

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

Claim No. ANUHCV2025/0149

FURTHER SUBMISSION ON MISREPRESENTATION AND PRIOR NOTICE

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.

PARALLEL ENFORCEMENT PROCEEDINGS – ENGLAND

On 19 January 2026, Senior Master Cook of the High Court of Justice (King's Bench Division) adjourned the hearing of the Third Party Debt Order proceedings in Claim KB-2025-001991 to the first available date after 19 February 2026, with costs reserved. Howard Kennedy LLP are the solicitors on record pursuing enforcement arising from the same U.S. judgment relied upon by Defendants.

FURTHER EVIDENTIAL NOTICE – SEALED ENGLISH ORDER

The sealed Order of the High Court of Justice (England & Wales) dated 19 January 2026 confirms that Howard Kennedy LLP were formally served as solicitors in the English enforcement proceedings connected to the same U.S. judgment. This directly contradicts Howard Kennedy LLP's representations to this Court asserting lack of involvement and lack of notice. The English Court's own service of sealed enforcement orders upon Howard Kennedy LLP establishes their active and material participation in the enforcement chain and confirms prior procedural knowledge.

Digitally signed for and on behalf of the Claimant,

Alkiviades David

Claimant in Person – Disabled Litigant in Person

Digital Signature: Alkiviades David