



# IN THE HIGH COURT OF JUSTICE

Submitted Date: 15/09/2025 10:33

Filed Date: 15/09/2025 10:35

Antigua and Barbuda  
Claim No: ANUHCV2025/0149

Fees Paid: 22.00

Between:  
**Alkiviades David** – Claimant  
and  
**David Boies et al.** – Defendants

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## NOTICE OF MOTION (URGENT APPLICATION)

TO THE REGISTRAR AND ALL DEFENDANTS:

TAKE NOTICE that the Claimant, **Alkiviades David**, will apply to the Honourable **Justice Rene Williams** at the High Court of Justice, Antigua & Barbuda, for an urgent hearing of his Application for **Summary Judgment** pursuant to Part 15 of the Civil Procedure Rules (Revised 2023).

The application is marked **URGENT** for the following reasons:

1. The First Defendant, **Shari Redstone**, has been duly served in London and New York since April 2025, and has **twice defaulted** in responding.
2. During this period of default, she proceeded to complete the **\$8.4 billion Skydance merger**, demonstrating deliberate disregard for the jurisdiction of this Honourable Court.
3. The continuing misconduct of the served Defendants, coupled with the systemic abuse already documented in the pleadings, represents an ongoing threat to the Claimant's rights and the sovereignty of Antigua & Barbuda.
4. Delay in resolving this application risks further prejudice, given the Defendants' capacity for manipulation of procedure and resources.

The Claimant therefore respectfully requests that this Honourable Court list this matter for **urgent hearing** at the earliest available date.

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# DRAFT ORDER

**BEFORE:** The Honourable Justice Rene Williams

**DATE:** [To be inserted by the Court]

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## ORDER

UPON the Application of the Claimant dated 15 September 2025 for Summary Judgment pursuant to Part 15 of the Civil Procedure Rules (Revised 2023);

AND UPON reading the Claim Form, Statement of Claim, Affidavit evidence, Exhibits (including publications Shockya.com, TVMix.com, DeepRoots.news), and the written submissions filed herein;

AND UPON noting that certain Defendants, including the First Defendant, **Shari Redstone**, have been duly served and are in default of filing a defence;

AND UPON further noting that during the very period in which she was under service (April–September 2025), the First Defendant proceeded to complete the **\$8.4 billion Skydance merger**, thereby demonstrating deliberate disregard of this Honourable Court’s jurisdiction;

AND UPON noting that service on the **executive members of the United Progressive Party (UPP)** has not yet been perfected;

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## IT IS HEREBY ORDERED THAT:

1. **Summary Judgment** be entered in favour of the Claimant against the duly served Defendants, including the First Defendant, Shari Redstone, pursuant to **CPR 15.2**, on the basis that they have no real prospect of successfully defending the claim and there is no other compelling reason for a trial.
2. The Court notes as an aggravating factor that the First Defendant deliberately proceeded with the \$8.4 billion Skydance merger while under service of these proceedings, thereby showing contempt for the process of this Honourable Court.
3. The quantum of damages, equitable relief, and costs shall be set down for a later hearing.
4. The Claimant’s publications (*Shockya.com*, *TVMix.com*, *DeepRoots.news*) and accompanying exhibits shall stand as admissible supporting evidence of the Defendants’ defaults, misconduct, and systemic abuse of process.
5. As to the unserved Defendants, namely the executive members of the **United Progressive Party (UPP)**:

a. The Claimant is granted **leave to serve the UPP executive members by alternative means**, including by:

- o (i) service on the Party's registered office or headquarters; and/or
- o (ii) publication of a Notice of Proceedings in the **Antigua Observer** newspaper.

b. The following text shall be deemed good and sufficient service of the Claim Form and all subsequent documents upon the UPP executive members when published in the Antigua Observer:

**NOTICE OF PROCEEDINGS**

Eastern Caribbean Supreme Court  
High Court of Justice – Antigua & Barbuda  
Claim No: ANUHCV2025/0149

Between: **Alkiviades David** (Claimant)

and

**David Boies, Gloria Allred, Dani Peretz, Shari Redstone, Daphne Barak, Michael Avenatti, Tom Girardi, Black Cube Ltd., LimeWire NFT Holdings, Edgar Bronfman Sr. (Deceased), John Branca, John McClain, United Progressive Party executive members, and Does 1–100** (Defendants).

TAKE NOTICE that proceedings have been issued in this Honourable Court against you. A copy of the Claim Form and supporting documents may be obtained from the High Court Registry, St. John's, Antigua.

If you wish to defend these proceedings, you must file an Acknowledgment of Service within 14 days of this publication. Failure to do so may result in judgment being entered against you without further notice.

6. The costs of this Application shall be costs in the cause.

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**BY THE COURT**

The Honourable Justice Rene Williams  
Dated this 15th day of September 2025

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**Respectfully submitted,**  
**Alkiviades David**

Claimant

15 September 2025

*Signed electronically: Alkiviades David*

