

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

Claim No: KB-2025-001991

Appeal No: CA-2025-002562

**APPELLANT'S CONSOLIDATED SUBMISSION
ON EVIDENTIAL INTEGRITY, PROCEDURAL FAIRNESS,
AND SYSTEMIC RISK**

ELITE POLISHED BUNDLE WITH EMBEDDED VISUAL EXHIBITS

ALKIVIADES DAVID

Appellant in Person

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The visual exhibits are included as contextual material only and are not relied upon as proof of liability.

1. CORE SUBMISSION

A. INTRODUCTION

This submission is advanced on a narrow, urgent, and fundamental basis.

The Court is being asked to determine the appeal on an evidential record that is incomplete, fragmented, and materially challenged as to its reliability.

The Appellant respectfully submits that it would be procedurally unsafe and unjust for the Court to proceed on the present basis.

B. THE CORE ISSUE – URGENT PROCEDURAL RISK

The central question is not merely one of evidential weight, but of evidential absence and fragmentation across jurisdictions.

The Appellant's position is unequivocal: the Court cannot safely determine this appeal on the current record. To do so would create a real and immediate risk of procedural unfairness and miscarriage of justice.

C. PARALLEL AND FRAGMENTED PROCEEDINGS

Highly relevant evidence is dispersed across multiple jurisdictions, including active proceedings in Antigua and Barbuda (ANUHCV2025/0149), related United States materials, and the present appeal.

These materials have not been consolidated. No single court currently possesses the full evidential picture.

This fragmentation is immediate and directly affects the fairness of these proceedings.

D. EVIDENTIAL INSTABILITY IN THE RECORD BELOW

The record below is compromised by material omissions, contradictions affecting witness reliability, serious concerns regarding document integrity, and procedural handling that failed to accommodate the Appellant's documented neurological injury and executive dysfunction.

These matters are not peripheral. They go directly to the reliability of the findings the Court is now being asked to determine upon.

E. MATERIAL INDICATING EVIDENCE INTERFERENCE AND ABSENCE

Exhibited materials demonstrate that relevant evidence may have been seized, removed, suppressed, restricted, or destroyed, including documentation of device seizures, a sworn statement from a practising attorney confirming suppression, and U.S. appellate intervention affecting evidence availability.

These materials are relied upon solely to show that potentially decisive evidence is missing or compromised and is not before the Court.

F. FAMILY WITNESS CONTEXT (LIMITED USE)

The Appellant also exhibits a deposition from a close family member describing third-party involvement within the family environment and concerns regarding control of communication, finances, and information.

This material is relied upon solely as contextual support that issues of access, control, and evidential completeness are not isolated.

G. MEDICAL AND PARTICIPATION CONTEXT

Medical evidence confirms that the Appellant suffers from a documented neurological injury giving rise to executive dysfunction and psychiatric symptomatology, while retaining capacity to understand the proceedings.

That evidence is relevant to the Appellant's effective participation, heightened vulnerability to evidential gaps, and the urgent need for procedural caution by the Court.

H. CONSEQUENCE – IMMEDIATE RISK OF INJUSTICE

The cumulative effect is clear: the Court does not have a complete and reliable evidential record.

The missing or disputed material is potentially central, not peripheral.

Any determination on the present basis carries a real, immediate, and avoidable risk of procedural unfairness. The Court has already granted the Appellant space to address these concerns. That opportunity must now be used to prevent irreversible prejudice.

This is precisely the kind of situation in which the Court's intervention is required. If the Court proceeds on a materially incomplete record, the prejudice may become irreversible. If, however, the Court intervenes now, the integrity of the process can still be protected.

I. PRINCIPLED POSITION

The Appellant's position remains disciplined and confined.

This is not a collateral attack and not an attempt to expand the appeal into a free-standing narrative of wrongdoing.

It is a structural challenge to evidential integrity.

Where evidence is fragmented across jurisdictions, material evidence is absent or contested, and the record below is challenged as unreliable, the Court cannot safely proceed as though the evidential foundation were complete.

The Court is therefore being asked to decide not on a complete record, but on a selection of it.

The Appellant respectfully submits that the Court is not merely entitled to intervene, but is now squarely confronted with the question whether justice can responsibly be administered on the material presently available.

Where the Court is shown that relevant evidence is fragmented, potentially compromised, and not yet capable of being viewed in a coherent whole, the Court's supervisory and case-management function is directly engaged.

J. RELIEF SOUGHT

The Appellant respectfully invites the Court to:

- a. recognise that the present evidential record is incomplete and procedurally unsafe;
- b. decline to determine the appeal on its current basis;
- c. grant a stay of enforcement and/or such further directions as are necessary to prevent irreversible prejudice and to ensure that any final determination is made only on a properly constituted, complete, and reliable record; and
- d. give any additional protective or case-management directions the Court considers necessary to safeguard the fairness and integrity of these proceedings.

J1. WHY INTERVENTION IS REQUIRED NOW

The need for intervention is immediate. The risk identified is not abstract or future-facing. It concerns the Court's present ability to adjudicate safely.

The Court has already afforded the Appellant the opportunity to address these matters. That procedural space serves no purpose unless the Court is willing, where appropriate, to act upon the consequences that now emerge from the material.

In the Appellant's respectful submission, this is the point at which intervention is required: before a partial record hardens into an irreversible result.

What now triggers intervention is not the volume of dispute, but the combination of incompleteness, immediacy, and consequence. The Court is faced with a record challenged as materially incomplete, in circumstances where the absent material may be central, where the resulting prejudice may become irreversible if the Court does not act now, and where procedural fairness to a medically vulnerable litigant is directly engaged. That combination, respectfully, calls for intervention.

K. FINAL POSITION

This is not a question of evidential weight.

It is a question of evidential absence at a moment when the Court still has the power — and, respectfully, the duty — to prevent injustice.

If the Court does not intervene now, it may later be impossible to undo the prejudice of having proceeded on a partial record.

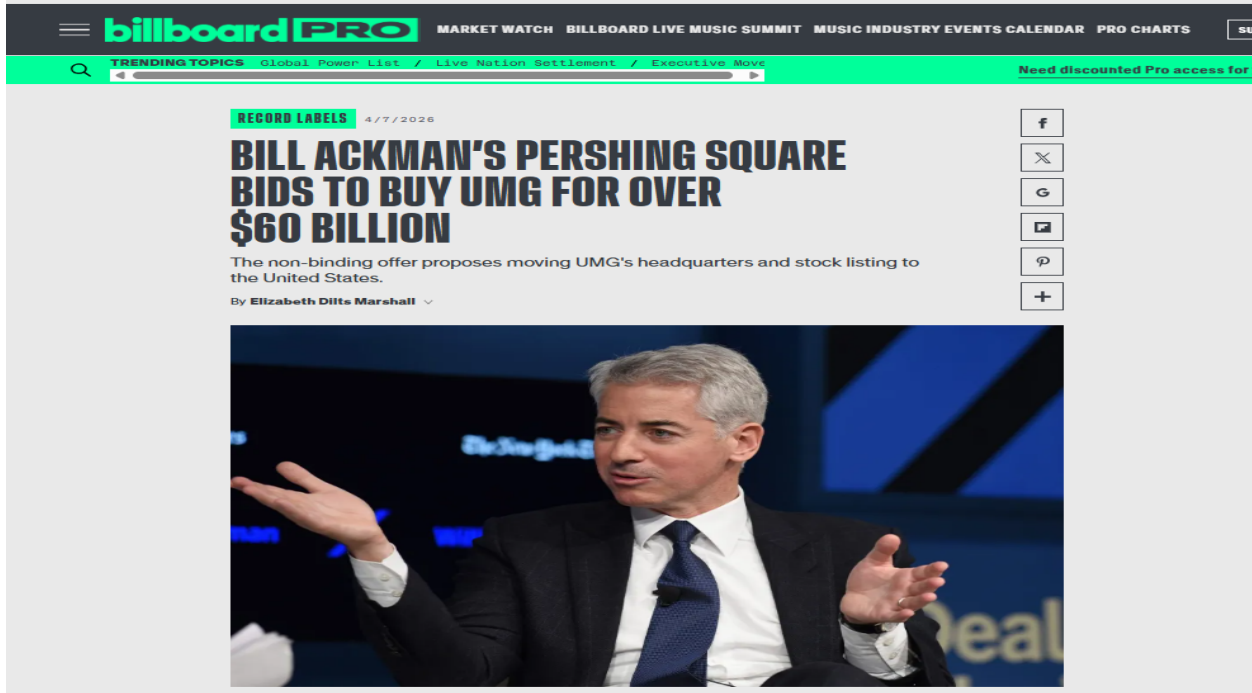
The record relied upon below is challenged as both materially incomplete and unreliable.

The Court is respectfully urged to intervene now to protect the fairness, integrity, and safety of these proceedings.

2. VISUAL EXHIBITS

The following images are arranged to show a coherent contextual progression: scale, market structure, jurisdictional overlap, and institutional risk. They are exhibited as contextual material only.

Exhibit V1



Financial scale and market power context.

Exhibit V2

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LIMEWIRE STRIKES DEAL WITH UNIVERSAL MUSIC GROUP FOR ITS MUSIC NFT LICENSING PLATFORM - UMG



LimeWire and UMG will focus on quality content, utility and accessibility for the mainstream by offering unique NFT projects for artists and fans in a trusted environment.

NEWS



BERLIN, GERMANY, May 17, 2022 – LimeWire, a digital collectibles marketplace, announced today that it has struck its first major music label partnership with

Universal Music Group (UMG), the world leader in music-based entertainment, and will collaborate on making digital music collectibles accessible to a wider audience. UMG artists, as well as many of its iconic record labels including: Interscope Records, Republic Records, Def Jam Recordings, Capitol Records, Motown Records, Geffen, EMI, Virgin Music and more, will be able to leverage the LimeWire marketplace as an additional platform to explore unique ways to engage with fans through digital music collectibles and Web3, and generate new revenue streams. As part of this partnership, UMG will provide licences that will allow LimeWire to partner with UMG artists in order to launch innovative music-based NFT projects utilising the LimeWire marketplace.

Platform evolution into controlled licensed ecosystems.

Exhibit V3



Prime Minister Gaston Browne

By **Jovani Davis**

The United States Court of Appeals has ruled in favor of Antigua and Barbuda Prime Minister Gaston Browne and other Antiguan and Barbudan individuals and entities in a financial disclosure case brought by Russian citizen Yulia Guryeva Motlokhov.

Cross-border legal and sovereign context.

Exhibit V4

NEWS STORY

Leader of FBI's Los Angeles Field Office Has Ties to Subject of Embezzlement Investigation

3 Years Ago 0 2 Mins



By Steve Neavling

As the FBI's Los Angeles Field Office investigates disgraced legal legend Tom Girardi, questions are being raised about his connections to one of the office's leaders.

[Donald Alway](#), the assistant director in charge of the field office, has family ties to Girardi, who is accused of misappropriating his clients' settlement money to enrich himself, [The Los Angeles Times reports](#).

Assistant Director in Charge Donald Alway

Alway's mother, Michelle Alway, was Girardi's former girlfriend and secretary. During the 1990s, she received hundreds of thousands of dollars from Girardi and his law firm, court records states.

Girardi also contributed more than \$131,000 towards the mortgage of her home in Carmel-by-the-Sea,

Institutional overlap and accountability context.