Court that they have not been properly served. This mischaracterization, when taken alongside their active participation in related matters, amounts to a **continuing abuse of process** and deliberate obstruction of fair proceedings.

---

### **2. Related California Proceedings – The \$900 Million Judgment**

In the **Superior Court of California, Los Angeles County (Case No. 20STCV37498, Jane Doe v. Alkiviades David)**, a **\$900,000,000** judgment was entered in the Defendant's absence — a verdict obtained without counsel, without a court reporter, and without authenticated evidence or exhibits.

My current U.S. counsel, **Bohm Wildish & Matsen LLP**, has filed oppositions and supporting declarations in that matter (dated **10 October 2025**) establishing that the judgment is legally defective and presently under appellate review.

Those filings document how the same group of opposing attorneys — **Gary A. Dordick, Ebby S. Bakhtiar, Dustin Moaven**, and their affiliates — have continued to coordinate discovery efforts post-judgment, mirroring the procedural misconduct now echoed by **Howard Kennedy LLP** in this jurisdiction.

Accordingly, the California, UK, and Antigua proceedings involve **identical factual matrices, overlapping respondents, and the same counsel networks**, forming a demonstrable transnational pattern of abuse and concealment.

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### **3. Antigua Proceedings and Legislative Context**

The **Eastern Caribbean Supreme Court (High Court of Justice – Antigua & Barbuda)** is seized of ***Alkiviades David v. David Boies et al.*** (Claim No. ANUHCV2025/0149). That case names **Howard Kennedy LLP** as co-respondents and integrates Antigua’s newly enacted ***Carbon Compliance Market Act (2025)***, a statute that enshrines the nation’s sovereign right to generate, verify, and trade carbon credits under **Article 6 of the Paris Agreement**.

This Act forms part of Antigua’s lawful strategy to strengthen national independence through environmental finance — the same independence now threatened by these coordinated transnational legal pressures.

The Government of Antigua and Barbuda has also received formal expressions of participation from **Dr. Denzil Douglas**, the **Ministry of Foreign Affairs**, and the **Ministry of Agriculture of St. Kitts & Nevis**, confirming that the *Carbon Compliance Market* will extend regionally under the OECS framework.

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#### 4. Request for Judicial Notice

In light of these facts, I respectfully request that this letter be entered into the record for the 16 October 2025 hearing and that the Court take **judicial notice** that:

- Howard Kennedy LLP have **been duly served** and are aware of all proceedings in Antigua and the United States;
  - Their continued denial of service is **unsupported by evidence** and contrary to the filed record;
  - The underlying litigation spans multiple jurisdictions, involving **the same parties and counsel**, warranting close judicial coordination to prevent duplicative or abusive litigation; and
  - The Defendant remains a **disabled litigant appearing pro se**, entitled to procedural protections and reasonable accommodations.
- 

Your Ladyship’s attention to these matters will ensure that the upcoming hearing proceeds with full awareness of the factual and procedural context surrounding this complex network of cases.

With the highest respect,

**Yours faithfully,**  
**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Chairman, SwissX Sovereign Wealth Fund

Defendant / Applicant

8 October 2025

---

# Certificate of service

<b>Name of court</b> High Court of Justice – Antigua and Barbuda	<b>Claim No.</b> ANUHCV2025/0149
<b>Name of Claimant</b> Alkiviades David	
<b>Name of Defendant</b> (1) Rebecca Hume, (2) Ajay Fournillier, (3) Howard Kennedy LLP	

**On what day did you serve?** 0 8 / 1 0 / 2 0 2 5

**The date of service is** 0 8 / 1 0 / 2 0 2 5

## What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Claim Form and exhibits 2. Particulars of Claim QR Code - ANUHCV2025/0149

## On whom did you serve?

(If appropriate include their position e.g. partner, director).

(1)Rebecca Hume, (2) Ajay Fournillier,(3)Howard Kennedy LLP

## How did you serve the documents?

(please tick the appropriate box)

by first class post or other service which provides for delivery on the next business day

by delivering to or leaving at a permitted place

by personally handing it to or leaving it with  
(..13:30.....time left, where document is other than a claim form) (please specify)

by other means permitted by the court  
(please specify)

by Document Exchange

by fax machine (.....time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

by other electronic means (.....time sent, where document is other than a claim form) (please specify)

## Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

1 London Bridge, London SE1 9BG

**Being the**  claimant's  defendant's  
 solicitor's  litigation friend

usual residence

last known residence

place of business

principal place of business

last known place of business

last known principal place of business

principal office of the partnership

principal office of the corporation

principal office of the company

place of business of the partnership/company/  
corporation within the jurisdiction with a connection to claim

other (please specify)

## I believe that the facts stated in this certificate are true.

Full name Mark Walsh

Signed *Mark Walsh*

(Claimant) (Defendant) (solicitor) (litigation friend)

Position or office held Process Server

(If signing on behalf of firm or company)

Date 0 8 / 1 0 / 2 0 2 5

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

### Calculation of deemed day of service of a claim

A claim form served within the UK in accordance with Part 6 of the Civil Procedure rules is deemed to be served on the second business day after the claimant has completed the steps required by CPR 7.5(1).

### Calculation of the deemed day of service of documents other than the claim form (CPR 6.26)

Method of service	Deemed day of service
First class post or other service which provides for delivery on the next business day	The second day after it was posted, left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Document exchange	The second day after it was left with, delivered to or collected by the relevant service provider provided that day is a business day; or if not, the next business day after that day
Delivering the document to or leaving it at a permitted address	If it is delivered to or left at the permitted address on a business day before 4.30pm, on that day; or in any other case, on the next business day after that day
Fax	If the transmission of the fax is completed on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was transmitted
Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
Personal service	If the document is served personally before 4.30pm on a business day, it is served on that day; or in any other case, on the next business day after that day

In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

From: Rebecca Hume  
Sent: 09 October 2025 14:45  
To: alki@filmon.com  
Cc: Ajay Fournillier; legal@swissx.com; Boniswa Dzere; Alki David; legal@swissx.com  
Subject: RE: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

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Dear Mr. David,

We acknowledge receipt of your three emails dated today's date timed at 12.10, 12.14 and 12.38 UK time.

We note that despite Ms. Hume, Mr. Fournillier and Howard Kennedy LLP having not received any documents which you allege were served by a Mr. Walsh, you maintain that there is an affidavit of service as well as CCTV and delivery logs evidencing the same (your email timed at 12.14 today). Please provide a copy of the affidavit of service to which you refer together with all evidence of the alleged service including details of where service is alleged to have occurred, confirmation of who Mr. Walsh works for and evidence that he is a process server.

Other than the electronic copies of the form N215 and a document purporting to be a motion in the Antigua proceedings sent by email to us on 8 October 2025 at 23.26 we have not been served with or received any hard copy documents from you

In the circumstances we do not accept any personal service has been effected on Ms. Hume, Mr. Fournillier and this firm and take the allegations that any service has been effected extremely seriously. We reserve all rights.

Yours faithfully

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP  
t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980  
rebecca.hume@howardkennedy.com

[Stay in touch](#) 

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**From:** Alki David

**Sent:** Thursday, October 9, 2025 12:14 PM

**To:** Rebecca Hume

**Cc:** Ajay Fournillier ; Power, Benjamin | He/His ; KB Judges Listing Office ; Morgan, June ; legal@swissx.com; Boniswa Dzere ; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda  
Oct 9th 2025

---

**Subject:** Confirmation of Service and Rebuttal of Denial – Legal Notice

Dear Ms. Hume, Mr. Fournillier, and Counsel at Howard Kennedy LLP,

I acknowledge receipt of your response dated [insert date], in which you deny that service was effected by **Mr. Martin Walsh** at 1:30 p.m. UK time.

Please note for the record that **lawful and verifiable service did in fact take place** in accordance with international civil procedure and relevant rules governing cross-border service, including the **Hague Service Convention**. Mr. Walsh is a duly retained and qualified independent process server acting under affidavit, and his certificate of service—bearing witness to time, date, and recipients—is being filed contemporaneously with the relevant courts in **Antigua & Barbuda**, as well as within the **High Court of Justice, King's Bench Division (UK)**.

You are reminded that **denial of receipt does not invalidate lawful service**, especially where service has been executed in good faith, supported by affidavit, and delivered to designated premises and/or named individuals under instruction. Independent verification, including CCTV and delivery logs, will be presented to confirm this.

For avoidance of doubt:

- **Service is complete** as of 1:30 p.m. UK time on the stated date.
- **Supplementary service** and republication will occur in parallel via registered electronic means, including public notice and international filing platforms, to ensure full transparency.
- Your continued refusal to acknowledge lawful service will be noted for judicial consideration and may result in **default determinations** or **adverse procedural findings**.

All materials, including the affidavit of Mr. Walsh and proof of posting, will be **resubmitted and re-served** for your convenience, with copies lodged both with the court registry and the Antigua Office of the Attorney General.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda

From: Alki David <filmonpersonal@gmail.com>  
Sent: 14 October 2025 13:31  
To: KB Judges Listing Office; Power, Benjamin | He/His; Morgan, June Judge Cotter; chiefclerk.kb@justice.gov.uk  
Cc: Ajay Fournillier; Boniswa Dzere; legal@swissx.com; legalaffairs@ab.gov.ag; Jenique Joseph  
Subject: Re: Claim No. KB-2025-001991 – Filed in Advance of Hearing on 16 October 2025 (Video Appearance)  
Attachments: EXHIBIT A N215.Howard Kennedy-1.pdf; EXHIBIT B 2025.10.10 [signed] CP Decl ISO Oppo to PLTs MTC (SROGS) w exh.pdf; EXHIBIT C - Claim Form (6)-5.pdf

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## Letter to The Honourable Mrs. Justice Stacey

High Court of Justice – King’s Bench Division  
Royal Courts of Justice, Strand, London WC2A 2LL  
Filed in Advance of Hearing on 16 October 2025 (Video Appearance)

Re: *Mahim Khan v. Alkiviades David* – Claim No. KB-2025-001991  
Notice of Service Confirmation on Howard Kennedy LLP and Parallel Proceedings

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Your Ladyship,

I respectfully write in advance of the hearing scheduled for **Thursday, 16 October 2025 at 2:00 p.m.**, at which I shall appear by **remote video link from Antigua and Barbuda**, consistent with the disability accommodations ordered by **Mr Justice Cotter J** on **25 July 2025**.

This correspondence is filed for the record to clarify the procedural standing of this matter and the interrelationship between proceedings in **Antigua**, the **United States**, and this **Honourable Court**.

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### 1. Confirmed Service on Howard Kennedy LLP

Contrary to their recent assertions, **Howard Kennedy LLP**, together with **Rebecca Hume** and **Ajay Fournillier**, were **personally served** at **1 London Bridge, London SE1 9BG** on **8 October 2025 at 13:30 hours**, as evidenced by the **N215 Certificate of Service** filed with the **High Court of Justice – Antigua and Barbuda** (Claim No. ANUHCV2025/0149) and executed by **Mark Walsh**, a recognised and licensed **professional process server**.

That certificate confirms delivery of the **Claim Form, Exhibits, and QR-coded Particulars of Claim**. Despite this, Howard Kennedy continues to represent to this Court that they have not been properly served. This mischaracterisation, when taken alongside their active participation in related matters, amounts to a **continuing abuse of process** and deliberate obstruction of fair proceedings.

---

### 2. Related California Proceedings – The \$900 Million Judgment

In the **Superior Court of California, Los Angeles County (Case No. 20STCV37498, *Jane Doe v. Alkiviades David*)**, a **\$900,000,000** judgment was entered in the Defendant’s absence — a verdict obtained without counsel, without a court reporter, and without authenticated evidence or exhibits.

My current U.S. counsel, **Bohm Wildish & Matsen LLP**, has filed oppositions and declarations (dated **10 October 2025**) establishing that the judgment is defective and under appellate review.

The California, UK, and Antigua proceedings involve **identical parties and overlapping counsel**, forming a clear transnational pattern of misconduct.

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### 3. Antigua Proceedings and Legislative Context

The **Eastern Caribbean Supreme Court (High Court of Justice – Antigua & Barbuda)** is seized of *Alkiviades David v. David Boies et al.* (Claim No. ANUHCV2025/0149). That case names **Howard Kennedy LLP** as co-respondents and integrates Antigua’s newly enacted **Carbon Compliance Market Act (2025)**, enshrining the nation’s sovereign right to generate and trade carbon credits under **Article 6 of the Paris Agreement**.

This Act reinforces Antigua’s financial independence and resistance to external coercion.

The Governments of **Antigua & Barbuda** and **St. Kitts & Nevis** (via **Dr. Denzil Douglas**, the Ministries of Foreign Affairs and Agriculture) have jointly affirmed participation in this regional climate-finance platform under the OECS framework.

The Defendant further notes that the **Eastern Caribbean Supreme Court (ECSC)**, presided over by **The Honourable Justice René Williams**, is presently finalising a **default judgment valued at USD 10 billion** in *Alkiviades David v. David Boies et al.* (Claim No. ANUHCV2025/0149).

This forthcoming order arises from the defendants’ repeated failures to appear or respond to properly served pleadings, thereby confirming recognition of the Defendant’s underlying claims and damages.

The judgment is directly relevant to the present matter before this Honourable Court, as it involves the same nexus of parties and conduct under examination in London.

The **official ECSC filing record** and claim form may be viewed through the Antigua & Barbuda Government’s secured OneDrive portal at the following link:

[\[my.sharepoint.com/personal/jenique\\\_joseph\\\_ab\\\_gov\\\_ag/\\\_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fjenique%5Fjoseph%5Fab%5Fgov%5Fag%2FDocuments%2FAttachments%2FClaim%20Form%20%286%29%2Epdf&parent=%2Fpersonal%2Fjenique%5Fjoseph%5Fab%5Fgov%5Fag%2FDocuments%2FAttachments&ga=1\]\(https://anubar-my.sharepoint.com/personal/jenique\_joseph\_ab\_gov\_ag/\_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fjenique%5Fjoseph%5Fab%5Fgov%5Fag%2FDocuments%2FAttachments%2FClaim%20Form%20%286%29%2Epdf&parent=%2Fpersonal%2Fjenique%5Fjoseph%5Fab%5Fgov%5Fag%2FDocuments%2FAttachments&ga=1\)](https://anubar-</a></p></div><div data-bbox=)

For completeness, the Defendant encloses a consolidated exhibit bundle titled “*Exhibit – Bohm Wildish & Matsen Filings (California \$900 Million Judgment Appeal)*”, containing:

- **Exhibit A:** N215 Howard Kennedy
- **Exhibit B:** Declaration ISO Opposition (with exhibits) filed 10 Oct 2025
- **EXHIBIT C:** Claim Form Antigua ECSC Filed complaint

These materials are tendered solely to assist the Court’s understanding of the broader factual nexus and ensure consistency across jurisdictions.

---

**With the highest respect,**

**Yours faithfully,**

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)

Chairman, SwissX Sovereign Wealth Fund

Defendant / Applicant

14th October 2025

---

**Case Number : ANUHCV2025/0149**

**IN THE HIGH COURT OF JUSTICE**

**ANTIGUA AND BARBUDA**

**Claim No: [To be assigned by Registry]**

**BETWEEN:**

**ALKIVIADES DAVID**

*of SwissX Island, St. John's, Antigua & Barbuda*

**Claimant**

— AND —

1. **DAVID BOIES**, of Boies Schiller Flexner LLP
2. **GLORIA ALLRED**, of Allred, Maroko & Goldberg
3. **DANI PERETZ**, of Geneva, Switzerland & Tel Aviv, Israel
4. **SHARI REDSTONE**, of Paramount Global, and Caribbean Holdings
5. **DAPHNE BARAK**, of Beverly Hills, California and Tel Aviv, Israel
6. **MICHAEL AVENATTI**, formerly of Eagan Avenatti LLP
7. **TOM GIRARDI**, incarcerated at Federal Medical Center, Butner, North Carolina, USA
8. **BLACK CUBE LTD**, an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel
9. **LIMEWIRE NFT HOLDINGS**, with assets and servers in the Caribbean
10. **EDGAR BRONFMAN SR. (Deceased)**, estate with real property in St. Barthélemy
11. **JOHN BRANCA**, of West Hollywood and Jumby Bay, Antigua
12. **JOHN MCCLAIN**, music executive, of Los Angeles and Bahamas
13. **THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP)**, Antigua & Barbuda
14. **And DOES 1–100**

**Defendants**

STATEMENT OF CLAIM

**1. Parties**

The Claimant, Alkiviades David (“Claimant”), is a dual-national entrepreneur, human rights advocate, and founder of SwissX, operating a sovereign wealth initiative and biofuel enterprise in St. John’s, Antigua & Barbuda.



**Submitted Date: 17/04/2025 13:21**

**Filed Date: 17/04/2025 13:21**

**Fees Paid: 52.00**

The Defendants, named and unknown, comprise a transnational syndicate of attorneys, intelligence agents, entertainment executives, political operatives, and private contractors who, acting in concert, have conducted a coordinated campaign of harassment, fraud, extortion, and racketeering against the Claimant. Many Defendants maintain residences, hold offshore accounts, and/or possess tangible and intellectual assets within the jurisdiction of Antigua & Barbuda or other Caribbean states including the Bahamas, St. Kitts & Nevis, Barbados, and St. Barthélemy.

## 2. Jurisdiction

This Honourable Court has **personal and subject-matter jurisdiction** under the laws of Antigua & Barbuda and the ECSC Civil Procedure Rules (Revised 2023), specifically where:

- Assets of the Defendants exist within Antigua & Barbuda (including real estate and bank accounts),
- Defendants have done business and committed tortious acts within the jurisdiction, and
- The harm suffered by the Claimant has had substantial effects locally, including reputational and economic damages impacting SwissX and its sovereign partnerships.

## 3. Factual Background

Between 2016 and 2025, the Defendants, jointly and severally, have:

- Filed and orchestrated **fraudulent lawsuits** across multiple jurisdictions including California, New York, and Europe, some of which have been **set aside or reversed** for procedural violations.
- Engaged in **conspiracy to defraud**, by fabricating witnesses, withholding exculpatory evidence, and tampering with court records and legal representatives.
- Directed **cyber and physical surveillance** operations using assets like Black Cube and Media Defender, targeting Claimant's businesses, legal advisors, and personal contacts.
- Illegally trafficked and monetized private data, music content, and intellectual property derived from the Claimant and Michael Jackson's estate via LimeWire and related platforms.
- Spread **false and defamatory narratives** in the international press and legal forums, harming the Claimant's reputation, interfering with government contracts, and deterring sovereign partners.

Notably, properties connected to the Defendants in **Jumby Bay, St. John's, Barbados**, and the **Bahamas** serve as conduits for laundering money, storing IP, and operating intelligence networks.

#### 4. Causes of Action

The Claimant brings this action under the common law and statutory principles of:

- **Conspiracy to injure**
- **Fraudulent misrepresentation**
- **Economic tort (unlawful interference with business)**
- **Defamation**
- **Breach of international and local fiduciary duties**
- **Conversion of intellectual property**
- **Tortious abuse of process**
- **Civil conspiracy**

#### 5. Relief Sought

The Claimant respectfully seeks:

- **General Damages** in the amount of **\$10,000,000,000.00 USD**, reflecting the magnitude of economic harm, reputational loss, and mental anguish.
- **Special Damages**, including loss of sovereign contracts, devaluation of intellectual property, and missed investment milestones.
- **Injunctive Relief**, restraining Defendants from further harassment, publication, or litigation relating to the matters herein.
- **Tracing and Recovery** of assets held in Caribbean jurisdictions under shell corporations or in trust.
- **Order for Disclosure** of all communications, financial documents, and related materials regarding Claimant.
- **Costs** of this proceeding.
- **Any further relief** this Honourable Court deems just and expedient.

#### 6. Verification

I, **Alkiviades David**, being the Claimant herein, affirm that the facts stated in this Statement of Claim are true to the best of my knowledge, information, and belief.

DATED this 17 day of April 2025.

  
\_\_\_\_\_  
COMMISSIONER FOR OATH  
ANTIGUA & BARBUDA

**Alkiviades David, Claimant**

*SwissX Island, St. John's, Antigua & Barbuda*

**Email:** [ceo@swissx.com](mailto:ceo@swissx.com)

**Phone:** +1 (268) 780-4133

# Certificate of service

<b>Name of court</b> High Court of Justice – Antigua and Barbuda	<b>Claim No.</b> ANUHCV2025/0149
<b>Name of Claimant</b> Alkiviades David	
<b>Name of Defendant</b> (1) Rebecca Hume, (2) Ajay Fournillier, (3) Howard Kennedy LLP	

**On what day did you serve?** 0 8 / 1 0 / 2 0 2 5

**The date of service is** 0 8 / 1 0 / 2 0 2 5

## What documents did you serve?

Please attach copies of the documents you have not already filed with the court.

1. Claim Form and exhibits 2. Particulars of Claim QR Code - ANUHCV2025/0149

## On whom did you serve?

(If appropriate include their position e.g. partner, director).

(1)Rebecca Hume, (2) Ajay Fournillier,(3)Howard Kennedy LLP

## How did you serve the documents?

(please tick the appropriate box)

- by first class post or other service which provides for delivery on the next business day
- by delivering to or leaving at a permitted place
- by personally handing it to or leaving it with  
(..13:30.....time left, where document is other than a claim form) (please specify)
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- by other electronic means (.....time sent, where document is other than a claim form) (please specify)

## Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

1 London Bridge, London SE1 9BG

- Being the**  claimant's  defendant's  
 solicitor's  litigation friend
- usual residence
- last known residence
- place of business
- principal place of business
- last known place of business
- last known principal place of business
- principal office of the partnership
- principal office of the corporation
- principal office of the company
- place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
- other (please specify)

## I believe that the facts stated in this certificate are true.

Full name Mark Walsh

Signed *Mark Walsh* Position or office held Process Server

(Claimant) (Defendant) (solicitor) (litigation friend)

(If signing on behalf of firm or company)

Date 0 8 / 1 0 / 2 0 2 5

Rules relating to the service of documents are contained in Part 6 of the Civil Procedure Rules ([www.justice.gov.uk](http://www.justice.gov.uk)) and you should refer to the rules for information.

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Other electronic method	If the email or other electronic transmission is sent on a business day before 4.30pm, on that day; or in any other case, on the next business day after the day on which it was sent
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In this context 'business day' means any day except Saturday, Sunday or a bank holiday; (under the Banking and Financial Dealings Act 1971 in the part of the UK where service is to take place) includes Good Friday and Christmas Day.

1 James G. Bohm, Esq. (SBN 132430)  
[jbohm@bohmwildish.com](mailto:jbohm@bohmwildish.com)  
2 Cecilia Preciado, Esq. (SBN 159309)  
[cpreciado@bohmwildish.com](mailto:cpreciado@bohmwildish.com)  
3 BOHM WILDISH & MATSEN, LLP  
600 Anton Blvd, Suite 640  
4 Costa Mesa, California 92626  
Tel: (714) 384-6500  
5 Fax: (714) 384-6501

6 Attorneys for ALKIVIADES DAVID

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**

9 JANE DOE, an Adult Individual Suing Under  
10 Anonymity Due to Privacy and Safety  
11 **Plaintiff,**

12 v.

13 ALKIVIADES DAVID, an Individual, a.k.a.  
14 ALKI DAVID; HOLOGRAM USA, INC., a  
15 California Corporation, a.k.a. HOLOGRAM  
16 USA PRODUCTIONS, INC., HOLOGRAM  
17 USA ENTERTAINMENT, INC.,  
FILMON.TV, INC., FILMON.TV  
18 NETWORKS, INC. and FILMON.TV LA,  
INC.; SWISSX LABS AG, INC. a California  
19 Corporation, a.k.a. SWISSX LOUNGE and  
FILMONTV UK, LTD; and DOES 1 through  
20 150, inclusive,

21 **Defendants.**

Case No. 20STCV37498  
Assigned to: Hon. Christopher L. Lui  
Dept. 76

**DECLARATION OF CECILIA  
PRECIADO, ESQ. IN SUPPORT OF  
DEFENDANT ALKIVIADES DAVID'S  
OPPOSITION TO PLAINTIFF'S MOTION  
TO COMPEL FURTHER RESPONSES TO  
PLAINTIFF'S JUDGMENT DEBTOR  
SPECIAL INTERROGATORIES, SET ONE**

Date: October 23, 2025  
Time: 8:30 AM  
Dept: 76

Reservation ID: 325064127353



1           10.     The responses were due on August 19, 2025.

2           11.     Plaintiff’s memorandum of points and authorities at page 3 line 21 states that the  
3 responses were due on or before August 19, 2025 and that Defendant did not request an extension  
4 to respond. Similarly, Mr. Moaven declares under penalty of perjury at paragraph 6 of his  
5 declaration in support of the motion to compel further responses to the Demand for Production that  
6 “Defendant never asked for an extension of time to respond to Plaintiff’s RFP.” The same  
7 representations are made in the memorandum of points and authorities regarding the motion to  
8 compel further responses to Special Interrogatories and in Mr. Moaven’s declaration at paragraph 6,  
9 p. 7.

10          12.     It is not true that a request for extension to respond was not requested. Indeed a  
11 request for extension was requested and it was Mr. Moaven, who has declared under penalty of  
12 perjury no extension was requested, the person that responded to me and denied my request. (See  
13 **Exhibits “A”** and **“B”** below.

14          13.     On August 19, 2025, I sought a two-week extension to respond to the discovery up to  
15 and including September 2, 2025. Attached hereto as **Exhibit “A”** is a true and correct copy of my  
16 August 19, 2025 email to Plaintiff’s counsel, Dustin Moaven. I indicated in my email that Mr.  
17 Bohm (lead counsel) and I had been engaged in a 3-week trial and asked if we could please have a  
18 two week extension.

19          14.     My request for a 2-week extension was denied. Attached hereto as **Exhibit “B”** is a  
20 true and correct copy of Mr. Moaven’s August 19, 2025 email to me denying my request for a two-  
21 week extension to respond.

22          15.     My extension request was my first request for extension.

23          16.     In light of the denial of the request for extension, on August 19, 2025 I served timely  
24 objections to the discovery. Attached hereto as **Exhibit “C”** is a true and correct copy of Defendant  
25 Alkiviades David’s Responses to Plaintiff Jane Doe’s Judgment Debtor Requests for Production of  
26 Documents , Set One. Attached hereto as **Exhibit “D”** is a true and correct copy of Defendant  
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1 Alkiviades David’s Response to Plaintiff Jane Doe’s Judgment Debtor Interrogatories to Alkiviades  
2 David Pursuant to Civil Code Section 708.020.

3 17. On September 4, 2025, I received correspondence from Mr. Moaven dated  
4 September 3, 2025. In his correspondence, Mr. Moaven states in part: “Unless defendant serves full,  
5 code-compliant amended responses and produces all responsive documents by the close of business  
6 on September 18, 2025, Plaintiff will have no choice but to move to compel and seek monetary  
7 sanctions pursuant to C.C.P Section 2030.300, 2031.310 and 2023.030.”

8 18. On September 18, 2025, I wrote to Mr. Moaven acknowledging his September 3,  
9 2024 letter. I requested time to address his letter and to meet and confer with him in an effort to  
10 resolve the issues set forth in his September 3, 2025 correspondence. I noted I needed more time to  
11 respond to the meet and confer. I informed Mr. Moaven in exchange, I agree to extend Plaintiff’s  
12 motion to compel deadline the equivalent amount of time.

13 19. I further informed Mr. Moaven that as he is aware from my previous request for  
14 extension to respond to the discovery that my schedule was impacted with a heavy trial schedule.

15 20. I gave Mr. Moaven a detailed explanation of my impacted schedule, including  
16 identifying the dates I had been in trial and other commitments.

17 21. I noted in my September 18, 2025 email that I did not see any prejudice to Plaintiff  
18 by Mr. Moaven granting me additional time to enable us to meet and confer since I was granting an  
19 extension to file a motion to compel should that be necessary, and the case is on appeal and  
20 approaching the briefing schedule. Attached hereto as **Exhibit “E”** is a true and correct copy of  
21 my September 18, 2025 email to Mr. Moaven. I received an out of office reply to the email and  
22 directing me to another attorney in the office, Brittney Ghadoushi. Attached hereto as **Exhibit “F”**  
23 is a true and correct copy of the out of office notification.

24 22. I forwarded the email to attorney Ghadoushi in light of Mr. Moaven’s absence.  
25 Attached hereto as **Exhibit “G”** is a true and correct copy of my email to Ms. Ghadoushi  
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1           23.     My request for extension to respond to the meet and confer was denied without  
2 explanation. Attached hereto as **Exhibit “H”** is a true and correct copy of Ms. Ghadoushi’s email  
3 denying me request for extension.

4           24.     On September 18, 2025 I sent a detailed meet and confer correspondence to Mr.  
5 Moaven and copied Ms. Ghadoushi on the email. In my meet and confer, I addressed the issue of  
6 an extension, asked that they reconsider, and cited them to Guidelines for Civility in Litigation and  
7 the State Bar of California Civility Toolbox encouraging attorneys to grant reasonable extensions. I  
8 also addressed the nature of his September 3, 2025 letter; that fact that it reads more as an  
9 ultimatum with a threat of a motion as opposed to a genuine attempt at a meet and confer. I also  
10 addressed deficiencies in the requests and interrogatories. I asked Mr. Moaven to limit the scope of  
11 the discovery as 25 out of the 35 special interrogatories seek information going back ten years and  
12 31 out of the 35 Demand for Production of Documents requests seek documents going back ten  
13 years. I invited a telephonic meet and confer. Attached hereto as **Exhibit “I”** is a true and correct  
14 copy of my September 18, 2025 meet and confer correspondence to Mr. Moaven with the  
15 transmittal email.

16           25.     I received no response to my meet and confer correspondence. I received no phone  
17 call as I invited to meet and confer.

18           26.     Instead, the very next day I received service of two motions to compel further  
19 responses purportedly signed by Mr. Moaven, even though I received an automatic email response  
20 the day before that he would be out of the office until September 22, 2205. The motion is silent on  
21 the fact that I sent a request for extension on the meet and confer and silent on the fact that I sent a  
22 detailed meet and confer letter to Plaintiff’s counsel.

23 ///

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1           27.     Deficiencies in the Demand for Production and in the Special Interrogatories are set  
2 forth in my September 18, 2025 Meet and Confer Letter.

3           I declare under penalty of perjury that the foregoing is true and correct. Executed on  
4 October 10, 2025 at Costa Mesa, CA 92626.

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7           Cecilia Preciado, Esq.

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# **EXHIBIT “A”**

## Ceci Preciado

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**From:** Ceci Preciado  
**Sent:** Tuesday, August 19, 2025 6:47 AM  
**To:** Gustavo Gonzalez-Ramos  
**Cc:** Dustin Moaven Eservice List  
**Subject:** RE: Jane Doe v. Alki David, et al.

Good morning Dustin.

Mr. Bohm and I have been in a three week trial. Can I please get a two week extension regarding the below referenced discovery up to and including September 2, 2025?

Thank you for your anticipated cooperation in this regard.

---

**From:** Gustavo Gonzalez-Ramos <gustavo.gonzalez@dordicklaw.com>  
**Sent:** Thursday, July 17, 2025 3:28 PM  
**To:** Jim Bohm <jboh@aol.com>; Ceci Preciado <cpreciado@bohmwildish.com>; Cynthia Lopez <clopez@bohmwildish.com>; Jade Doneza <jdoneza@bohmwildish.com>  
**Cc:** Dustin Moaven Eservice List <DZMeservice@dordicklaw.com>  
**Subject:** Jane Doe v. Alki David, et al.

Good afternoon Counsel,

Enclosed, please find the following attachments regarding the above referenced matter:

- **PLAINTIFF JANE DOE'S JUDGMENT DEBTOR INTERROGATORIES TO DEFENDANT ALKIVIADES DAVID PURSUANT TO CODE. CIV. PROC. § 708.020 (SET ONE)**
- **PLAINTIFF JANE DOE'S JUDGMENT DEBTOR REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT ALKIVIADES DAVID (SET ONE)**

Best Regards,

**Gustavo Gonzalez-Ramos**

Paralegal

**DORDICK LAW CORPORATION**  
Beverly Hills • Downtown Los Angeles • Riverside  
Direct/Text (424) 407-4658  
(800) 555-5595 (310) 551-0949  
Fax (424) 407-4658  
[gustavo.gonzalez@dordicklaw.com](mailto:gustavo.gonzalez@dordicklaw.com)  
[www.Dordicklaw.com](http://www.Dordicklaw.com)



# **EXHIBIT “B”**

## Ceci Preciado

---

**From:** Dustin Moaven <dustin@dordicklaw.com>  
**Sent:** Tuesday, August 19, 2025 9:59 AM  
**To:** Ceci Preciado  
**Cc:** Dustin Moaven Eservice List; Gustavo Gonzalez-Ramos  
**Subject:** RE: Jane Doe v. Alki David, et al.  
**Attachments:** Re: FW: Jane Doe v. Alki David, et al.

Good morning,

Please see attached. Unfortunately, given the circumstances we cannot grant an extension.

## Dustin Moaven

Associate Attorney

### DORDICK LAW CORPORATION

Beverly Hills • Downtown Los Angeles • Riverside

Direct/Text (424) 426-6716

(800) 555-5595 (310) 551-0949

Fax (424) 426-6716

[dustin@dordicklaw.com](mailto:dustin@dordicklaw.com)

[www.Dordicklaw.com](http://www.Dordicklaw.com)



All correspondence to: 1122 Wilshire Boulevard, Los Angeles, CA 90017

*This message is privileged, confidential, and intended only for the above-named individual. If you are not the intended recipient, any dissemination, distribution, or copying is strictly prohibited. If you have received this communication in error, please notify the sender.*

---

**From:** Ceci Preciado <cpreciado@bohmwildish.com>  
**Sent:** Tuesday, August 19, 2025 6:47 AM  
**To:** Gustavo Gonzalez-Ramos <gustavo.gonzalez@dordicklaw.com>  
**Cc:** Dustin Moaven Eservice List <DZMeservice@dordicklaw.com>  
**Subject:** RE: Jane Doe v. Alki David, et al.

Good morning Dustin.

Mr. Bohm and I have been in a three week trial. Can I please get a two week extension regarding the below referenced discovery up to and including September 2, 2025?

Thank you for your anticipated cooperation in this regard.

---

**From:** Gustavo Gonzalez-Ramos <gustavo.gonzalez@dordicklaw.com>  
**Sent:** Thursday, July 17, 2025 3:28 PM  
**To:** Jim Bohm <jbohm@aol.com>; Ceci Preciado <cpreciado@bohmwildish.com>; Cynthia Lopez

<clopez@bohmwildish.com>; Jade Doneza <jdoneza@bohmwildish.com>

Cc: Dustin Moaven Eservice List <DZMeservice@dordicklaw.com>

Subject: Jane Doe v. Alki David, et al.

Good afternoon Counsel,

Enclosed, please find the following attachments regarding the above referenced matter:

- **PLAINTIFF JANE DOE'S JUDGMENT DEBTOR INTERROGATORIES TO DEFENDANT ALKIVIADES DAVID PURSUANT TO CODE. CIV. PROC. § 708.020 (SET ONE)**
- **PLAINTIFF JANE DOE'S JUDGMENT DEBTOR REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT ALKIVIADES DAVID (SET ONE)**

Best Regards,

**Gustavo Gonzalez-Ramos**

Paralegal

**DORDICK LAW CORPORATION**

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Direct/Text (424) 407-4658

(800) 555-5595 (310) 551-0949

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[gustavo.gonzalez@dordicklaw.com](mailto:gustavo.gonzalez@dordicklaw.com)

[www.Dordicklaw.com](http://www.Dordicklaw.com)



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## Ceci Preciado

---

**From:** Alki David <filmonpersonal@gmail.com>  
**Sent:** Monday, August 18, 2025 3:39 AM  
**To:** Gary A. Dordick; Sandra Jimenez; gallred@amglaw.com; Dustin Moaven Eservice List; ESB; Dustin Moaven  
**Cc:** Cynthia Lopez; Antonia Leseth; Jim Bohm; benjamin.power@justice.gov.uk; Jenique Joseph; Ceci Preciado  
**Subject:** Re: FW: Jane Doe v. Alki David, et al.

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

### Via E-Mail – For Internal Distribution at Dordick Law Corporation

To: All Attorneys, Associates, and Staff of Dordick Law Corporation  
From: **Alkiviades Andrew David** – Ambassador-at-Large, Green Economy, Antigua & Barbuda

---

### Notice of Liability – Jane Doe Litigation and Related Proceedings

This is a formal notice that **your entire firm, including all employees, associates, and support staff, is now under scrutiny in multiple jurisdictions** as a result of your participation in the fraudulent enforcement of the Jane Doe matter.

- **High Court of Justice, Antigua & Barbuda (Case No. ANUHCV2025/0149):** Your firm’s principals – Gary A. Dordick and Ebby S. Bakhitar – have been personally served and defaulted.
- **Los Angeles Superior Court (Case No. 20STCV37498; Dept. 76 and Dept. 74):** Fraudulent inflation of a ~\$90M judgment to \$900M is on record.
- **UK High Court, King’s Bench Division (Case No. KB-2025-001991):** The names of your senior lawyers are read into the record as part of a systemic racketeering cross-complaint.
- **U.S. District Court, District of Columbia (RICO complaint):** Your firm’s conduct is cited as predicate racketeering acts.

---

### Your Personal Exposure

If you continue to lend your names, signatures, or labor to these filings, you are **acting as agents of a criminal conspiracy**. That exposes you personally to:

- Liability under **RICO statutes** in the United States.
- Liability for **contempt of court** in Antigua for aiding defaulted defendants.
- Potential **disciplinary and disbarment proceedings** with the State Bar of California.
- Future **criminal referrals** to UK, U.S., and Caribbean authorities.

---

## Demand

You are directed to immediately:

1. Cease participation in filings connected to the fraudulent \$900M enforcement campaign.
2. Notify your supervising attorneys that you will not aid in further criminal infractions.
3. Preserve all internal communications and documents regarding Jane Doe, Nichols, or related discovery – failure to do so may be treated as obstruction of justice.

---

## Final Notice

This is not a request – it is a warning. **By remaining silent or complicit, you assume the same liability as your principals.** When proceedings advance, your names will not be shielded by “just following orders.”

Govern yourselves accordingly.

Sincerely,

**Alkiviades David**

Ambassador-at-Large, Green Economy

Antigua & Barbuda

# **EXHIBIT “C”**

1 James G. Bohm, Esq. (SBN 132430)  
*jbohm@bohmwildish.com*  
2 Cecilia Preciado, Esq. (SBN 159309)  
*cpreciado@bohmwildish.com*  
3 BOHM WILDISH & MATSEN, LLP  
600 Anton Blvd, Suite 640  
4 Costa Mesa, California 92626  
Tel: (714) 384-6500  
5 Fax: (714) 384-6501

6 Attorneys for Defendant, ALKIVIADES DAVID

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**

9 JANE DOE, an Adult Individual Suing Under  
10 Anonymity Due to Privacy and Safety  
11 Plaintiff,  
12 v.  
13 ALKIVIADES DAVID, an Individual, a.k.a.  
14 ALKI DAVID,  
15 Defendants.  
16

Case No. 20STCV37498

**DEFENDANT ALKIVIADES DAVID'S  
RESPONSES TO PLAINTIFF JANE DOE'S  
JUDGMENT DEBTOR REQUESTS FOR  
PRODUCTION OF DOCUMENTS, SET  
ONE**

17 **PROPOUNDING PARTY:** PLAINTIFF JANE DOE

18 (Erroneously identified as: PLAINTIFF, AVA CHRUNIAK)

19 **RESPONDING PARTY:** DEFENDANT, ALKIVIADES DAVID

20 (Erroneously identified as: DEFENDANT, SOLE ADDICTS LLC)

21 **SET: ONE (1)**

22 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

23 Pursuant to Code of Civil Procedure section 708.020 et seq., and C.C.P Section 2031.010 et.  
24 seq., Defendant, Alkiviades David ("Responding Party"), hereby provides the following responses  
25 to Request for Production of Documents, Set One ("Requests"):

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1 **GENERAL OBJECTIONS**

2 1. Respondent Party objects to this Set of Demand for Production as the Propounding Party is  
3 listed as “PLAINTIFF, AVA CHRUNIAK” and the Respondent Party is designated as:  
4 “DEFENDANT, SOLE ADDICTS LLC” that have no bearing on this case.

5 2. Responding Party objects on the ground that he was not personally served with this set of  
6 Demand for Production.

7 3. By responding to the Demand for Production, Responding Party does not concede that the  
8 information sought is relevant.

9 4. None of Responding Party’s Responses is an admission about (a) the existence of any  
10 document or information, (b) the relevance or admissibility of any document or information, or (c)  
11 the truth or accuracy of any statement or characterization contained in the Demand for Production  
12 (including definitions therein).

13 5. Responding Party objects to each Demand for Production below to the extent that it is  
14 broader than or imposes obligations or duties beyond those imposed by the Code of Civil  
15 Procedure.

16 6. Responding Party objects to each Demand for Production to the extent that it is vague and  
17 ambiguous, overly broad in scope and/or time, oppressive, unduly burdensome, and/or not  
18 reasonably calculated to lead to the discovery of admissible evidence.

19 7. Responding Party objects to each Demand for Production to the extent that it requires the  
20 disclosure of information protected by the attorney-client privilege, work product doctrine, and/or  
21 any other applicable privilege or immunity against disclosure; Responding Party hereby asserts such  
22 privileges and immunities.

23 8. Responding Party objects to each Demand for Production to the extent that it seeks  
24 information that is publicly available and equally available to the requesting party.

25 9. Responding Party objects to each Demand for Production to the extent that it seeks a  
26 response related to information that is not in Responding Party’s possession, custody, or control.

27 10. Responding Party objects to each Demand for Production to the extent that it seeks

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1 information that is duplicative of other discovery questions.

2 11. Responding Party objects to each Demand for Production to the extent that it seeks  
3 information which does not aid in the enforcement of the money judgment.

4 12. Responding Party objects to each Demand for Production to the extent it may be construed  
5 as limiting or restricting Responding Party's right to rely upon any document, information, or  
6 omitted information for any purpose whatsoever including, but not limited to, the use of responsive  
7 documents or an inspection as evidence at any subsequent hearing, trial, or other proceeding.

8 13. Responding Party objects to the terms "you" and "your" to the extent that those terms  
9 purport to include persons or entities that are not parties to this action, are not Judgment Debtors, or  
10 that Responding Party does not control, and to the extent the terms include within their scope any  
11 information protected by the attorney-client, work product, and/or any other applicable privilege.

12 14. Responding Party asserts each of these General Objections in response to each Demand for  
13 Production and incorporates these General Objections into each of his Responses by reference as if  
14 explicitly stated therein. Responding Party's Responses are made without waiving these General  
15 Objections and the specific objections contained in the Responses.

16 **RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION**

17 **REQUEST FOR PRODUCTION NO. 1:**

18 All DOCUMENTS EVIDENCING any FINANCIAL ACCOUNTS maintained by YOU  
19 individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR  
20 benefit during the past (10) years.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

22 Objection: Responding Party objects to the term "YOU" as defined in the "Definitions"  
23 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
24 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
25 control.

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1           Objection: This Demand for Production is overbroad and as such, seeks information which  
2 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
3 the money judgment.

4           Objection: This Demand for Production is overbroad and as such, seeks to invade  
5 Responding Party’s right of privacy and the right of privacy of third parties.

6           Objection: This Demand for Production seeks to include information concerning third  
7 parties who are not Judgment debtors to Plaintiff.

8           Objection: This Demand for Production is overbroad and as such seeks information  
9 protected by the attorney-client privilege.

10          Objection: This Demand for Production is overbroad and as such seeks information  
11 protected by the attorney-client privilege.

12          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
13 oppressive, and harassing.

14 **REQUEST FOR PRODUCTION NO. 2:**

15          All DOCUMENTS EVIDENCING any FINANCIAL INSTRUMENTS held by YOU  
16 individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR  
17 benefit during the past (10) years.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

19          Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
20 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
21 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
22 control.

23          Objection: This Demand for Production is overbroad and as such, seeks information which  
24 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
25 the money judgment.

26          Objection: This Demand for Production is overbroad and as such, seeks to invade  
27 Responding Party’s right of privacy and the right of privacy of third parties.

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1           Objection: This Demand for Production seeks to include information concerning third  
2 parties who are not Judgment debtors to Plaintiff.

3           Objection: This Demand for Production is overbroad and as such seeks information  
4 protected by the attorney-client privilege.

5           Objection: This Demand for Production is overbroad and as such seeks information  
6 protected by the attorney-client privilege.

7           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
8 oppressive, and harassing.

9 **REQUEST FOR PRODUCTION NO. 3:**

10           All DOCUMENTS EVIDENCING any ownership interest YOU maintained in any  
11 BUSINESSES during the past ten (10) years.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

13           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
14 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
15 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
16 control.

17           Objection: This Demand for Production is overbroad and as such, seeks information which  
18 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
19 the money judgment.

20           Objection: This Demand for Production is overbroad and as such, seeks to invade  
21 Responding Party’s right of privacy and the right of privacy of third parties.

22           Objection: This Demand for Production is overbroad and as such seeks information  
23 protected by the attorney-client privilege.

24           Objection: This Demand for Production is overbroad and as such seeks information  
25 protected by the attorney-client privilege.

26           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
27 oppressive, and harassing.

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1 **REQUEST FOR PRODUCTION NO. 4:**

2 All DOCUMENTS EVIDENCING YOUR current sources of income and/or compensation.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

4 Objection: Responding Party objects to the term “YOUR” as defined in the “Definitions”  
5 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
6 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
7 control.

8 Objection: The definition of “EVIDENCE” is overbroad.

9 Objection: This Demand for Production is overbroad and as such, seeks information which  
10 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
11 the money judgment.

12 Objection: This Demand for Production is overbroad and as such, seeks to invade  
13 Responding Party’s right of privacy and the right of privacy of third parties.

14 Objection: This Demand for Production is overbroad and as such seeks information  
15 protected by the attorney-client privilege.

16 Objection: This Demand for Production is overbroad and as such seeks information  
17 protected by the attorney-client privilege.

18 Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
19 oppressive, and harassing.

20 **REQUEST FOR PRODUCTION NO. 5:**

21 All DOCUMENTS EVIDENCING YOUR sources of income and/or compensation during  
22 the past ten (10) years.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

24 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
25 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
26 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
27 control.

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1           Objection: Vague and ambiguous.

2           Objection: This Demand for Production is overbroad and as such, seeks information which  
3 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
4 the money judgment.

5           Objection: The definition of “EVIDENCE” is overbroad.

6           Objection: This Demand for Production is overbroad and as such, seeks to invade  
7 Responding Party’s right of privacy and the right of privacy of third parties.

8           Objection: This Demand for Production is overbroad and as such seeks information  
9 protected by the attorney-client privilege.

10          Objection: This Demand for Production is overbroad and as such seeks information  
11 protected by the attorney-client privilege.

12          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
13 oppressive, and harassing.

14 **REQUEST FOR PRODUCTION NO. 6:**

15           All DOCUMENTS EVIDENCING all trusts for which are currently or have been a  
16 beneficiary or trustee during the past ten (10) years.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

18           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
19 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
20 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
21 control.

22           Objection: This Demand for Production is overbroad and as such, seeks information which  
23 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
24 the money judgment.

25           Objection: This Demand for Production is overbroad and as such, seeks to invade  
26 Responding Party’s right of privacy and the right of privacy of third parties.

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1           Objection: This Demand for Production seeks information regarding person(s) that are not  
2 Judgment debtors in this action.

3           Objection: This Demand for Production is overbroad and as such seeks information  
4 protected by the attorney-client privilege.

5           Objection: This Demand for Production is overbroad and as such seeks information  
6 protected by the attorney-client privilege.

7           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
8 oppressive, and harassing.

9 **REQUEST FOR PRODUCTION NO. 7:**

10           All DOCUMENTS EVIDENCING all real property or real estate owned by YOU  
11 individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR  
12 benefit during the past (10) years.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

14           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
15 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
16 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
17 control.

18           Objection: This Demand for Production is overbroad and as such, seeks information which  
19 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
20 the money judgment.

21           Objection: This Demand for Production is overbroad and as such, seeks to invade  
22 Responding Party’s right of privacy and the right of privacy of third parties.

23           Objection: This Demand for Production seeks information from persons/entities that are not  
24 Judgment Debtors in this action.

25           Objection: This Demand for Production is overbroad and as such seeks information  
26 protected by the attorney-client privilege.

27

28

1           Objection: This Demand for Production is overbroad and as such seeks information  
2 protected by the attorney-client privilege.

3           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
4 oppressive, and harassing.

5 **REQUEST FOR PRODUCTION NO. 8:**

6           All DOCUMENTS EVIDENCING any mortgage statements RELATED TO any real  
7 property YOU owned during the past ten (10) years.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

9           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
10 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
11 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
12 control.

13           Objection: This Demand for Production is overbroad and as such, seeks information which  
14 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
15 the money judgment.

16           Objection: This Demand for Production is overbroad and as such, seeks to invade  
17 Responding Party’s right of privacy.

18           Objection: This Demand for Production is overbroad and as such seeks information  
19 protected by the attorney-client privilege.

20           Objection: This Demand for Production is overbroad and as such seeks information  
21 protected by the attorney-client privilege.

22           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
23 oppressive, and harassing.

24 **REQUEST FOR PRODUCTION NO. 9:**

25           All DOCUMENTS EVIDENCING any tax bills RELATED TO any real property YOU own  
26 or have owned within the past ten (10) years.

27 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

28

1           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
2 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
3 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
4 control.

5           Objection: This Demand for Production is overbroad and as such, seeks information which  
6 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
7 the money judgment.

8           Objection: This Demand for Production is overbroad and as such, seeks to invade  
9 Responding Party’s right of privacy.

10          Objection: This Demand for Production is overbroad and as such seeks information  
11 protected by the attorney-client privilege.

12          Objection: This Demand for Production is overbroad and as such seeks information  
13 protected by the attorney-client privilege.

14          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
15 oppressive, and harassing.

16 **REQUEST FOR PRODUCTION NO. 10:**

17           All DOCUMENTS EVIDENCING any trust, estate, or inheritance from which YOU expect  
18 to receive funds, property or assets during the next ten (10) years.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

20           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
21 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
22 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
23 control.

24           Objection: This Demand for Production is overbroad and as such, seeks information which  
25 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
26 the money judgment.

27

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1           Objection: This Demand for Production is overbroad and as such, seeks to invade  
2 Responding Party’s right of privacy and the right of privacy of third parties.

3           Objection: This Demand for Production is overbroad and as such seeking information from  
4 person(s) that are not Judgment Debtors in this action.

5           Objection: This Demand for Production is overbroad and as such seeks information  
6 protected by the attorney-client privilege.

7           Objection: This Demand for Production is overbroad and as such seeks information  
8 protected by the attorney-client privilege.

9           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
10 oppressive, and harassing.

11 **REQUEST FOR PRODUCTION NO. 11:**

12           All DOCUMENTS RELATED TO any loan application(s) submitted by YOU, or any other  
13 PERSON on YOUR behalf, to any bank, credit union, or lender during the past ten (10) years.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

15           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
16 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
17 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
18 control.

19           Objection: This Demand for Production is overbroad and as such, seeks information which  
20 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
21 the money judgment.

22           Objection: This Demand for Production is overbroad and as such, seeks to invade  
23 Responding Party’s right of privacy and the right of privacy of third parties.

24           Objection: This Demand for Production is overbroad and as such seeks information  
25 protected by the attorney-client privilege.

26           Objection: This Demand for Production is overbroad and as such seeks information  
27 protected by the attorney-client privilege.

28

1           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
2           oppressive, and harassing.

3           **REQUEST FOR PRODUCTION NO. 12:**

4           All DOCUMENTS RELATED TO any credit application(s) submitted by YOU, or any  
5           other PERSON on YOUR behalf, to any bank, credit union, or lender in the past ten (10) years.

6           **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

7           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
8           because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
9           that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
10          control.

11          Objection: This Demand for Production is overbroad and as such, seeks information which  
12          is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
13          the money judgment.

14          Objection: This Demand for Production is overbroad and as such, seeks to invade  
15          Responding Party’s right of privacy and the right of privacy of third parties.

16          Objection: This Demand for Production is overbroad and as such seeks information  
17          protected by the attorney-client privilege.

18          Objection: This Demand for Production is overbroad and as such seeks information  
19          protected by the attorney-client privilege.

20          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
21          oppressive, and harassing.

22          **REQUEST FOR PRODUCTION NO. 13:**

23          All DOCUMENTS EVIDENCING any stocks YOU owned during the last ten (10) years,  
24          including but not limited to account statements, certificates, or transaction records.

25          **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

26          Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
27          because the term is overbroad, vague and ambiguous, and purports to include persons or entities

28

1 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
2 control.

3           Objection: This Demand for Production is overbroad and as such, seeks information which  
4 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
5 the money judgment.

6           Objection: This Demand for Production is overbroad and as such, seeks to invade  
7 Responding Party's right of privacy.

8           Objection: This Demand for Production is overbroad and as such seeks information  
9 protected by the attorney-client privilege.

10           Objection: This Demand for Production is overbroad and as such seeks information  
11 protected by the attorney-client privilege.

12           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
13 oppressive, and harassing.

14 **REQUEST FOR PRODUCTION NO. 14:**

15           All DOCUMENTS EVIDENCING any bonds or promissory notes YOU owned in the past  
16 ten (10) years.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

18           Objection: Responding Party objects to the term "YOU" as defined in the "Definitions"  
19 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
20 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
21 control.

22           Objection: This Demand for Production is overbroad and as such, seeks information which  
23 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
24 the money judgment.

25           Objection: This Demand for Production is overbroad and as such, seeks to invade  
26 Responding Party's right of privacy and the right of privacy of third parties.

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28

1           Objection: This Demand for Production is overbroad and as such seeks information  
2 protected by the attorney-client privilege.

3           Objection: This Demand for Production is overbroad and as such seeks information  
4 protected by the attorney-client privilege.

5           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
6 oppressive, and harassing.

7 **REQUEST FOR PRODUCTION NO. 15:**

8           All DOCUMENTS EVIDENCING any mortgages, promissory notes, or judgments YOU  
9 possessed in the past ten (10) years.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

11           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
12 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
13 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
14 control.

15           Objection: This Demand for Production is overbroad and as such, seeks information which  
16 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
17 the money judgment.

18           Objection: This Demand for Production is overbroad and as such, seeks to invade  
19 Responding Party’s right of privacy and the right of privacy of third parties.

20           Objection: This Demand for Production is overbroad and as such seeks information  
21 protected by the attorney-client privilege.

22           Objection: This Demand for Production is overbroad and as such seeks information  
23 protected by the attorney-client privilege.

24           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
25 oppressive, and harassing.

26 **REQUEST FOR PRODUCTION NO. 16:**

27           All DOCUMENTS EVIDENCING any copyrights, patents, or other intellectual property  
28

1 rights owned by YOU, or by any other PERSON on YOUR behalf or for YOUR benefit, during the  
2 past ten (10) years.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

4       Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
5 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
6 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
7 control.

8       Objection: This Demand for Production is overbroad and as such, seeks information which  
9 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
10 the money judgment.

11       Objection: This Demand for Production is overbroad and as such, seeks to invade  
12 Responding Party’s right of privacy and the right of privacy of third parties.

13       Objection: This Demand for Production is overbroad and as such seeks information  
14 protected by the attorney-client privilege.

15       Objection: This Demand for Production is overbroad and as such seeks information  
16 protected by the attorney-client privilege.

17       Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
18 oppressive, and harassing.

19 **REQUEST FOR PRODUCTION NO. 17:**

20       All DOCUMENTS RELATING to any United States bonds YOU owned during the past ten  
21 (10) years.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

23       Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
24 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
25 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
26 control.

28

1           Objection: This Demand for Production is overbroad and as such, seeks information which  
2 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
3 the money judgment.

4           Objection: This Demand for Production is overbroad and as such, seeks to invade  
5 Responding Party’s right of privacy and the right of privacy of third parties.

6           Objection: This Demand for Production is overbroad and as such seeks information  
7 protected by the attorney-client privilege.

8           Objection: This Demand for Production is overbroad and as such seeks information  
9 protected by the attorney-client privilege.

10          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
11 oppressive, and harassing.

12 **REQUEST FOR PRODUCTION NO. 18:**

13          All DOCUMENTS EVIDENCING ownership of any automobile(s) by YOU, or by any  
14 other PERSON on YOUR behalf or for YOUR benefit, during the past ten (10) years.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

16          Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
17 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
18 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
19 control.

20          Objection: This Demand for Production is overbroad and as such, seeks information which  
21 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
22 the money judgment.

23          Objection: This Demand for Production is overbroad and as such, seeks to invade  
24 Responding Party’s right of privacy and the right of privacy of third parties.

25          Objection: This Demand for Production is overbroad and as such seeks information  
26 protected by the attorney-client privilege.

28

1           Objection: This Demand for Production is overbroad and as such seeks information  
2 protected by the attorney-client privilege.

3           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
4 oppressive, and harassing.

5 **REQUEST FOR PRODUCTION NO. 19:**

6           All DOCUMENTS EVIDENCING ownership of any watercrafts by YOU, or by any other  
7 PERSON on YOUR behalf or for YOUR benefit, during the past ten (10) years.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

9           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
10 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
11 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
12 control.

13           Objection: This Demand for Production is overbroad and as such, seeks information which  
14 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
15 the money judgment.

16           Objection: This Demand for Production is overbroad and as such, seeks to invade  
17 Responding Party’s right of privacy and the right of privacy of third parties.

18           Objection: This Demand for Production is overbroad and as such seeks information  
19 protected by the attorney-client privilege.

20           Objection: This Demand for Production is overbroad and as such seeks information  
21 protected by the attorney-client privilege.

22           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
23 oppressive, and harassing.

24 **REQUEST FOR PRODUCTION NO. 20:**

25           All DOCUMENTS EVIDENCING ownership of any aircrafts by YOU, or by any other  
26 PERSON on YOUR behalf or for YOUR benefit, during the last ten (10) years.

27 ///

28

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

2           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
3 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
4 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
5 control.

6           Objection: This Demand for Production is overbroad and as such, seeks information which  
7 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
8 the money judgment.

9           Objection: This Demand for Production is overbroad and as such, seeks to invade  
10 Responding Party’s right of privacy and the right of privacy of third parties.

11           Objection: This Demand for Production is overbroad and as such seeks information  
12 protected by the attorney-client privilege.

13           Objection: This Demand for Production is overbroad and as such seeks information  
14 protected by the attorney-client privilege.

15           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
16 oppressive, and harassing.

17 **REQUEST FOR PRODUCTION NO. 21:**

18           All DOCUMENTS RELATING to any safety deposit box held or accessed by YOU during  
19 the past ten (10) years.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

21           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
22 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
23 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
24 control.

25           Objection: This Demand for Production is overbroad and as such, seeks information which  
26 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
27 the money judgment.

28

1           Objection: This Demand for Production is overbroad and as such, seeks to invade  
2 Responding Party’s right of privacy and the right of privacy of third parties.

3           Objection: This Demand for Production is overbroad and as such seeks information  
4 protected by the attorney-client privilege.

5           Objection: This Demand for Production is overbroad and as such seeks information  
6 protected by the attorney-client privilege.

7           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
8 oppressive, and harassing.

9 **REQUEST FOR PRODUCTION NO. 22:**

10           All DOCUMENTS RELATING to any loans or advances YOU have received against a life  
11 insurance policy during the past ten (10) years.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

13           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
14 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
15 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
16 control.

17           Objection: This Demand for Production is overbroad and as such, seeks information which  
18 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
19 the money judgment.

20           Objection: This Demand for Production is overbroad and as such, seeks to invade  
21 Responding Party’s right of privacy and the right of privacy of third parties.

22           Objection: This Demand for Production is overbroad and as such seeks information  
23 protected by the attorney-client privilege.

24           Objection: This Demand for Production is overbroad and as such seeks information  
25 protected by the attorney-client privilege.

26           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
27 oppressive, and harassing.

28

1 **REQUEST FOR PRODUCTION NO. 23:**

2 All DOCUMENTS EVIDENCING any PERSON that owes YOU money, including the  
3 amount owed, basis for the debt, and repayment terms.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

5 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
6 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
7 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
8 control.

9 Objection: This Demand for Production is overbroad and as such seeks information  
10 protected by the attorney-client privilege.

11 Objection: This Demand for Production is overbroad and as such seeks information  
12 protected by the attorney-client privilege.

13 Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
14 oppressive, and harassing.

15 **REQUEST FOR PRODUCTION NO. 24:**

16 All DOCUMENTS EVIDENCING any interest YOU have or have had in the estate of a  
17 deceased person, including wills, trust documents, probate filings, or communications regarding any  
18 such interest.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

20 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
21 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
22 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
23 control.

24 Objection: This Demand for Production is overbroad and as such, seeks information which  
25 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
26 the money judgment.

28

1           Objection: This Demand for Production is overbroad and as such, seeks to invade  
2 Responding Party’s right of privacy and the right of privacy of third parties.

3           Objection: This Demand for Production is overbroad and as such seeks information  
4 protected by the attorney-client privilege.

5           Objection: This Demand for Production is overbroad and as such seeks information  
6 protected by the attorney-client privilege.

7           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
8 oppressive, and harassing.

9 **REQUEST FOR PRODUCTION NO. 25:**

10           All DOCUMENTS RELATED to any residential property in which YOU have resided  
11 during the past ten (10) years.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25:**

13           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
14 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
15 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
16 control.

17           Objection: This Demand for Production is overbroad and as such, seeks information which  
18 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
19 the money judgment.

20           Objection: This Demand for Production is overbroad and as such, seeks to invade  
21 Responding Party’s right of privacy and the right of privacy of third parties.

22           Objection: This Demand for Production is overbroad and as such seeks information  
23 protected by the attorney-client privilege.

24           Objection: This Demand for Production is overbroad and as such seeks information  
25 protected by the attorney-client privilege.

26           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
27 oppressive, and harassing.

28

1 **REQUEST FOR PRODUCTION NO. 26:**

2 All DOCUMENTS RELATED to any ownership or possessory interest YOU have or have  
3 had in any real property in the United States of America during the last ten (10) years.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

5 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
6 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
7 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
8 control.

9 Objection: This Demand for Production is overbroad and as such, seeks information which  
10 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
11 the money judgment.

12 Objection: This Demand for Production is overbroad and as such, seeks to invade  
13 Responding Party’s right of privacy and the right of privacy of third parties.

14 Objection: This Demand for Production is overbroad and as such seeks information  
15 protected by the attorney-client privilege.

16 Objection: This Demand for Production is overbroad and as such seeks information  
17 protected by the attorney-client privilege.

18 Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
19 oppressive, and harassing.

20 **REQUEST FOR PRODUCTION NO. 27:**

21 All DOCUMENTS RELATED to any ownership or possessory interest YOU have or have  
22 had in any real property outside of the United States of America during the last ten (10) years.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. 27:**

24 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
25 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
26 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
27 control.

28

1           Objection: This Demand for Production is overbroad and as such, seeks information which  
2 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
3 the money judgment.

4           Objection: This Demand for Production is overbroad and as such, seeks to invade  
5 Responding Party’s right of privacy and the right of privacy of third parties.

6           Objection: This Demand for Production is overbroad and as such seeks information  
7 protected by the attorney-client privilege.

8           Objection: This Demand for Production is overbroad and as such seeks information  
9 protected by the attorney-client privilege.

10          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
11 oppressive, and harassing.

12 **REQUEST FOR PRODUCTION NO. 28:**

13           All DOCUMENTS EVIDENCING all income, salaries, bonuses, disbursements, and/or  
14 other compensation YOU received from YOUR BUSINESSES during the past ten (10) years.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

16           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
17 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
18 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
19 control.

20           Objection: This Demand for Production is overbroad and as such, seeks information which  
21 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
22 the money judgment.

23           Objection: This Demand for Production is overbroad and as such, seeks to invade  
24 Responding Party’s right of privacy and the right of privacy of third parties.

25           Objection: This Demand for Production is overbroad and as such seeks information  
26 protected by the attorney-client privilege.

28

1           Objection: This Demand for Production is overbroad and as such seeks information  
2 protected by the attorney-client privilege.

3           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
4 oppressive, and harassing.

5 **REQUEST FOR PRODUCTION NO. 29:**

6           All DOCUMENTS EVIDENCING any accountants, financial advisors, certified public  
7 accountants, and/or tax advisors with whom YOU consulted during the past ten (10) years.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 29:**

9           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
10 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
11 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
12 control.

13           Objection: This Demand for Production is overbroad and as such, seeks information which  
14 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
15 the money judgment.

16           Objection: This Demand for Production is overbroad and as such, seeks to invade  
17 Responding Party’s right of privacy and the right of privacy of third parties.

18           Objection: This Demand for Production is overbroad and as such seeks information  
19 protected by the attorney-client privilege.

20           Objection: This Demand for Production is overbroad and as such seeks information  
21 protected by the attorney-client privilege.

22           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
23 oppressive, and harassing.

24 **REQUEST FOR PRODUCTION NO. 30:**

25           All DOCUMENTS RELATED TO any disability pensions on any insurance policy that  
26 YOU have received during the past ten (10) years.

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1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 30:**

2           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
3 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
4 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
5 control.

6           Objection: This Demand for Production is overbroad and as such, seeks information which  
7 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
8 the money judgment.

9           Objection: This Demand for Production is overbroad and as such, seeks to invade  
10 Responding Party’s right of privacy and the right of privacy of third parties.

11           Objection: This Demand for Production is overbroad and as such seeks information  
12 protected by the attorney-client privilege.

13           Objection: This Demand for Production is overbroad and as such seeks information  
14 protected by the attorney-client privilege.

15           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
16 oppressive, and harassing.

17 **REQUEST FOR PRODUCTION NO. 31:**

18           All DOCUMENTS EVIDENCING the present value, description and location of all real and  
19 personal assets transferred by YOU to YOUR children during the last ten (10) years, and the  
20 consideration paid for each such transfer.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

22           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
23 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
24 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
25 control.

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1           Objection: This Demand for Production is overbroad and as such, seeks information which  
2 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
3 the money judgment.

4           Objection: This Demand for Production is overbroad and as such, seeks to invade  
5 Responding Party’s right of privacy and the right of privacy of third parties.

6           Objection: This Demand for Production is overbroad and as such seeks information  
7 protected by the attorney-client privilege.

8           Objection: This Demand for Production is overbroad and as such seeks information  
9 protected by the attorney-client privilege.

10          Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
11 oppressive, and harassing.

12 **REQUEST FOR PRODUCTION NO. 32:**

13          All DOCUMENTS EVIDENCING any money YOU transferred to YOUR children during  
14 the past ten (10) years.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

16          Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
17 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
18 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
19 control.

20          Objection: This Demand for Production is overbroad and as such, seeks information which  
21 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
22 the money judgment.

23          Objection: This Demand for Production is overbroad and as such, seeks to invade  
24 Responding Party’s right of privacy and the right of privacy of third parties.

25          Objection: This Demand for Production is overbroad and as such seeks information  
26 protected by the attorney-client privilege.

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1           Objection: This Demand for Production is overbroad and as such seeks information  
2 protected by the attorney-client privilege.

3           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
4 oppressive, and harassing.

5 **REQUEST FOR PRODUCTION NO. 33:**

6           All DOCUMENTS EVIDENCING to any real property in which YOU have or have had an  
7 interest (whether equity, security, monetary, debt, or other legal interest) in the Unites States of  
8 America during the past ten (10) years.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

10           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
11 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
12 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
13 control.

14           Objection: This Demand for Production is overbroad and as such, seeks information which  
15 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
16 the money judgment.

17           Objection: This Demand for Production is overbroad and as such, seeks to invade  
18 Responding Party’s right of privacy and the right of privacy of third parties.

19           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
20 oppressive, and harassing.

21 **REQUEST FOR PRODUCTION NO. 34:**

22           State the present value, description and location of all real and personal assets transferred by  
23 YOU to YOUR children during the last ten (10) years, and the consideration paid for each such  
24 transfer.

25 **RESPONSE TO REQUEST FOR PRODUCTION NO. 34:**

26           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
27 because the term is overbroad, vague and ambiguous, and purports to include persons or entities

1 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
2 control.

3           Objection: This Demand for Production is overbroad and as such, seeks information which  
4 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
5 the money judgment.

6           Objection: This Demand for Production is overbroad and as such, seeks to invade  
7 Responding Party's right of privacy and the right of privacy of third parties.

8           Objection: This Demand for Production is overbroad and as such is unduly burdensome,  
9 oppressive, and harassing.

10 **REQUEST FOR PRODUCTION NO. 35:**

11           IDENTIFY all art, jewelry, collectibles, and/or other luxury goods, with market values  
12 exceeding \$500, currently owned, in whole or in part, or possessed by YOU.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

14           Objection: Responding Party objects to the term "YOU" as defined in the "Definitions"  
15 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
16 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
17 control.

18           Objection: This Demand for Production is overbroad and as such, seeks information which  
19 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
20 the money judgment.

21           Objection: This Demand for Production is overbroad and as such, seeks to invade  
22 Responding Party's right of privacy and the right of privacy of third parties.

23           Objection: This Demand for Production is overbroad and as such seeks information  
24 protected by the attorney-client privilege.

25           Objection: This Demand for Production is overbroad and as such seeks information  
26 protected by the attorney-client privilege.

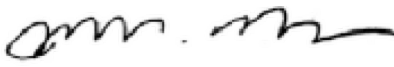
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Objection: This Demand for Production is overbroad and as such is unduly burdensome, oppressive, and harassing.

Dated: August 19, 2025

**BOHM WILDISH & MATSEN, LLP.**

By:   
\_\_\_\_\_

James G. Bohm, Esq.  
Cecilia Preciado, Esq.  
Attorneys for Defendant  
ALKIVIADES DAVID

**PROOF OF SERVICE**

(Jane Doe v. Alkiviades David, et al.; Case No. 20STCV37498)

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am over 18 years of age and not a party to this action. My business address is 600 Anton Blvd, Suite 640, Costa Mesa, California 92626. On **August 19, 2025**, I served the following document(s):

- **DEFENDANT ALKIVIADES DAVID’S RESPONSES TO PLAINTIFF JANE DOE’S JUDGMENT DEBTOR REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE.**

I served the above-referenced document(s) on the following person(s) in the following manner:

**By U.S. Mail:** I enclosed this/these document(s) in a sealed envelope or package addressed to the person(s) at the address(es) above and placed the envelope for collection and mailing following our ordinary business practices. I am readily familiar with our firm’s practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at Costa Mesa, California.

**BY E-MAIL/ELECTRONIC TRANSMISSION:** On **August 19, 2025**, I caused the above-referenced document(s) to be transmitted by electronic mail from [alesethbohmwildish.com](mailto:alesethbohmwildish.com) to the e-mail address(es) of the addressee(s) pursuant to Rule 2.251 of the California Rules of Court. The transmission was complete and without error and I did not receive, within reasonable time after transmission, any electronic message or other indication that the transmission was unsuccessful.

**ELECTRONIC SERVICE [*e-Service*] VIA FIRST LEGAL / FILE & SERVEXPRESS / ONELEGAL:** On **Tuesday, August 19, 2025**, I caused the above-referenced document(s) to be electronically served by submitting the electronic version of the document(s) to **FIRST LEGAL / FILE & SERVEXPRESS / ONELEGAL**, through their web interface at [www.FirstLegal.com](http://www.FirstLegal.com) / [www.secure.fileandservexpress.com](http://www.secure.fileandservexpress.com) / [www.OneLegal.com](http://www.OneLegal.com), which caused the documents to be sent by electronic transmission to the addressee(s) listed on the service list. The transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the above statements are true and correct. Executed on **August 19, 2025** at Costa Mesa, California.

*Antonia Leseth*

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Antonia Leseth

**SERVICE LIST**

(Jane Doe v. Alkiviades David, et al.; Case No. 20STCV37498)

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<p>Ebby S. Bakhtiar, Esq. <b>LIVINGSTON • BAKHTIAR</b> 3435 Wilshire Boulevard, Suite 1669 Los Angeles, CA 90010 T: (213) 632-1550 F: (213) 632-3100 <a href="mailto:esb@lb-lawyers.com">esb@lb-lawyers.com</a>;</p>	<p><i>Attorneys for Plaintiff,</i> JANE DOE</p>

# **EXHIBIT “D”**

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2 Cecilia Preciado, Esq. (SBN 159309)  
*cpreciado@bohmwildish.com*  
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4 Costa Mesa, California 92626  
Tel: (714) 384-6500  
5 Fax: (714) 384-6501

6 Attorneys for Defendant, ALKIVIADES DAVID

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **FOR THE COUNTY OF LOS ANGELES**

9 JANE DOE, an Adult Individual Suing Under  
10 Anonymity Due to Privacy and Safety  
11 Plaintiff,  
12  
13 v.  
14 ALKIVIADES DAVID, an Individual, a.k.a.  
ALKI DAVID,  
15  
16 Defendants.

Case No. 20STCV37498

**DEFENDANT ALKIVIADES DAVID'S  
RESPONSE TO PLAINTIFF JANE DOE'S  
JUDGMENT DEBTOR  
INTERROGATORIES TO ALKIVIADES  
DAVID PURSUANT TO CODE. CIV.  
PROC. §708.020**

17  
18 **PROPOUNDING PARTY: PLAINTIFF JANE DOE**  
19 **(Erroneously identified as: PLAINTIFF, AVA CHRUNIAK)**  
20 **RESPONDING PARTY: DEFENDANT, ALKIVIADES DAVID**  
21 **(Erroneously identified as: DEFENDANT, SOLE ADDICTS LLC)**  
22 **SET: ONE (1)**  
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**TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

Pursuant to Code of Civil Procedure section 708.020 et seq., and C.C.P Section 2030.010 et. seq., Defendant, Alkiviades David (“Responding Party”), hereby provides the following responses to Plaintiff, Jane Doe (“Requesting Party”) Special Interrogatories, Set One (“Requests”):

**GENERAL OBJECTIONS**

1. Respondent Party objects to this Set of Interrogatories as the Propounding Party is listed as “PLAINTIFF, AVA CHRUNIAK” and the Respondent Party is designated as: “DEFENDANT, SOLE ADDICTS LLC” that have no bearing on this case.

2. Responding Party object on the ground that he was not personally served with this set of Interrogatories.

3. By responding to the Interrogatories, Responding Party does not concede that the information sought is relevant. Responding Party provides these Responses while preserving and without waiving its rights (a) to object on any basis to the use of the information provided in the Responses; and (b) to object on any basis, at any time, to other discovery involving the subject matter of these Interrogatories.

4. None of Responding Party’s Responses is an admission about (a) the existence of any document or information, (b) the relevance or admissibility of any document or information, or (c) the truth or accuracy of any statement or characterization contained in the Interrogatories (including definitions therein).

5. Responding Party objects to each interrogatory below (“Interrogatory”) to the extent that it is broader than or imposes obligations or duties beyond those imposed by the Code of Civil Procedure.

6. Responding Party objects to each Interrogatory to the extent that it is vague and ambiguous, overly broad in scope and/or time, oppressive, unduly burdensome, and/or not reasonably calculated to lead to the discovery of admissible evidence.

1 7. Responding Party objects to each Interrogatory to the extent that it requires the disclosure of  
2 information protected by the attorney-client privilege, work product doctrine, and/or any other  
3 applicable privilege or immunity against disclosure; Responding Party hereby asserts such  
4 privileges and immunities.

5 8. Responding Party objects to each Interrogatory to the extent that it seeks information that is  
6 publicly available and equally available to the requesting party.

7 9. Responding Party objects to each Interrogatory to the extent that it seeks a response related  
8 to information that is not in Responding Party's possession, custody, or control.

9 10. Responding Party objects to each Interrogatory to the extent that it seeks information that is  
10 duplicative of other discovery questions.

11 11. Responding Party objects to each Interrogatory to the extent that it seeks information  
12 unrelated to the time or subject matter relevant to this action.

13 12. Responding Party objects to each Interrogatory to the extent it may be construed as limiting  
14 or restricting Responding Party's right to rely upon any document, information, or omitted  
15 information for any purpose whatsoever including, but not limited to, the use of responsive  
16 documents or an inspection as evidence at any subsequent hearing, trial, or other proceeding.

17 13. Responding Party objects to the terms "you" and "your" to the extent that those terms  
18 purport to include persons or entities that are not parties to this action, are not Judgment Debtors, or  
19 that Responding Party does not control, and to the extent the terms include within their scope any  
20 information protected by the attorney-client, work product, and/or any other applicable privilege.

21 14. Responding Party asserts each of these General Objections in response to each Interrogatory  
22 and incorporates these General Objections into each of its Responses by reference as if explicitly  
23 stated therein. Responding Party's Responses are made without waiving these General Objections  
24 and the specific objections contained in the Responses and/or supplemental Responses to each  
25 Interrogatory; if a specific response does not restate any objection already asserted to an  
26 Interrogatory, such omission should not be construed as a waiver of any objection previously  
27 asserted to that Interrogatory unless Responding Party states in writing that an objection is waived.

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**RESPONSES TO SPECIAL INTERROGATORIES**

**SPECIAL INTERROGATORY NO. 1:**

IDENTIFY all YOUR residence addresses for the past ten (10) years.

**RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

Objection: Responding Party objects to the term “YOUR” as defined in the “Definitions” because the term is overbroad, vague and ambiguous, and purports to include persons or entities that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not control.

Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant and includes a request for information which is not calculated to aid in enforcement of the money judgment.

Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s right of privacy.

**SPECIAL INTERROGATORY NO. 2:**

IDENTIFY all FINANCIAL ACCOUNTS held by YOU individually, jointly with any other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past (10) years.

**RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

Objection: Responding Party objects to the term “YOU” as defined in the “Definitions” because the term is overbroad, vague and ambiguous, and purports to include persons or entities that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not control.

Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant and includes a request for information which is not calculated to aid in enforcement of the money judgment.

Objection: Responding Party objects to this request because it seeks as a response information that is protected by Responding Party’s and/or a third party’s right to privacy under the California and United States Constitutions.

1 **SPECIAL INTERROGATORY NO. 3:**

2 IDENTIFY all BUSINESSES in which YOU currently maintain any ownership interest.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

4 Objection: Responding Party incorporates the General Objections by reference as through  
5 fully restated herein.

6 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
7 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
8 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
9 control and hence, includes a request for information which is not calculated to aid in enforcement  
10 of the money judgment.

11 **SPECIAL INTERROGATORY NO. 4:**

12 IDENTIFY all BUSINESSES in which YOU maintained any ownership interest during the  
13 past ten (10) years.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

15 Objection: Responding Party incorporates the General Objections by reference as through  
16 fully restated herein.

17 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
18 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
19 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
20 control.

21 Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
22 and includes a request for information which is not calculated to aid in enforcement of the money  
23 judgment.

24 Objection: Responding Party objects to this request because it seeks as a response  
25 information that is protected by Responding Party’s and/or a third party’s right to privacy under the  
26 California and United States Constitutions.

27 **SPECIAL INTERROGATORY NO. 5:**

28

1 IDENTIFY all YOUR current sources of income and/or compensation, including the  
2 amounts of income provided by each source.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

4 Objection: Responding Party objects to the term “YOUR” as defined in the “Definitions”  
5 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
6 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
7 control and as such, seeks information which is irrelevant and includes a request for information  
8 which is not calculated to aid in enforcement of the money judgment.

9 Objection: Responding Party objects to this request because it seeks as a response  
10 information that is protected by Responding Party’s and/or a third party’s right to privacy under the  
11 California and United States Constitutions.

12 Objection: This Interrogatory violates C.C.P. section 2030.060(f) in that it contains subparts  
13 and is compound, conjunctive, or disjunctive.

14 **SPECIAL INTERROGATORY NO. 6:**

15 IDENTIFY all YOUR sources of income and/or compensation during the past ten (10)  
16 years, including the amounts of income provided by each such source.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

18 Objection: Responding Party objects to the term “YOUR” as defined in the “Definitions”  
19 because the term is overbroad, vague and ambiguous, and purports to include persons or entities  
20 that are not parties to this action, are not Judgment Debtors, or that Responding Party does not  
21 control.

22 Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
23 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
24 the money judgment.

25 Objection: Responding Party objects to this request because it seeks as a response  
26 information that is protected by Responding Party’s and/or a third party’s right to privacy under the  
27 California and United States Constitutions.

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1           Objection: This Interrogatory violates C.C.P. section 2030.060(f) by containing subparts and  
2 is compound, conjunctive, or disjunctive.

3 **SPECIAL INTERROGATORY NO. 7:**

4           IDENTIFY all trusts for which YOU are currently or have been a beneficiary during the past  
5 ten (10) years.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

7           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
8 because the term is overbroad, vague, and ambiguous, and purports to include persons or entities  
9 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
10 control.

11           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
12 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
13 the money judgment.

14           Objection: Responding Party objects to this request because it seeks as a response  
15 information that is protected by Responding Party’s and/or a third party’s right to privacy under the  
16 California and United States Constitutions.

17           Objection: This Interrogatory violates C.C.P. section 2030.060(f) because it is compound  
18 and disjunctive.

19 **SPECIAL INTERROGATORY NO. 8:**

20           IDENTIFY all trusts for which YOU are currently or have been a trustee during the past ten  
21 (10) years.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

23           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
24 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
25 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
26 control.

28

1           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
2 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
3 the money judgment.

4           Objection: Responding Party objects to this request because it seeks as a response  
5 information that is protected by Responding Party's and/or a third party's right to privacy under the  
6 California and United States Constitutions.

7  
8 **SPECIAL INTERROGATORY NO. 9:**

9           IDENTIFY all FINANCIAL ACCOUNTS maintained by YOU individually, jointly with  
10 any other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past (10)  
11 years.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

13           Objection: Responding Party objects to the term "YOU" and "YOUR" as defined in the  
14 "Definitions" because the term is overbroad, vague and ambiguous, and purports to include persons  
15 or entities that are not parties to this action, are not Judgment Debtors, and/or that Responding Party  
16 does not control.

17           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
18 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
19 the money judgment.

20           Objection: Responding Party objects to this request because it seeks as a response  
21 information that is protected by Responding Party's and/or a third party's right to privacy under the  
22 California and United States Constitutions.

23 **SPECIAL INTERROGATORY NO. 10:**

24           IDENTIFY all FINANCIAL INSTRUMENTS owned by YOU individually, jointly with  
25 any other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past (10)  
26 years.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

28

1           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
2 because the term is overbroad, vague, and ambiguous, and purports to include persons or entities  
3 that are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
4 control.

5           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
6 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
7 the money judgment.

8           Objection: Responding Party objects to this request because it seeks as a response  
9 information that is protected by Responding Party’s and/or a third party’s right to privacy under the  
10 California and United States Constitutions.

11 **SPECIAL INTERROGATORY NO. 11:**

12           IDENTIFY all real property or real estate owned by YOU individually, jointly with any  
13 other PERSON, or by any other PERSON or BUSINESS for YOUR benefit during the past (10)  
14 years.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

16           Objection: Responding Party objects to the term “YOU” and “YOUR” as defined in the  
17 “Definitions” because the terms are overbroad, vague and ambiguous, and purport to include  
18 persons or entities that are not parties to this action, are not Judgment Debtors, and/or that  
19 Responding Party does not control.

20           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
21 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
22 the money judgment.

23           Objection: Responding Party objects to this request because it seeks as a response  
24 information that is protected by Responding Party’s and/or a third party’s right to privacy under the  
25 California and United States Constitutions.

26 **SPECIAL INTERROGATORY NO. 12:**

27           IDENTIFY each member, director, and/or officer of FILMON.TV, INC. during the last ten  
28

1 (10) years.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

3           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
4 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
5 the money judgment.

6           Objection: Responding Party objects to this request because it seeks as a response  
7 information that is protected by Responding Party's and/or a third party's right to privacy.

8           Objection: There is no Judgment against FILMON.TV, INC., as such, the information  
9 sought is irrelevant and not calculated to aid in the enforcement of the money judgment.

10           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) as it contains subparts,  
11 and is compound.

12 **SPECIAL INTERROGATORY NO. 13:**

13           IDENTIFY each member, director, and/or officer of HOLOGRAM USA  
14 ENTERTAINMENT, INC. during the last ten (10) years.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

16           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
17 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
18 the money judgment.

19           Objection: Responding Party objects to this request because it seeks as a response  
20 information that is protected by Responding Party's and/or a third party's right to privacy.

21           Objection: There is no Judgment against HOLOGRAM USA ENTERTAINMENT, INC., as  
22 such, the information sought is irrelevant and not calculated to aid in the enforcement of the money  
23 judgment.

24           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) as it contains subparts,  
25 and is compound.

26 **SPECIAL INTERROGATORY NO. 14:**

27           IDENTIFY each member, director, and/or officer of HOLOGRAM USA, INC. during the  
28

1 last ten (10) years.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

3           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
4 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
5 the money judgment.

6           Objection: Responding Party objects to this request because it seeks as a response  
7 information that is protected by Responding Party's and/or a third party's right to privacy.

8           Objection: There is no Judgment against HOLOGRAM USA, INC., as such, the information  
9 sought is irrelevant and not calculated to aid in the enforcement of the money judgment.

10           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) as it contains subparts,  
11 and is compound.

12 **SPECIAL INTERROGATORY NO. 15:**

13           IDENTIFY each member, director, and/or officer of SWISSX LOUNGE AG, INC. a.k.a  
14 SWISSX LOUNGE during the last ten (10) years.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

16           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
17 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
18 the money judgment.

19           Objection: Responding Party objects to this request because it seeks as a response  
20 information that is protected by Responding Party's and/or a third party's right to privacy.

21           Objection: There is no Judgment against SWISSX LOUNGE AG, INC., as such, the  
22 information sought is irrelevant and not calculated to aid in the enforcement of the money  
23 judgment.

24           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) as it contains subparts,  
25 and is compound.

26 **SPECIAL INTERROGATORY NO. 16:**

27           IDENTIFY each member, director, and/or officer of FILMONTV UK, LTD during the last  
28

1 ten (10) years.

2 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

3           Objection: This Interrogatory is overbroad as to time, and as such, seeks information which  
4 is irrelevant and includes a request for information which is not calculated to aid in enforcement of  
5 the money judgment.

6           Objection: Responding Party objects to this request because it seeks as a response  
7 information that is protected by Responding Party's and/or a third party's right to privacy.

8           Objection: There is no Judgment against FILMONTV UK, LTD as such, the information  
9 sought is irrelevant and not calculated to aid in the enforcement of the money judgment.

10           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) as it contains subparts,  
11 and is compound.

12 **SPECIAL INTERROGATORY NO. 17:**

13           IDENTIFY all real property in which YOU maintained any ownership interest, in any  
14 manner, during the past ten (10) years.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

16           Objection: Responding Party objects to the term "YOU" as defined in the "Definitions"  
17 because the term is overbroad, vague and ambiguous and purports to include persons or entities that  
18 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
19 control.

20           Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
21 and includes a request for information which is not calculated to aid in enforcement of the money  
22 judgment.

23           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party's  
24 right of privacy.

25 **SPECIAL INTERROGATORY NO. 18:**

26           IDENTIFY all motor vehicles and/or recreational vehicles YOU owned, leased, or have had  
27 a financial interest in during the last ten (10) years.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

2           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
3 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
4 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
5 control.

6           Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
7 and includes a request for information which is not calculated to aid in enforcement of the money  
8 judgment.

9           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
10 right of privacy.

11 **SPECIAL INTERROGATORY NO. 19:**

12           IDENTIFY all watercrafts and/or aircrafts YOU owned, leased, or have had a financial  
13 interest in during the last ten (10) years.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

15           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
16 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
17 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
18 control.

19           Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
20 and includes a request for information which is not calculated to aid in enforcement of the money  
21 judgment.

22           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
23 right of privacy.

24 **SPECIAL INTERROGATORY NO. 20:**

25           IDENTIFY all intellectual property in which YOU currently have or have had any  
26 ownership or other interest during the last ten (10) years.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

1           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
2 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
3 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
4 control.

5           Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
6 and includes a request for information which is not calculated to aid in enforcement of the money  
7 judgment.

8           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
9 right of privacy.

10          Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it is disjunctive and  
11 compound.

12 **SPECIAL INTERROGATORY NO. 21:**

13           IDENTIFY all businesses, corporations, partnerships, LLCs, or sole proprietorships in  
14 which YOU currently have any ownership or financial interest.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

16           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
17 because the term is overbroad and purports to include persons or entities that are not parties to this  
18 action, are not Judgment Debtors, and/or that Responding Party does not control.

19 **SPECIAL INTERROGATORY NO. 22:**

20           IDENTIFY all businesses, corporations, partnerships, LLCs, or sole proprietorships in  
21 which YOU have had any ownership interest during the last ten (10) years.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

23           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
24 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
25 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
26 control.

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1           Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
2 and includes a request for information which is not calculated to aid in enforcement of the money  
3 judgment.

4           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party's  
5 right of privacy.

6 **SPECIAL INTERROGATORY NO. 23:**

7           IDENTIFY each safety deposit box used by YOU, specifying (1) the banking institution  
8 where it is located; (2) in whose name it is listed; (3) how it is numbered or otherwise identified;  
9 and (4) its contents (including ownership and value of the contents).

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

11           Objection: Responding Party objects to the term "YOU" as defined in the "Definitions"  
12 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
13 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
14 control.

15           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
16 and is compound.

17 **SPECIAL INTERROGATORY NO. 24:**

18           IDENTIFY any judgments, garnishments, or liens that have been entered against YOU in  
19 the last five (5) years.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

21           Objection: Responding Party objects to the term "YOU" as defined in the "Definitions"  
22 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
23 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
24 control.

25           Objection: This Interrogatory seeks information equally available to or already in the  
26 possession of Propounding Party.

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1 **SPECIAL INTERROGATORY NO. 25:**

2 IDENTIFY all PERSON(S) from which YOU currently expect to receive any inheritance,  
3 trust disbursement, settlement, account receivable, rent receivable, or other monetary disbursement  
4 or payment during the next ten (10) years.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

6 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
7 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
8 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
9 control.

10 Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
11 and is compound.

12 Objection: This Interrogatory seeks information which calls for speculation.

13 Objection: This Interrogatory seeks to invade third party’s rights of privacy.

14 **SPECIAL INTERROGATORY NO. 26:**

15 State the expected time frames in which YOU anticipate receiving any inheritance, trust  
16 disbursement, settlement, account receivable, rent receivable, or other monetary payments from any  
17 PERSON during the next ten (10) years.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

19 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
20 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
21 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
22 control.

23 Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
24 and is compound.

25 Objection: This Interrogatory seeks information which calls for speculation.

26 Objection: This Interrogatory seeks to invade third party’s rights of privacy.

27 **SPECIAL INTERROGATORY NO. 27:**

28

1 IDENTIFY all accountants, financial advisors, certified public accountants, and/or tax  
2 advisors with whom YOU consulted during the past ten (10) years.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

4 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
5 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
6 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
7 control.

8 Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
9 and is compound.

10 Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
11 right of privacy and the right of privacy of third parties.

12 **SPECIAL INTERROGATORY NO. 28:**

13 IDENTIFY each corporate stock YOU owned in the last ten (10), including the stock’s name  
14 and the number of shares YOU own.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

16 Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
17 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
18 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
19 control.

20 Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
21 and is compound.

22 Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
23 right of privacy and the right of privacy of third parties.

24 **SPECIAL INTERROGATORY NO. 29:**

25 IDENTIFY all mortgages, promissory notes, judgments, copyrights, or patents YOU owned  
26 or possessed during the last ten (10).

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

2           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
3 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
4 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
5 control.

6           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
7 and is compound.

8           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
9 right of privacy and the right of privacy of third parties.

10 **SPECIAL INTERROGATORY NO. 30:**

11           IDENTIFY all United States bonds YOU owned during the last ten (10) years including its  
12 denomination, type, serial number, and value.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

14           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
15 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
16 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
17 control.

18           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
19 and is compound.

20           Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
21 right of privacy and the right of privacy of third parties.

22 **SPECIAL INTERROGATORY NO. 31:**

23           State whether YOU currently possess any cash outside of a bank, including the total  
24 amount(s) and location(s) of such cash.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

26           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
27 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that

1 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
2 control.

3           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains  
4 subparts.

5 **SPECIAL INTERROGATORY NO. 32:**

6           State whether YOU have borrowed against any life insurance policies, specifically stating  
7 the name of the insurer, the policy number, the amount borrowed, and the date(s) of such  
8 borrowing.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

10           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
11 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
12 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
13 control.

14           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains  
15 subparts.

16 **SPECIAL INTERROGATORY NO. 33:**

17           State the name and address of all YOUR current creditors, the amount(s) owed to each  
18 creditor, and whether they have any liens or encumbrances on any of YOUR assets or properties.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

20           Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
21 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
22 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
23 control.

24           Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains  
25 subparts.

26 **SPECIAL INTERROGATORY NO. 34:**

27           State the present value, description and location of all real and personal assets transferred by  
28

1 YOU to YOUR children during the last ten (10) years, and the consideration paid for each such  
2 transfer.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 34:**

4       Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
5 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
6 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
7 control.

8       Objection: This Interrogatory is overbroad and as such, seeks information which is irrelevant  
9 and includes a request for information which is not calculated to aid in enforcement of the money  
10 judgment.

11       Objection: This Interrogatory is overbroad and as such, seeks to invade Responding Party’s  
12 right of privacy and third party’s rights of privacy.

13       Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts  
14 and is compound.

15 **SPECIAL INTERROGATORY NO. 35:**

16       IDENTIFY all art, jewelry, collectibles, and/or other luxury goods, with market values  
17 exceeding \$500, currently owned, in whole or in part, or possessed by YOU.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 35:**

19       Objection: Responding Party objects to the term “YOU” as defined in the “Definitions”  
20 because the term is overbroad, vague and ambiguous, and purports to include persons or entities that  
21 are not parties to this action, are not Judgment Debtors, and/or that Responding Party does not  
22 control.

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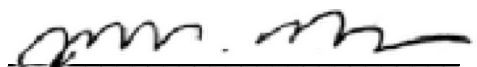
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Objection: This Interrogatory violates C.C.P. Section 2030.060(f) in that it contains subparts and is compound.

Dated: August 19, 2025

**BOHM WILDISH & MATSEN, LLP.**

By:   
James G. Bohm, Esq.  
Cecilia Preciado, Esq.  
Attorneys for Defendant  
ALKIVIADES DAVID

**PROOF OF SERVICE**

(Jane Doe v. Alkiviades David, et al.; Case No. 20STCV37498)

**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am over 18 years of age and not a party to this action. My business address is 600 Anton Blvd, Suite 640, Costa Mesa, California 92626. On **August 19, 2025**, I served the following document(s):

- **DEFENDANT ALKIVIADES DAVID’S RESPONSE TO PLAINTIFF JANE DOE’S JUDGMENT DEBTOR INTERROGATORIES TO ALKIVIADES DAVID PURSUANT TO CODE. CIV. PROC. §708.020.**

I served the above-referenced document(s) on the following person(s) in the following manner:

**By U.S. Mail:** I enclosed this/these document(s) in a sealed envelope or package addressed to the person(s) at the address(es) above and placed the envelope for collection and mailing following our ordinary business practices. I am readily familiar with our firm’s practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at Costa Mesa, California.

**BY E-MAIL/ELECTRONIC TRANSMISSION:** On **August 19, 2025**, I caused the above-referenced document(s) to be transmitted by electronic mail from [alesethbohmwildish.com](mailto:alesethbohmwildish.com) to the e-mail address(es) of the addressee(s) pursuant to Rule 2.251 of the California Rules of Court. The transmission was complete and without error and I did not receive, within reasonable time after transmission, any electronic message or other indication that the transmission was unsuccessful.

**ELECTRONIC SERVICE [*e-Service*] VIA FIRST LEGAL / FILE & SERVEXPRESS / ONELEGAL:** On **Tuesday, August 19, 2025**, I caused the above-referenced document(s) to be electronically served by submitting the electronic version of the document(s) to **FIRST LEGAL / FILE & SERVEXPRESS / ONELEGAL**, through their web interface at [www.FirstLegal.com](http://www.FirstLegal.com) / [www.secure.fileandservexpress.com](http://www.secure.fileandservexpress.com) / [www.OneLegal.com](http://www.OneLegal.com), which caused the documents to be sent by electronic transmission to the addressee(s) listed on the service list. The transmission was reported as complete and without error.

I declare under penalty of perjury under the laws of the State of California that the above statements are true and correct. Executed on **August 19, 2025** at Costa Mesa, California.

*Antonia Leseth*

\_\_\_\_\_  
Antonia Leseth

**SERVICE LIST**

(Jane Doe v. Alkiviades David, et al.; Case No. 20STCV37498)

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Gary A. Dordick, Esq. Dustin Z. Moaven, Esq. Brittney Ghadoushi, Esq. <b>DORDICK LAW CORPORATION</b> 1122 Wilshire Blvd. Los Angeles, CA 90017 T: (310) 551-0949 F: 855-299-4444 <a href="mailto:Gary@dordicklaw.com">Gary@dordicklaw.com</a> ; <a href="mailto:DZMeservice@dordicklaw.com">DZMeservice@dordicklaw.com</a> ; <a href="mailto:brittney@dordicklaw.com">brittney@dordicklaw.com</a> ; <a href="mailto:gustavo.gonzalez@dordicklaw.com">gustavo.gonzalez@dordicklaw.com</a> ;	<i>Attorneys for Plaintiff,</i> JANE DOE
Ebby S. Bakhtiar, Esq. <b>LIVINGSTON • BAKHTIAR</b> 3435 Wilshire Boulevard, Suite 1669 Los Angeles, CA 90010 T: (213) 632-1550 F: (213) 632-3100 <a href="mailto:esb@lb-lawyers.com">esb@lb-lawyers.com</a> ;	<i>Attorneys for Plaintiff,</i> JANE DOE

# **EXHIBIT “E”**

## Ceci Preciado

---

**From:** Ceci Preciado  
**Sent:** Thursday, September 18, 2025 1:03 PM  
**To:** Dustin Moaven; Cc: Dustin Moaven Eservice List  
**Cc:** Antonia Leseth; Jim Bohm; Cynthia Lopez  
**Subject:** FW: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive  
**Attachments:** Alki David - MC letter re debtor discovery.pdf

Tracking:	Recipient	Delivery	Read
	Dustin Moaven		
	Cc: Dustin Moaven Eservice List		
	Antonia Leseth	Delivered: 9/18/2025 1:03 PM	Read: 9/18/2025 1:51 PM
	Jim Bohm		
	Cynthia Lopez	Delivered: 9/18/2025 1:03 PM	

Mr. Moaven:

I am in receipt of your meet and confer letter. I am requesting an extension of time up to and including October 2, 2025 to address your letter and meet and confer with you in an effort to informally resolve the issues set forth in your correspondence sent September 4, 2025 regarding the Special Interrogatories and Demand for Production of Documents directed at Mr. David. I need more time to be able to address the meet and confer. **I agree to extend your motion to compel deadline the equivalent amount of time.**

As you know from my previous request for extension to respond to the subject discovery (which was denied), and from my recent applications for extension of time to file the appellate briefs on this matter (which the Court of Appeal granted), my schedule has been impacted as a result of a heavy trial schedule.

As I noted in my declaration in support of our request for extension to file the appeal brief, I am the attorney primarily responsible for the preparation of Appellant's Opening Brief in the above-referenced matter which presents an extensive time commitment. We have upcoming due dates on the briefing and Appendix.

I was in trial in Orange County Superior Court, Dept. L53 in a family law matter, In Re Marriage of Pearce, Orange County Superior Court Case No. 18D007188 for sixteen days on the following trial days: July 30, 2025, August 5, 2025, August 6, 2025, August 11, 2025, August 12, 2025, August 13, 2025, August 18, 2025, August 20, 2025, August 25, 2025 (partial day), August 27, 2025, August 28, 2025. September 9, 2025, September 10, 2025, September 11, 2025, September 12, 2025 in the afternoon and September 16, 2025 (afternoon). The evidence and argument concluded on September 16, 2025. I have been tasked by the Court to prepare the Statement of Decision on the 16-day trial by September 22, 2025. The Court has made rulings along the way during the Pearce trial, including a ruling on the conscionability of a spousal support provision in a premarital agreement pursuant to Family Code Section 1612c. On September 3, 2025, Opposing counsel requested a Statement of Decision with 27 questions. I was tasked to prepare the Statement of Decision on that issue and have it completed by September 9, 2025,

which I did. I was also tasked with preparing Prevailing Party motion for fees and reply, and opposing the Family Code Section 2030 fee request which was recently completed last week.

I had to prepare a Statement of Decision on Another Family Law Trial for a 16-day trial that was completed late July. That statement of decision was completed yesterday.  
12, 2025.

I am trailing on a jury trial in Dept. S26 of the Long Beach Superior Court in the matter entitled Lenders Group, A Partnership v. Carol Chamberlain. Los Angeles Superior Court Case No. 24LBCV01676. The Court is waiting for the Pearce trial to conclude and for opposing counsel's trial to conclude as well. Counsel and I are under Court order to continue meet and confer efforts to streamline exhibits, witnesses, issues and the case. We are ordered back on September 19, 2025 for a final status conference. I have been in trial preparations for a trial that is set to start September 22, 2025 in the matter entitled In Re Marriage of Vargas, Orange County Superior Court Case No. 23D001314 in Dept. L67.

I am also in trial preparations compiling pre-trial documents (Exhibits, witness lists, Family Code Section 4320 factors, Joint Statement of Issues, etc.) which were due September 8, 2025 (10 days prior to the Trial Readiness Conference) in the matter entitled, In Re Marriage of Neben, Orange County Superior Court Case No. 23D002135, Dept. L73. I was in court today on the Trial Readiness Conference. I have another court appearance this afternoon in San Diego. I am in Court tomorrow in Long Beach on a Final Status Conference.

June and July were also impacted months. I was in trial on the In Re Marriage of Schubert case three days, in five depositions over several days in connection with the Lenders Group case which was set to start trial August 4, 2025 and is trailing.

I do not believe there is prejudice to your client in the reasonable request for extension, particularly since the matter is up on appeal, the briefing is due soon, and I am granting you an extension of time to file a motion to compel, should that be necessary.

Thank you for your anticipated cooperation in this regard.

Please confirm the agreement to the requested extension.

Cecilia Preciado, Esq.  
Bohm Wildish & Matsen, LLP  
600 Anton Blvd., Suite 640  
Costa Mesa, CA 92626

---

**From:** Gustavo Gonzalez-Ramos <gustavo.gonzalez@dordicklaw.com>  
**Sent:** Thursday, September 4, 2025 9:12 AM  
**To:** James G. Bohm, Esq. <jbohm@bohmwildish.com>; Ceci Preciado <cpreciado@bohmwildish.com>  
**Cc:** Dustin Moaven Eservice List <DZMeservice@dordicklaw.com>  
**Subject:** JANE DOE VS ALKIVIADES DAVID, ET AL.

Good morning Counsel,

Enclosed, please find attached correspondence regarding the above-referenced matter.

Best Regards,

## **Gustavo Gonzalez-Ramos**

Paralegal

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[gustavo.gonzalez@dordicklaw.com](mailto:gustavo.gonzalez@dordicklaw.com)

[www.Dordicklaw.com](http://www.Dordicklaw.com)



All correspondence to: 1122 Wilshire Boulevard, Los Angeles, CA 90017

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# **EXHIBIT “F”**

**Jade Doneza**

---

**From:** Dustin Moaven <dustin@dordicklaw.com>  
**Sent:** Thursday, September 18, 2025 1:03 PM  
**To:** Ceci Preciado  
**Subject:** Automatic reply: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive

I am currently out of the office until September 22. During this time, ex parte notice to this email address will not be accepted. If you need assistance, please contact [Brittney@dordicklaw.com](mailto:Brittney@dordicklaw.com).

Thank you,

# **EXHIBIT “G”**

## Ceci Preciado

---

**From:** Ceci Preciado  
**Sent:** Thursday, September 18, 2025 1:09 PM  
**To:** brittney@dordicklaw.com  
**Cc:** Dustin Moaven; Antonia Leseth; Cynthia Lopez  
**Subject:** FW: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive  
**Attachments:** Alki David - MC letter re debtor discovery.pdf

Brittney: I sent the email below to Mr. Moaven and received a message he is out of the office until 9/22/25 directing me to your email. Please see below as the request is time sensitive based on Mr. Moaven's deadline of today to respond to his meet and confer.

Thank you.

---

**From:** Ceci Preciado  
**Sent:** Thursday, September 18, 2025 1:03 PM  
**To:** Dustin Moaven <dustin@dordicklaw.com>; Cc: Dustin Moaven Eservice List <dzmeservice@dordicklaw.com>  
**Cc:** Antonia Leseth <ALeseth@bohmwildish.com>; Jim Bohm <jbohm@aol.com>; Cynthia Lopez <clopez@bohmwildish.com>  
**Subject:** FW: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive

Mr. Moaven:

I am in receipt of your meet and confer letter. I am requesting an extension of time up to and including October 2, 2025 to address your letter and meet and confer with you in an effort to informally resolve the issues set forth in your correspondence sent September 4, 2025 regarding the Special Interrogatories and Demand for Production of Documents directed at Mr. David. I need more time to be able to address the meet and confer. **I agree to extend your motion to compel deadline the equivalent amount of time.**

As you know from my previous request for extension to respond to the subject discovery (which was denied), and from my recent applications for extension of time to file the appellate briefs on this matter (which the Court of Appeal granted), my schedule has been impacted as a result of a heavy trial schedule.

As I noted in my declaration in support of our request for extension to file the appeal brief, I am the attorney primarily responsible for the preparation of Appellant's Opening Brief in the above-referenced matter which presents an extensive time commitment. We have upcoming due dates on the briefing and Appendix.

I was in trial in Orange County Superior Court, Dept. L53 in a family law matter, In Re Marriage of Pearce, Orange County Superior Court Case No. 18D007188 for sixteen days on the following trial days: July 30, 2025, August 5, 2025, August 6, 2025, August 11, 2025, August 12, 2025, August 13, 2025, August 18, 2025, August 20, 2025, August 25, 2025 (partial day), August 27, 2025, August 28, 2025, September 9, 2025, September 10, 2025, September 11, 2025, September 12, 2025 in the afternoon and September

16, 2025 (afternoon). The evidence and argument concluded on September 16, 2025. I have been tasked by the Court to prepare the Statement of Decision on the 16-day trial by September 22, 2025. The Court has made rulings along the way during the Pearce trial, including a ruling on the conscionability of a spousal support provision in a premarital agreement pursuant to Family Code Section 1612c. On September 3, 2025, Opposing counsel requested a Statement of Decision with 27 questions. I was tasked to prepare the Statement of Decision on that issue and have it completed by September 9, 2025, which I did. I was also tasked with preparing Prevailing Party motion for fees and reply, and opposing the Family Code Section 2030 fee request which was recently completed last week.

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12, 2025.

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I am also in trial preparations compiling pre-trial documents (Exhibits, witness lists, Family Code Section 4320 factors, Joint Statement of Issues, etc.) which were due September 8, 2025 (10 days prior to the Trial Readiness Conference) in the matter entitled, In Re Marriage of Neben, Orange County Superior Court Case No. 23D002135, Dept. L73. I was in court today on the Trial Readiness Conference. I have another court appearance this afternoon in San Diego. I am in Court tomorrow in Long Beach on a Final Status Conference.

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I do not believe there is prejudice to your client in the reasonable request for extension, particularly since the matter is up on appeal, the briefing is due soon, and I am granting you an extension of time to file a motion to compel, should that be necessary.

Thank you for your anticipated cooperation in this regard.

Please confirm the agreement to the requested extension.

Cecilia Preciado, Esq.  
Bohm Wildish & Matsen, LLP  
600 Anton Blvd., Suite 640  
Costa Mesa, CA 92626

---

**From:** Gustavo Gonzalez-Ramos <[gustavo.gonzalez@dordicklaw.com](mailto:gustavo.gonzalez@dordicklaw.com)>  
**Sent:** Thursday, September 4, 2025 9:12 AM

**To:** James G. Bohm, Esq. <[jbohms@bohmwildish.com](mailto:jbohms@bohmwildish.com)>; Ceci Preciado <[cpreciado@bohmwildish.com](mailto:cpreciado@bohmwildish.com)>  
**Cc:** Dustin Moaven Eservice List <[DZMeservice@dordicklaw.com](mailto:DZMeservice@dordicklaw.com)>  
**Subject:** JANE DOE VS ALKIVIADES DAVID, ET AL.

Good morning Counsel,

Enclosed, please find attached correspondence regarding the above-referenced matter.

Best Regards,

## **Gustavo Gonzalez-Ramos**

Paralegal

### **DORDICK LAW CORPORATION**

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All correspondence to: 1122 Wilshire Boulevard, Los Angeles, CA 90017

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# **EXHIBIT “H”**

## Jade Doneza

---

**From:** Brittney Ghadoushi <brittney@dordicklaw.com>  
**Sent:** Thursday, September 18, 2025 1:41 PM  
**To:** Ceci Preciado  
**Cc:** Dustin Moaven; Antonia Leseth; Cynthia Lopez; Gustavo Gonzalez-Ramos  
**Subject:** RE: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive

Hi Ceci,

Unfortunately, we are unable to provide an extension.

Best,

## Brittney Ghadoushi

Associate Attorney

### DORDICK LAW CORPORATION

Beverly Hills • Downtown Los Angeles • Riverside

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(800) 555-5595 (310) 551-0949

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[brittney@dordicklaw.com](mailto:brittney@dordicklaw.com)

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All correspondence to: 1122 Wilshire Boulevard, Los Angeles, CA 90017

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**From:** Ceci Preciado <cpreciado@bohmwildish.com>  
**Sent:** Thursday, September 18, 2025 1:09 PM  
**To:** Brittney Ghadoushi <brittney@dordicklaw.com>  
**Cc:** Dustin Moaven <dustin@dordicklaw.com>; Antonia Leseth <ALeseth@bohmwildish.com>; Cynthia Lopez <clopez@bohmwildish.com>  
**Subject:** FW: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive

Brittney: I sent the email below to Mr. Moaven and received a message he is out of the office until 9/22/25 directing me to your email. Please see below as the request is time sensitive based on Mr. Moaven's deadline of today to respond to his meet and confer.

Thank you.

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**From:** Ceci Preciado

**Sent:** Thursday, September 18, 2025 1:03 PM

**To:** Dustin Moaven <[dustin@dordicklaw.com](mailto:dustin@dordicklaw.com)>; Cc: Dustin Moaven Eservice List <[dzmeservice@dordicklaw.com](mailto:dzmeservice@dordicklaw.com)>

**Cc:** Antonia Leseth <[ALeseth@bohmwildish.com](mailto:ALeseth@bohmwildish.com)>; Jim Bohm <[jbohm@aol.com](mailto:jbohm@aol.com)>; Cynthia Lopez <[clopez@bohmwildish.com](mailto:clopez@bohmwildish.com)>

**Subject:** FW: JANE DOE VS ALKIVIADES DAVID, ET AL.- Request for Extension to Respond to Meet and confer- Time Sensitive

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Cecilia Preciado, Esq.  
Bohm Wildish & Matsen, LLP  
600 Anton Blvd., Suite 640  
Costa Mesa, CA 92626

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**From:** Gustavo Gonzalez-Ramos <[gustavo.gonzalez@dordicklaw.com](mailto:gustavo.gonzalez@dordicklaw.com)>  
**Sent:** Thursday, September 4, 2025 9:12 AM  
**To:** James G. Bohm, Esq. <[jbohm@bohmwildish.com](mailto:jbohm@bohmwildish.com)>; Ceci Preciado <[cpreciado@bohmwildish.com](mailto:cpreciado@bohmwildish.com)>  
**Cc:** Dustin Moaven Eservice List <[DZMeservice@dordicklaw.com](mailto:DZMeservice@dordicklaw.com)>  
**Subject:** JANE DOE VS ALKIVIADES DAVID, ET AL.

Good morning Counsel,

Enclosed, please find attached correspondence regarding the above-referenced matter.

Best Regards,

**Gustavo Gonzalez-Ramos**  
Paralegal

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# **EXHIBIT “I”**



RYAN WILDISH & MATZEN

600 Anton Blvd., Ste. 640  
Costa Mesa, CA 92626  
bohmwildish.com

Cecilia Preciado, Esq.  
714.384.6500 telephone  
714.384.6501 facsimile  
cpreciado@bohmwildish.com

September 18, 2025

VIA EMAIL

Dustin Z. Moaven, Esq.  
Dordick Law Corporation  
1122 Wilshire Blvd.  
Los Angeles, CA 90017

Re: ***Jane Doe v. Alkiviades David, et. al***  
Los Angeles County Superior Court, Case No.20STCV37498

Dear Mr. Moaven:

This letter is in response to your September 3, 2025, correspondence to my office regarding your client's Request for Production of Documents (Set One) and Special Interrogatories (Set One) to Mr. Alkiviades David.

1. **Request for Extension:**

I am in receipt of your correspondence dated September 3, 2025 (received September 4, 2025).

Earlier today, I requested an extension of time to respond to your meet and confer letter which imposes a deadline of September 18, 2025 for "full and complete code-compliant amended responses and produces all responsive documents" otherwise "Plaintiff will have no choice but to move to compel and seek monetary sanctions. . ." In exchange for the extension, I agreed to continue the motion to compel deadline.

After I sent my email, I received a notification that you are not in the office until September 22, 2025, despite imposing a hard deadline of September 18, 2025, under threat of motion to compel.

I contacted Brittney as directed in your out-of-office email. Brittney responded as follows:

"Unfortunately, we are unable to provide an extension."

As noted, I agreed to extend the motion to compel deadline in exchange for the requested extension, yet the extension request was denied. This was the first extension I requested on the meet and confer. I see no prejudice against your client by granting the requested extension.

Your office similarly denied my request for a two-week extension to respond to the discovery. That was the first extension requested as well.

Your office also denied my request that you stipulate an extension for Mr. David to file his appeal brief, an extension which the Court of Appeal granted.

Dustin Moaven, Esq.  
September 18, 2024  
Page 2 of 6

I would like to direct your attention to the Superior Court County of Los Angeles Chapter Three, Civil Division, Appendix 3.A. "Guidelines for Civility in Litigation" as follows:

(a) Continuances and Extensions of Time.

(1) First requests for reasonable extensions of time to respond to litigation deadlines, whether relating to pleadings, discovery or motions, should ordinarily be granted as a matter of courtesy unless time is of the essence.

(3) A lawyer should advise clients against the strategy of granting no time extensions for the sake of appearing "tough."

In addition, I call your attention to the State Bar of California Civility Toolbox, Section 6 which provides in pertinent part, "[c]onsistent with existing law and court orders, an attorney should agree to reasonable requests for extensions of time that are not adverse to the client's interests. For example, . . . (a) Unless time is of the essence, an attorney should agree to an extension without requiring motions or other formalities, regardless of whether the requesting counsel previously refused to grant an extension."

Here, the request for a two-week extension to respond to the discovery was reasonable. The request for additional time to respond to the meet and confer was reasonable, particularly given the fact that I agreed to extend the motion to compel deadline by the same time period as the extension requested. Time is not of the essence which would impede continuance.

I would ask that you reconsider your position and consistent with the LASC and State Bar civility guidelines, grant the extension requested.

2. Your Meet and Confer Efforts.

C.C.P. Section 2016.040 imposes an obligation to conduct a "reasonable and good faith attempt at an informal resolution of each issue presented by the motion."

Your office has written one letter. The letter does not constitute a good faith meet and confer letter. It provides your client's general position followed by an ultimatum and threat to file a motion to compel. It provides in relevant part:

**"Plaintiff is hopeful this dispute can be resolved through the meet and confer process without court intervention. However, unless Defendant serves full, code-compliant amended responses and produces all responsive documents by the close of business on September 18, 2025, Plaintiff will have no choice but to move to compel and seek monetary sanctions. . ."**

Although you state you are hopeful the dispute can be resolved through the meet and confer process, your letter invites no meet and confer, you have rejected a request for extension so that a meet and confer can take place, and your letter provides an ultimatum if your demands are not complied with 100% irrespective of the other party's position.

The meet and confer process is designed to encourage parties to resolve their differences without court intervention, thereby reducing the burden on the courts and minimizing unnecessary litigation costs.

A reasonable and good faith attempt at informal resolution requires more than a superficial or perfunctory effort. A meet and confer is to involve substantive discussions such that parties "talk the matter over, compare their views, consult, and deliberate. . ." In re Marriage of Moore (2024) 102 Cal.App.5th 1275. Court have said argumentative exchanges or mere bickering do not satisfy the standard. In re Marriage of Moore (2024) 102 Cal.App.5th 1275.

**3. Mr. David's Net Worth**

Your client obtained initially (before it was modified) a jury verdict of \$800M in punitive damages against Mr. David. Unless you introduced no evidence of his net worth and still obtained an award of \$800M in punitive damages, the discovery you propounded seems designed to harass Mr. David. Please describe and provide the evidence you introduced at trial regarding Mr. David's "net worth" to support an award of punitive damages. I am unable to locate any evidence of "net worth" introduced by your office. You represented there were no exhibits introduced at trial.

**4. The Discovery is Not Narrowly Tailored.**

I respectfully disagree with your position that your client's discovery is "narrowly tailored." It is overbroad, encompasses "ALL DOCUMENTS," and with limited exception seeks information for a 10 year period.

You claim information concerning defendant's assets, liabilities, income and ability to satisfy a valid judgment is directly relevant and reasonably calculated to lead to the discovery of admissible evidence. However, you went well above and beyond that. Further, the scope of discovery in a judgment debtor context is different from the scope of discovery pre-trial.

**5. The Definition of "YOU" and "YOUR" in the Discovery**

Thank you for modifying your definition of "YOU" and "YOUR" to mean and refer solely to Defendant Alkiviades David. As you know, the definition of "YOU" and "YOUR" in your discovery was overbroad and vague and ambiguous, and hence, the need for the objection. Your discovery provided as follows:

"YOU" and "YOUR" as used herein, includes and collectively refers to Defendant ALKIVIADES DAVID, including Defendant ALKIVIADES DAVID's agents, representatives, investigators, employees, contractors, insurance companies, third-party adjusting administrators, as well as said entities' predecessors in interest, their agents, their employees, their investigators, their representatives, their insurance companies, and anyone else acting on behalf of Defendant ALKIVIADES DAVID, save for his attorneys."

**6. The Interrogatories and Demand for Production Seeking Information Over a 10 Year Period are Overbroad as to Time**

Twenty-five (25) out of thirty-five (35) of the special interrogatories seek information going back 10 years. (Special Interrogatory Nos. 1, 2, 4, 6, 7, 8 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 22, 25, 26, 27, 28, 29, 34.

Similarly, thirty-one (31) out of thirty-five (35) of the Demand for Production of Documents seek information going back 10 years. (Special Interrogatory Nos. 1, 2, 4, 6, 7, 8 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 22, 25, 26, 27, 28, 29, 34.

Mr. David objected on the ground that the time period requested is overbroad and as such the interrogatories seek information which is not relevant, that is, not calculated to aid in the enforcement of a money judgment.

Your letter does not address how information 10 years old is calculated to aid in the enforcement of a money judgment today. What if an asset existed 10 years ago, but was sold for example, 9.5 years ago? How is that helpful? The ten-year period is overbroad.

Discovery that is overly broad or unrelated to the judgment debtor's assets may be deemed improper. See Finance Holding Co. LLC v. The American Institute of Certified Tax Coaches (2018) 29 Cal.App.5th 663. In Finance Holding, the court declined to affirm an overly broad discovery order. This principle ensures that discovery remains focused on its statutory purpose and does not become a tool for unwarranted intrusion into financial records. In Finance Holding, the Court of Appeal held that a trial court's order compelling the production of all business, tax, and bank records for a five-year period exceeded the statutory scope of discovery. The court emphasized that discovery must be limited to documents relevant to the judgment debtor's assets or debts and cannot be overly broad. Id.

If you have case authority to support your position that going back 10 years is appropriate in a case such as this, please provide the citation. I will gladly consider it.

We are requesting that you limit the temporal scope of your discovery.

I am amenable to discuss this issue with you.

**7. The Discovery Propounded is Overbroad as to Scope**

The discovery must be limited to information which will assist in the aid of enforcement of a judgment. All 35 of the Demand for Production requests ask for "ALL DOCUMENTS." That is way too broad, burdensome and oppressive and should be narrowly tailored. Finance Holding Co. LLC v. The American Institute of Certified Tax Coaches (2018) 29 Cal.App.5th 663.

**8. The Attorney-Client Privilege Objection**

The attorney-client privilege objection was triggered by the fact that the demands and interrogatories are beyond overbroad and potentially encompass privileged communications. I do not read C.C.P. Section 2031.240(c)(1) as requiring a privilege log. The statute says that sufficient factual information is to be provided so you can evaluate the privilege. Here, however, we need to start with narrowing the scope of your questions and demands because otherwise, it could take months to hunt down the totality of information you are requesting, including contacting attorneys who have represented Mr. David over the last ten years. What you are asking is simply not reasonable.

**9. The Attorney Work Product Objection**

Again, the attorney work-product objection was triggered by necessity given the fact that your client's discovery is so broad. I agree that a deed, a bank statement, a mortgage statement would not be work product. However, if you examine your discovery requests, you well way beyond asking for those types of documents. You asked for "ALL DOCUMENTS EVIDENCING. . ." "ALL DOCUMENTS RELATED TO. . ."

I would urge you to go back and review how you defined "DOCUMENT" and how you defined "EVIDENCING", and how you defined "RELATED TO" in your definitions. The definitions are so broad that the demand would include, for example, a voice message from an attorney giving the client advice regarding a real property the client owns. Your discovery

is that overbroad. Again, I request that you limit the discovery. The same goes for the attorney-client privilege.

#### **10. The Privacy Objection**

Again, your discovery is so broad that it triggers the right of privacy of third parties. You do not address this in your meet and confer. You only focus on Mr. David's privacy. The trustor would have a right of privacy in his trust where Mr. David might be a beneficiary for example. You ask for joint accounts. If joint accounts exist, there is a right of privacy of the other joint account holder. (RPD No. 1) You ask for financial instruments held jointly with others or a business. (RPD No. 2) There are third-party privacy rights implicated. You ask for all trusts in which he is or has been a beneficiary. (RPD No. 6) Third party privacy rights are implicated there. You ask for ALL DOCUMENTS EVIDENCING jointly owned property. The demand is so broad that third party's financial information is implicated. You ask for ALL DOCUMENTS EVIDENCING any trust, estate, or inheritance from which he expects to receive an inheritance. (RPD 10) Third party privacy rights are implicated there. These are just a few examples.

With respect to Mr. David's privacy rights, he has protected privacy rights, particularly going back ten years if that information has no bearing on your ability to collect a judgment for example. While the judgment debtor statute may make discovery of current assets relevant, it does not authorize discovery of every shred of paper in existence in Mr. David's financial or personal affairs for the last ten years. The discovery must be reasonably tailored.

#### **11. Much of Your Discovery is Duplicative**

Much of the discovery you propounded is duplicative. For example, you ask for a general category, and then you ask another request that is a bit narrower but would fall within the general category.

#### **12. The Interrogatories**

I do not believe the Deyo v. Kilbourne case is particularly helpful in this post-judgment matter. The discovery permitted is based on a different standard and there are separate statutes that govern that fall outside the pre-trial discovery.

Many of your interrogatories are compound and deficient as pointed out. Your letter fails to address those issues.

In conclusion, I would ask that you take another look at the discovery you propounded, take a look at the overbreadth of the definitions of the terms used in the discovery and that you limit it so that it is narrowly tailored to the purpose for which the discovery is permitted. I am happy to have a phone call with you to further discuss the concerns and issues pertaining to the discovery to avoid law and motion. Let me know if you are open to such a discussion.

Dustin Moaven, Esq.  
September 18, 2024  
Page 6 of 6

Thank you for your attention to this matter.

Very truly yours,

BOHM WILDISH & MATSEN, LLP.

  
CECILIA PRECIADO, ESQ.

Cc: Client

**Ceci Preciado**

---

**From:** Ceci Preciado  
**Sent:** Thursday, September 18, 2025 6:04 PM  
**To:** Dustin Moaven  
**Cc:** Brittney Ghadoushi; Cc: Dustin Moaven Eservice List; Jim Bohm; Cynthia Lopez; Antonia Leseth  
**Subject:** Jane Doe v. David-Meet and Confer Correspondence  
**Attachments:** 2025.09.18 Ltr to Moaven.pdf

Tracking:	Recipient	Delivery	Read
	Dustin Moaven		
	Brittney Ghadoushi		
	Cc: Dustin Moaven Eservice List		
	Jim Bohm		
	Cynthia Lopez	Delivered: 9/18/2025 6:01 PM	
	Antonia Leseth	Delivered: 9/18/2025 6:01 PM	Read: 9/19/2025 8:45 AM

Please see correspondence of today's date.

Thank you

**Cecilia Preciado**

Partner | BOHM WILDISH & MATSEN, LLP  
600 Anton Blvd., Suite 640 | Costa Mesa, CA 92626  
T: [714.384.6500](tel:714.384.6500) | F: [714.384.6501](tel:714.384.6501) | W: [bohmwildish.com](http://bohmwildish.com)

**PLEASE NOTE: as of June 1, 2022, our office moved to 600 Anton Blvd, Ste 640, Costa Mesa, CA 92626**

CONFIDENTIALITY NOTICE: This e-mail message may contain legally privileged and/or confidential information. If you are not the intended recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If you have received this message in error, please notify the sender immediately and delete this e-mail message from your computer.

From: Alki David <filmonpersonal@gmail.com>  
Sent: 14 October 2025 13:36  
To: Rebecca Hume  
Cc: Ajay Fournillier; legal@swissx.com; Boniswa Dzere  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

---

## 1. “On Record” = Constructive and Confirmed Service

Once the **N215 Certificate of Service** and accompanying affidavit have been:

- **Filed with the Court** (KB-2025-001991),
- **Copied to the opposing party’s known email**, and
- **Acknowledged**

under **CPR 6.17** and **CPR 6.27**, the court treats them as **properly served**.

I think that is the end of this matter.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

Alki David  
Founder & CEO Anakando Ltd.

Anakando Media Group <http://www.ANAKANDO.com>

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<http://www.Shockya.com>

The information contained in this message may be privileged. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thanks!

On Thu, Oct 9, 2025 at 6:45 AM Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)> wrote:

Dear Mr. David,

We acknowledge receipt of your three emails dated today's date timed at 12.10, 12.14 and 12.38 UK time.

We note that despite Ms. Hume, Mr. Fournillier and Howard Kennedy LLP having not received any documents which you allege were served by a Mr. Walsh, you maintain that there is an affidavit of service as well as CCTV and delivery logs

evidencing the same (your email timed at 12.14 today). Please provide a copy of the affidavit of service to which you refer together with all evidence of the alleged service including details of where service is alleged to have occurred, confirmation of who Mr. Walsh works for and evidence that he is a process server.

Other than the electronic copies of the form N215 and a document purporting to be a motion in the Antigua proceedings sent by email to us on 8 October 2025 at 23.26 we have not been served with or received any hard copy documents from you

In the circumstances we do not accept any personal service has been effected on Ms. Hume, Mr. Fournillier and this firm and take the allegations that any service has been effected extremely seriously. We reserve all rights.

Yours faithfully

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP

t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980

[rebecca.hume@howardkennedy.com](mailto:rebecca.hume@howardkennedy.com)

[Stay in touch](#) ↗

---

**From:** Alki David <[filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com)>

**Sent:** Thursday, October 9, 2025 12:14 PM

**To:** Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)>

**Cc:** Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)>; Power, Benjamin | He/His

<[Benjamin.Power@justice.gov.uk](mailto:Benjamin.Power@justice.gov.uk)>; KB Judges Listing Office <[KBJudgesListingOffice@justice.gov.uk](mailto:KBJudgesListingOffice@justice.gov.uk)>; Morgan, June

<[june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)>; [legal@swissx.com](mailto:legal@swissx.com); Boniswa Dzere <[Boniswa.Dzere@howardkennedy.com](mailto:Boniswa.Dzere@howardkennedy.com)>;

[legalaffairs@ab.gov.ag](mailto:legalaffairs@ab.gov.ag); [international.justice@cps.gov.uk](mailto:international.justice@cps.gov.uk); [kb.enquiries@justice.gov.uk](mailto:kb.enquiries@justice.gov.uk)

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy

SwissX Island Authority – Antigua & Barbuda

Oct 9th 2025

---

**Subject:** Confirmation of Service and Rebuttal of Denial – Legal Notice

Dear Ms. Hume, Mr. Fournillier, and Counsel at Howard Kennedy LLP,

I acknowledge receipt of your response dated [insert date], in which you deny that service was effected by **Mr. Martin Walsh** at 1:30 p.m. UK time.

Please note for the record that **lawful and verifiable service did in fact take place** in accordance with international civil procedure and relevant rules governing cross-border service, including the **Hague Service Convention**. Mr. Walsh is a duly retained and qualified independent process server acting under affidavit, and his certificate of service—bearing witness to time, date, and recipients—is being filed contemporaneously with

the relevant courts in **Antigua & Barbuda**, as well as within the **High Court of Justice, King's Bench Division (UK)**.

You are reminded that **denial of receipt does not invalidate lawful service**, especially where service has been executed in good faith, supported by affidavit, and delivered to designated premises and/or named individuals under instruction. Independent verification, including CCTV and delivery logs, will be presented to confirm this.

For avoidance of doubt:

- **Service is complete** as of 1:30 p.m. UK time on the stated date.
- **Supplementary service** and republication will occur in parallel via registered electronic means, including public notice and international filing platforms, to ensure full transparency.
- Your continued refusal to acknowledge lawful service will be noted for judicial consideration and may result in **default determinations** or **adverse procedural findings**.

All materials, including the affidavit of Mr. Walsh and proof of posting, will be **resubmitted and re-served** for your convenience, with copies lodged both with the court registry and the Antigua Office of the Attorney General.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda

No.1 London Bridge London SE1 9BG

[www.howardkennedy.com](http://www.howardkennedy.com)

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---

From: Alki David <filmonpersonal@gmail.com>  
Sent: 14 October 2025 13:54  
To: Rebecca Hume  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June; legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004  
Attachments: EXHIBIT - AV.mp4

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## **SUPPLEMENTAL STATEMENT TO THE HONOURABLE MRS JUSTICE STACEY**

**IN THE HIGH COURT OF JUSTICE – KING’S BENCH DIVISION**

**Claim No. KB-2025-001991**

**Between:**

**MAHIM KHAN – Claimant**

**and**

**ALKIVIADES DAVID – Defendant / Applicant**

---

### **1. Recognition of Disability Status**

The Defendant is a registered disabled litigant, formally recognised by **The Honourable Mr Justice Cotter J** on **25 July 2025**, acknowledging his **traumatic brain injury (TBI)** and the need for reasonable adjustments under **Sections 20–21 of the Equality Act 2010**.

These accommodations include remote appearance and advance notice of all listings.

---

### **2. Misuse of Disability Information and Financial Vulnerability**

Following that hearing, the Defendant became aware that details of his disability and medical condition were **used wrongfully and prejudicially**, contrary to the **Equality Act 2010** and the **Data Protection Act 2018**. It appears that this information was circulated by **Howard Kennedy LLP** and/or their representatives without lawful authority or consent.

The Defendant also places on record that he is presently of **limited financial means**, relying on **temporary government assistance in Antigua and Barbuda** and **handouts from friends** for daily living and legal expenses.

The misuse of his disability status and financial hardship to gain procedural advantage constitutes an **abuse of process** and an affront to the principle of equal access to justice.

---

### **3. Personal Hardship, Animal Welfare, and Unlawful Withholding of Funds**

The Defendant resides at an **animal sanctuary** in Antigua that cares for **over 200 rescued animals**, many of which depend on him for food, shelter, and veterinary care.

Because funds belonging to him – held through **Revolut Bank** and under the control of **Rebecca Hume of Howard Kennedy LLP** – have been **unlawfully withheld**, he is now **struggling to provide food and basic care** for these animals and cannot afford urgent medical and dental treatment (a bridge has fallen out, leaving him unable to eat properly).

These funds were earmarked to sustain his subsistence and legal expenses throughout the present proceedings. Their continued detention is causing **genuine suffering, financial deprivation, and humanitarian harm**. The Defendant respectfully requests that this Honourable Court take **judicial notice** of his hardship and order an **immediate inquiry and release of the withheld monies**.

---

#### 4. Request for Judicial Protection

The Defendant respectfully requests that this Honourable Court –

1. **Reaffirm** the disability accommodations previously ordered by Mr Justice Cotter J;
  2. **Prohibit** further reference to or use of the Defendant’s medical or financial information by opposing counsel without prior judicial permission;
  3. **Direct** that any future filings containing sensitive personal data be handled **under seal** or in **closed session**; and
  4. **Recognise the Defendant’s ongoing hardship** and **order the immediate release** of the unlawfully withheld funds necessary for his welfare, health care, and sanctuary operations.
- 

#### 5. Exhibit AV – Video Evidence

A short video documentary titled “**SwissX Island Project and Animal Sanctuary – Antigua & Barbuda**” is submitted as **Exhibit A**, showing the Defendant’s ecological and humanitarian work and the impact of financial hardship on the animals and community projects he supports.

A secure view-only link to the video file is provided in the accompanying cover email and may be treated as part of the record for judicial review.

---

#### 6. Reservation of Rights

The Defendant reserves all rights under the **Equality Act 2010**, the **Data Protection Act 2018**, and **Article 8 of the European Convention on Human Rights** to seek appropriate remedies for any misuse of personal information and for the unlawful interference with his property and welfare.

---

Respectfully submitted,  
**Digitally Signed / s/ H.E. Alkiviades David**  
Ambassador-at-Large for the Green Economy (Antigua & Barbuda)  
Chairman, SwissX Sovereign Wealth Fund  
Date: 14 October 2025

---

**.MP4**

**EXHIBIT - AV**

**11.09 MB**

From: Alki David <filmonpersonal@gmail.com>  
Sent: 14 October 2025 16:52  
To: Rebecca Hume; chiefclerk.kb@justice.gov.uk  
Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June;  
Cc: legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk;  
kb.enquiries@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref:  
061414.00004

---

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION  
Claim No: KB-2025-001991  
BETWEEN: MAHIM KHAN (Claimant)  
AND ALKIVIADES DAVID (Defendant)**

---

## **LETTER TO THE COURT – SUBMISSION OF ANTIGUAN EVIDENTIARY BUNDLE**

**To:** The Hon. Mrs Justice Stacey  
High Court of Justice, King's Bench Division  
Royal Courts of Justice, Strand, London WC2A 2LL

**Cc:** Howard Kennedy LLP – Solicitors for the Claimant

**From:** Alkiviades David, Defendant in Person

**Date:** October 13th 2025

---

My Lady,

1. Further to the Defendant's *Supplemental Notice Regarding the Antiguan Proceedings*, I respectfully enclose for the Court's record a digital archive entitled "**Antigua\_Evidentiary\_Bundle\_2025\_Sealed.zip.**"
2. This archive contains the complete, paginated and sealed bundle accepted by the **Eastern Caribbean Supreme Court, High Court of Justice (Antigua & Barbuda)** in Claim No. **ANUHCV 2025/0149**. The record has been formally entered on that Court's docket and forms part of a sovereign proceeding now under way.
3. The Defendant does not invite this Honourable Court to make findings on the underlying allegations but submits the bundle for judicial notice under principles of comity, as the materials bear directly on the credibility and background of certain corporate and individual actors connected to these proceedings.
4. The Defendant accordingly requests that this Court acknowledge receipt of the archive and consider inviting an **amicus curiae** submission from the **Attorney General of Antigua & Barbuda** confirming the authenticity and status of the Antiguan record.
5. A certified copy of the archive is held securely by the Defendant and can be produced for inspection upon direction of the Court.

I thank Your Ladyship for kind attention to this submission.

Respectfully submitted,

ALKI DAVID

---

[digital signature]

**Alkiviades David**

Defendant in Person

Email: [legal@swissx.com](mailto:legal@swissx.com) Tel: +1268 780 4133

 [ANU COURT CaseInfo \(5\).zip](#)

**Attachment:** Antigua\_Evidentiary\_Bundle\_2025\_Sealed.zip

**Enclosure:** Supplemental Notice Regarding the Antiguan Proceedings (PDF)

---

From: Rebecca Hume  
Sent: 14 October 2025 19:28  
To: alki@filmon.com  
Cc: Ajay Fournillier; legal@swissx.com; Boniswa Dzere  
Subject: RE: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

---

Dear Mr. David,

We note your refusal to provide a copy of the affidavit of service to which you refer or any other evidence of alleged service.

The certificate of service to which you refer does not prove service, it is a statement regarding service of proceedings commenced in England and Wales which is required to be signed by the party filing the certificate or their solicitors. Notwithstanding that no documents have been served, and you have provided no evidence of service despite alleging you have evidence, we are not aware that any proceedings have been commenced by you in England and Wales against Ms. Hume, Mr. Fournillier or Howard Kennedy LLP.

The motion attached to your email dated 8 October 2025 refers to the existing proceedings in Antigua and Barbuda to which none of Ms. Hume, Mr. Fournillier or Howard Kennedy LLP are parties.

We invite you again to provide evidence of service and reserve the right to produce a copy of this correspondence to the court.

Yours faithfully

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP

t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980

rebecca.hume@howardkennedy.com

[Stay in touch](#) 

---

**From:** Alki David

**Sent:** Tuesday, October 14, 2025 1:36 PM

**To:** Rebecca Hume

**Cc:** Ajay Fournillier ; legal@swissx.com; Boniswa Dzere

**Subject:** Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

## 1. “On Record” = Constructive and Confirmed Service

Once the **N215 Certificate of Service** and accompanying affidavit have been:

- **Filed with the Court** (KB-2025-001991),
- **Copied to the opposing party’s known email**, and
- **Acknowledged**

under **CPR 6.17** and **CPR 6.27**, the court treats them as **properly served**.

I think that is the end of this matter.

[www.ANAKANDO.com](http://www.ANAKANDO.com)

Alki David  
Founder & CEO Anakando Ltd.

Anakando Media Group <http://www.ANAKANDO.com>

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The information contained in this message may be privileged. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. Thanks!

On Thu, Oct 9, 2025 at 6:45 AM Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)> wrote:  
Dear Mr. David,

We acknowledge receipt of your three emails dated today's date timed at 12.10, 12.14 and 12.38 UK time.

We note that despite Ms. Hume, Mr. Fournillier and Howard Kennedy LLP having not received any documents which you allege were served by a Mr. Walsh, you maintain that there is an affidavit of service as well as CCTV and delivery logs evidencing the same (your email timed at 12.14 today). Please provide a copy of the affidavit of service to which you refer together with all evidence of the alleged service including details of where service is alleged to have occurred, confirmation of who Mr. Walsh works for and evidence that he is a process server.

Other than the electronic copies of the form N215 and a document purporting to be a motion in the Antigua proceedings sent by email to us on 8 October 2025 at 23.26 we have not been served with or received any hard copy documents from you

In the circumstances we do not accept any personal service has been effected on Ms. Hume, Mr. Fournillier and this firm and take the allegations that any service has been effected extremely seriously. We reserve all rights.

Yours faithfully

Howard Kennedy LLP

**Rebecca Hume**

Partner | Howard Kennedy LLP  
t: +44 (0)20 3755 5696 | m: +44 (0)7355 673 980  
[rebecca.hume@howardkennedy.com](mailto:rebecca.hume@howardkennedy.com)

[Stay in touch](#)

---

**From:** Alki David <[filmonpersonal@gmail.com](mailto:filmonpersonal@gmail.com)>

**Sent:** Thursday, October 9, 2025 12:14 PM

**To:** Rebecca Hume <[Rebecca.Hume@howardkennedy.com](mailto:Rebecca.Hume@howardkennedy.com)>

**Cc:** Ajay Fournillier <[Ajay.Fournillier@howardkennedy.com](mailto:Ajay.Fournillier@howardkennedy.com)>; Power, Benjamin | He/His <[Benjamin.Power@justice.gov.uk](mailto:Benjamin.Power@justice.gov.uk)>; KB Judges Listing Office <[KBJudgesListingOffice@justice.gov.uk](mailto:KBJudgesListingOffice@justice.gov.uk)>; Morgan, June <[june.morgan2@justice.gov.uk](mailto:june.morgan2@justice.gov.uk)>; [legal@swissx.com](mailto:legal@swissx.com); Boniswa Dzere <[Boniswa.Dzere@howardkennedy.com](mailto:Boniswa.Dzere@howardkennedy.com)>;

**H.E. ALKIVIADES DAVID**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda  
Oct 9th 2025

---

**Subject:** Confirmation of Service and Rebuttal of Denial – Legal Notice

Dear Ms. Hume, Mr. Fournillier, and Counsel at Howard Kennedy LLP,

I acknowledge receipt of your response dated [insert date], in which you deny that service was effected by **Mr. Martin Walsh** at 1:30 p.m. UK time.

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- **Supplementary service** and republication will occur in parallel via registered electronic means, including public notice and international filing platforms, to ensure full transparency.
- Your continued refusal to acknowledge lawful service will be noted for judicial consideration and may result in **default determinations** or **adverse procedural findings**.

All materials, including the affidavit of Mr. Walsh and proof of posting, will be **resubmitted and re-served** for your convenience, with copies lodged both with the court registry and the Antigua Office of the Attorney General.

Sincerely,

**H.E. Alkiviades David**

Ambassador-at-Large for the Green Economy  
SwissX Island Authority – Antigua & Barbuda

No.1 London Bridge London SE1 9BG

[www.howardkennedy.com](http://www.howardkennedy.com)

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From: Alki David <filmonpersonal@gmail.com>  
Sent: 15 October 2025 10:43  
To: Rebecca Hume  
Cc: Ajay Fournillier; Power, Benjamin | He/His; KB Judges Listing Office; Morgan, June; legal@swissx.com; Boniswa Dzere; legalaffairs@ab.gov.ag; international.justice@cps.gov.uk; kb.enquiries@justice.gov.uk; chiefclerk.kb@justice.gov.uk  
Subject: Re: Listing Details - Hearing 09/10/25 - KB-2025-001991 - Mahim Khan v Alki David - our ref: 061414.00004

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The Honourable Mrs. Justice Stacey  
High Court of Justice  
King's Bench Division  
Royal Courts of Justice  
Strand, London WC2A 2LL

Re: *Claim No. KB-2025-001991 – Mahim Khan v. Alkiviades David*

## Statement of Alkiviades David Ahead of Hearing – 15 October 2025 2.00 PM

To: The Honourable Mrs Justice Stacey, King's Bench Division, High Court of Justice (London)  
Cc: The Honourable Judge Cotter – Special Master (Oversight and Coordination)

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### Purpose of this Statement

This statement is submitted in advance of the hearing on 15 October 2025. I appear *pro se*, disabled but resolute, to explain the background to the contempt allegations and to place before the Court the evidence and procedural context already on record.

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### Declaration of Innocence

I remain innocent of any wrongdoing alleged in these or related matters. The evidence already filed—including sworn affidavits, text-message transcripts, and the Antigua High Court record—shows that false material and procedural misuse have damaged both my reputation and my lawful enterprises.

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### Falsified Testimonies and Evidence Manipulation

The sworn statements of **Yelena Calendar** and **Gary Shoefield** were, as they have since confirmed by affidavit, altered and misrepresented in prior proceedings. The same network of opposing counsel used that falsified material to sustain fabricated pleadings in multiple jurisdictions.

My former lawyers – **Robert Shapiro**, **Louis Freeh**, and **Fred Heather** – withheld exculpatory information, worsening the injustice and contributing to the harm now before this Court.

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### Conflict of Interest and Misappropriation of Family Funds

Evidence already on file details a financial and professional relationship between **Mr Louis Freeh** and **Mr Dani Peretz**, my estranged brother-in-law, who is under investigation in several jurisdictions for alleged misappropriation of family funds. Records show that part of those funds was used to finance activities affecting

these proceedings. If verified, this constitutes a serious conflict of interest and breach of duty. Multiple police and regulatory authorities have acknowledged receipt of my reports and opened active case files.

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## Context and International Proceedings

The related Antigua proceedings have yielded default findings of fraud and suppression and a pending judgment order of approximately USD 10 billion. The Government of Antigua and Barbuda has confirmed publicly that I was wrongly added to the *Alpha Nero* litigation, a position later vindicated by a U.S. federal ruling.

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## Personal Safety and Medical Clarification

There have been documented threats to my safety and attempts to place me under involuntary psychiatric holds without clinical basis. I live with a traumatic brain injury, a physical disability that affects processing speed but not mental competence. I continue to comply with all orders to the best of my ability.

---

## Declaration of Innocence and Request for Restitution

Each accusation against me originates from the same interconnected group of legal and media interests. Their coordinated actions destroyed family reputation, froze lawful assets, and obstructed humanitarian work through SwissX. I request the full restoration of property and revenues unlawfully withheld.

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## SwissX Island Network and Legitimate Enterprise

The **SwissX Island Network (SIN)** is a lawful enterprise based in Antigua & Barbuda integrating renewable-energy production, carbon-credit registries, sustainable agriculture, and media distribution under a regulated sovereign-wealth framework. Its media arm operates:

- [Shockya.com](#) \* [TVMix.com](#) \* [SwissXTV.com](#) \* [FilmOn.com](#) \* [DeepRoots.news](#) \* [FluxDaily.news](#) \* [EchoSphere.news](#) \* [MetaWorld.media](#) \* [Quanta.report](#)

These outlets lawfully syndicate cultural and investigative reporting worldwide. Through the **SwissX Sovereign Wealth Fund**, audited by KPMG and BDO, the Network supports indigenous equity and environmental regeneration across partner nations.

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## Intellectual Property and Cultural Works

The same adversarial interests have interfered with my intellectual-property catalogue, including **HologramUSA** patents and productions involving **Maria Callas**, **Whitney Houston**, and **Roy Orbison**. These works were developed and exhibited under my ownership before being re-branded by affiliated entities using variants of my mark *Proto*. Counsel linked to **Gary A. Dordick**, whose firm obtained the disputed USD 900 million order, have blocked consolidation of these IP assets. I request that the Court preserve them under judicial protection and include them in any restitution review.

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## Corporate Conduct and Global Concerns

Filings in Antigua and the United States raise questions about large media conglomerates' control of digital platforms and their monetisation of harmful or unlawful content. These issues underscore the need for independent judicial and regulatory oversight. Public-record documentation is archived on [CBSYOUSUCK.com](https://CBSYOUSUCK.com) under lawful press-freedom protections.

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## **Pattern of Contempt Proceedings**

The repeated efforts to bring me before contempt proceedings—here and abroad—constitute an abuse of process. They form part of a pattern in which opposing counsel and affiliated media interests employ procedural sanctions as weapons of attrition rather than tools of compliance. I have obeyed every direction within my means and disclosed all relevant material. Independent legal observers have noted that these proceedings appear coordinated among large commercial entities. What is styled as contempt is in truth the continuation of a campaign of coercive litigation. I ask the Court to view the current allegations as evidence of procedural abuse, not defiance.

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## **Requested Relief**

1. **Suspend the present contempt proceedings** pending a full evidentiary and procedural review.
  2. **Order the return of property, assets, and intellectual-property rights** wrongfully withheld or transferred.
  3. **Refer the record and evidence** to competent criminal and regulatory authorities in the UK, US, and Antigua for any investigation they deem appropriate.
- 

## **Closing Declaration**

I appear before this Court with respect for its authority and with faith that equity and truth will prevail. I seek not indulgence but fairness: a chance to clear my name, to recover what was lawfully mine, and to end years of retaliatory litigation. I trust that Your Honour and Judge Cotter will consider this statement and the evidence on file fully and impartially.

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**Digitally Signed:** Alkiviades David

**Date:** 15 October 2025

Alkiviades A. David

Ambassador-at-Large for the Green Economy (Antigua & Barbuda)  
Chairman, SwissX Sovereign Wealth Fund