

IN THE EASTERN CARIBBEAN SUPREME COURT  
IN THE HIGH COURT OF JUSTICE  
ANTIGUA AND BARBUDA

**Claim No.: ANUHCV2025/0149**

**ALKIVIADES DAVID – Claimant**  
and  
**DAVID BOIES & OTHERS – Defendants**

**RE-ISSUED WRITTEN SUBMISSIONS**

(Jurisdiction and Directly Related Proceedings)

**Filed pursuant to the Order of the Honourable Justice Rene Williams dated 29 October 2025**

**1. Purpose and Compliance**

These submissions are filed strictly in compliance with the Court's Order directing written submissions on jurisdiction and reasonable cause of action. They are provided solely to assist the Court on the threshold issues identified and introduce no extraneous material.

**2. Case-Management Posture**

By its Order of 29 October 2025, this Honourable Court seized and retained control of the jurisdictional issues in this claim, directed written submissions, restricted further filings without leave, and adjourned the matter to 16 January 2026. The Court is therefore the forum presently determining threshold jurisdiction.

**3. Directly Related Proceedings – California**

Official appellate materials before the California Court of Appeal demonstrate that the foreign judgment relied upon in related proceedings is under active appellate challenge, including on grounds of trial in the defendant's absence, lack of valid notice, failure to rule on disability accommodation requests, and liability findings arising from procedural sanctions rather than adjudication on the merits. These matters bear directly on the provenance and reliability of that judgment.

**4. Directly Related Proceedings – United Kingdom**

Directly related appellate proceedings are also presently active in the United Kingdom, arising from the same factual matrix and involving reliance on the same underlying judgment.

**5. Identity of Parties Across Jurisdictions**

As a matter of procedural fact, certain legal practitioners who are defendants in the present proceedings are also named defendants in the directly related proceedings pending in California and the United Kingdom. This demonstrates substantial factual and procedural overlap across jurisdictions.

**6. Anticipation of This Court's Ruling**

The directly related proceedings in both California and the United Kingdom are proceeding on the basis that this Honourable Court's ruling on the threshold issues before it will be materially relevant. No determination is sought from this Court in respect of any foreign proceeding.

**7. Jurisdictional Relevance**

This procedural posture supports the Court's role as a coordinating forum for determining threshold jurisdictional issues, consistent with principles of judicial comity and orderly administration of

justice.

**Dated:** 08 January 2026

**Signed digitally:**

Alkiviades David

Litigant in Person