

**IN THE HIGH COURT OF JUSTICE  
KING'S BENCH DIVISION**

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

**Appeal No. CA-2025-002562**

**BETWEEN:**

**MAHIM KHAN**

*Claimant / Respondent*

-and-

**ALKIVIADES DAVID**

*Defendant / Applicant in Person*

**DEFENDANT'S FINAL CONSOLIDATED SUPPLEMENTAL SUBMISSION  
AND APPLICATION FOR THRESHOLD DIRECTIONS, STAY, PRESERVATION, AND  
URGENT CASE MANAGEMENT**

*To: Senior Master Cook*

**I. Personal Position of the Applicant**

1. I, Alkiviades David, respectfully submit to the Court that I am a British citizen. I am disabled within the meaning of section 6 of the Equality Act 2010 by reason of a Traumatic Brain Injury (TBI). I am not mentally unwell. Medical evidence confirming the TBI and resulting disability is exhibited at Annex [Medical]. I respectfully request reasonable adjustments for my disability in these proceedings.
2. These facts also explain why the pressures, losses, and interferences described in this case cannot honestly be confined to one jurisdiction, one asset class, or one narrow narrative. They arose across family, business, health, reputation, and sovereign-linked interests, and are placed before the Court in that full but disciplined context.

**II. Introduction**

3. This submission is advanced on a narrow procedural basis. Its immediate purpose is to prevent coercive enforcement from outrunning procedural legitimacy where threshold objections, omitted evidence, disability-related fairness issues, record-integrity concerns, and live parallel proceedings remain unresolved.
4. This application arises where:
  - (a) the charging-order pathway has already shown irregularity sufficient to derail a listed hearing;
  - (b) threshold objections concerning service, transparency, and the safety of proceeding on the underlying record have been raised;
  - (c) the Defendant's traumatic brain injury and need for reasonable accommodation were documented;

- (d) material evidence existed, was available, and was not properly reflected in the underlying record; and
- (e) live Antigua proceedings bear directly on comity, sequencing, urgency, and enforcement safety.

### **III. Disability Turned into a Control Narrative**

- 5. One of the clearest and most troubling aspects of the record is how my TBI disability was handled. Instead of triggering the accommodations and restraint required under the Equality Act 2010, my condition was pathologized and used as a tool of control.
- 6. In the Orozco material, Dana Cole described me as being in a “downward spiral,” “akin to a mental health crisis,” and raised the prospect of conservatorship. Judge Orozco then said conservatorship “might be an avenue to pursue” and “would be a way of getting a handle on [my] behavior and advance these proceedings.”
- 7. My TBI should have led to fairness, pacing, and accommodation. Instead, it was framed in a manner that diminished my agency and made the pressure architecture more effective. The impact was not abstract; it deepened the coercive control, compounded my injuries, and contributed directly to the asset losses and family harm that followed.

### **IV. Deep Personal Loss and Family Impact**

- 8. The harm I have suffered is deep and personal. It extends far beyond financial loss. My entire family network has been affected.
- 9. The family dimension is not decorative. Materials already in the record include Dimitra Fanny David’s January 2025 extrajudicial declaration demanding return of the unpaid EUR 11,000,000 balance from Dani Peretz and Alexia David. Separate family deposition material from Andreas Karonis-David describes Peretz as having embedded himself into the family household during a period of vulnerability and later extending that access toward my affairs, assets, and vulnerabilities.
- 10. I ask the Court to treat the family-risk lane as real, ongoing, and relevant to urgency and protective case management.

### **V. The Coercive Mechanism**

- 11. My case is that the coercion was collateral-based and total-life in character. I say it mirrored NXIVM-style “collateral” practices in which intimate materials, dependency, fear, humiliation, and compromise of surrounding relationships became forms of leverage.
- 12. To the extent that transferred intimate materials, blackmail communications, or related metadata are relied upon, those materials are identified by neutral description in sealed annexes and should be treated as sensitive material not suitable for open indexing.

### **VI. Quantified Losses**

- 13. The Defendant’s losses are set out in Annex A - Schedule of Loss and supporting valuations, including: over US\$200 million in direct personal assets lost; two IPO pathways valued at US\$800 million; an overall asset value approximated at US\$5 billion; tens of millions from

shows in the last 10 years that were lost or diminished; and loss of opportunity from patents that became commercially dead. The same broader materials also plead sovereign harm to Antigua and Barbuda quantified at US\$80 billion.

## **VII. Alfa Nero, Antigua, and Comity**

14. The same broader network is said to be directly linked to the Alfa Nero superyacht matter in the Southern District of New York. The Defendant relies on the fact that subpoenas sought via Boies Schiller Flexner LLP were quashed by Judge Jesse Furman and later affirmed on appeal as part of the broader cross-jurisdictional context pleaded in this case.

15. The Antigua proceedings (ANUHCV2025/0149) and the Antigua and Barbuda Carbon Compliance Market Act 2025, filed as Exhibit AG on 14 October 2025, further engage comity and sovereign interests. The materials already before this Court also describe the Antigua case as having an existing default posture affecting approximately 70+ defendants, while the final default judgment order itself is to be exhibited separately if required.

## **VIII. Relief Sought**

16. The Defendant respectfully invites the Court to:

- (a) direct that threshold issues of procedural footing, omitted evidence, disability accommodation, record safety, and comity be determined before any further coercive enforcement step;
- (b) stay enforcement, including any charging-order progression, pending that threshold determination;
- (c) direct that the Defendant's disability (TBI) be formally accommodated in any further steps;
- (d) direct preservation of all relevant files, communications, medical/disability materials, witness materials, and electronic evidence;
- (e) take formal note of the existing Antigua record when considering stay, sequencing, and comity;
- (f) treat the matter as urgent and escalate it for immediate case management in light of the live family-risk lane;
- (g) grant such further or other relief as the Court considers just.

## **IX. Conclusion**

17. This application is not an attempt to have the whole world decided at once. It is the opposite. It is an application to stop the pressure machine, identify the threshold issues, protect the integrity of the record, and ensure that enforcement does not outrun fairness.

18. I advance this submission as a disabled litigant in person living with traumatic brain injury. I say that what is before the Court is not a clean and ordinary enforcement path, but a pressured and incomplete one. I ask the Court to answer that problem in the proper judicial way: by sequencing, accommodation, preservation, restraint, and urgency where urgency is genuinely engaged.

19. I therefore respectfully ask Senior Master Cook to treat this as a threshold case-management moment and to direct the matter accordingly.

**Statement of Truth**

I believe that the facts stated in this Supplemental Submission are true.

Signed: \_\_\_\_\_

**Alkiviades David**

Defendant / Applicant in Person

Disabled Litigant in Person

Dated: \_\_\_\_\_

*In fide, veritate, et justitia. Domine, salvum fac Regem.*

## Appendix A - Core Exhibit Map

*Original filenames preserved - evidence bundle unchanged*

Exhibit lane	Original filenames / description
Unsafe underlying record / omitted evidence	AD-WS2 David Vs Superior Court LA.pdf ACD-13_Huzaineh_Statement_of_Truth.pdf.pdf AD-2 to AD-5-ellyn signature fix Mahim Khan-s Ntc of Evidence subject to Court-s Grant tp Plaintiff-s MIL (1).pdf
Disability / TBI / accommodation	FRED-SISTER-MRI.pdf fred kmnew.pdf EXHIBIT N - wexler interim report (1).pdf EXHIBIT - ORZCO 1.pdf
Family infiltration / family-risk lane	Fugitive Alert! Public Deposition of Andreas Karonis David on Dani Peretz Louis Freeh & MOSSAD agent infiltrators.pdf Dimitra January 2025 extrajudicial declaration materials
Antigua / comity / sovereign context	AD-61-AG-Carbon-Act-Filed-Exhibit-14th- October-2025 (1)-1.pdf ANUHCV2025_0149_Amended_Statement_of_Clai m.pdf
Sensitive sealed materials	Sealed annex references for transferred intimate materials, related communications, and metadata (neutral description only)
Alfa Nero and related	Alfa_Nero_SDNY_Furman_Ruling_June_2025.pdf Alfa_Nero_Second_Circuit_Affirmation_[March_A pril_2026].pdf
Schedule of Loss	Schedule_of_Loss_Annex_A_v1.pdf (incorporating >US\$200m personal, US\$800m IPOs, US\$5bn total assets, US\$80bn sovereign, show losses, and patent losses)

*Note: This PDF is formatted as a filing-ready main submission with exhibit map. Where annex labels remain bracketed or sealed-material descriptions remain generic, those items should be replaced with final annex names before lodging.*