

**IN THE HIGH COURT OF JUSTICE
EASTERN CARIBBEAN SUPREME COURT – ANTIGUA &
BARBUDA**

Claim No. ANUHCV2025/0149

FURTHER SUBMISSION ON MISREPRESENTATION AND PRIOR NOTICE

(Howard Kennedy LLP / Rebecca Hume / Ajay Fournillier)

This submission is filed to assist the Court in assessing inaccuracies contained in the letter of Howard Kennedy LLP dated 7 January 2026. The Claimant places on record that Howard Kennedy LLP had prior and repeated notice of the Antigua proceedings through service attempts acknowledged in October 2025 and completed service in England in December 2025.

Further, Howard Kennedy LLP falsely represented to this Honourable Court that the Claimant exhausted appeals to the Supreme Court of the United States. No such appeal occurred. The U.S. proceedings never left the California civil circuit and no certiorari was granted or considered.

These inaccuracies materially affect credibility and jurisdictional considerations and are respectfully brought to the Court's attention for record and assessment.

FURTHER COURT NOTE – PARALLEL ENFORCEMENT PROCEEDINGS (ENGLAND)

(Howard Kennedy LLP / TPDO Proceedings – Claim No. KB-2025-001991)

The Claimant respectfully places on record a material procedural development arising in the parallel enforcement proceedings in England conducted by Howard Kennedy LLP.

On 19 January 2026, Senior Master Cook of the High Court of Justice (King's Bench Division) adjourned the hearing of the Claimant's Third Party Debt Order application in Claim No. KB-2025-001991 to the first available date after 19 February 2026, with costs reserved.

Howard Kennedy LLP are the solicitors on record pursuing that enforcement application.

This development is respectfully brought to the attention of this Honourable Court because:

- 1 It confirms Howard Kennedy LLP are actively engaged as enforcement solicitors in proceedings directly connected to matters raised before this Court.
- 2 It further contradicts representations previously made by Howard Kennedy LLP minimising or distancing parallel proceedings.
- 3 It evidences the continuing live overlap between the English enforcement process and the jurisdictional issues presently before the Antigua Court.

Digitally signed for and on behalf of the Claimant,

Alkiviades David

Claimant in Person – Disabled Litigant in Person

Digital Signature: Alkiviades David