

**IN THE HIGH COURT OF JUSTICE  
ANTIGUA AND BARBUDA**

BETWEEN:

**ALKIVIADES DAVID**

Applicant

AND

**DAVID BOIES, et al.**

Respondents

Claim No.: ANUHCV2025/0149

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**NOTICE OF MOTION TO STAY AND NULLIFY ALL FOREIGN PROCEEDINGS AND TO  
STRIKE MALICIOUS ATTACHMENT**

TO: THE HONOURABLE JUDGE OF THE HIGH COURT OF JUSTICE OF ANTIGUA AND  
BARBUDA

TAKE NOTICE that the Applicant, ALKIVIADES DAVID, shall move this Honourable Court  
for the following relief:

1. An ORDER declaring that all legal actions filed against the Applicant in foreign jurisdictions—including those instituted in the State of California under Case No. 20STCV37498—are **null, void, and unenforceable** within the sovereign territory of Antigua and Barbuda.
2. An ORDER staying the effect and enforcement of any such foreign judgments, including the judgment dated July 5, 2024, in the Superior Court of Los Angeles County, pending this Court's adjudication of the fraud, racketeering, and abuse of process claims currently under review.
3. An ORDER striking the Applicant's name from any and all foreign litigation or filings relating to the vessel *Alpha Nero*, having found no legal, factual, or equitable justification for such inclusion.
4. An ORDER restraining and enjoining the Respondents, including David Boies, Boies Schiller Flexner LLP, and their affiliates, from undertaking or initiating any further enforcement or litigation actions against the Applicant while these sovereign proceedings remain pending.

AND TAKE NOTICE that this Motion is brought pursuant to this Honourable Court's inherent equitable jurisdiction, the doctrine of international comity, and the fundamental obligation to preserve the sovereignty and judicial independence of Antigua and Barbuda from unlawful extraterritorial coercion.

IN SUPPORT of this Motion, the Applicant shall rely on:

- The sworn Affidavit of Alkiviades David;

- Exhibits A through F already on file with this Honourable Court;
- The publicly documented misconduct of the Respondents in foreign jurisdictions;
- The international and sovereign legal implications detailed herein.

DATED this 28th day of May, 2025.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, loopy initial 'A' followed by a smaller, more complex scribble.

**ALKIVIADES DAVID**  
Applicant, Pro Se