

**IN THE COURT OF APPEAL (CIVIL DIVISION)
ON APPEAL FROM THE HIGH COURT OF JUSTICE
(KING'S BENCH DIVISION)**

Case No: CA-2025-002562

BETWEEN:

ALKIVIADES DAVID
Appellant

and

MAHIM KHAN & OTHERS
Respondents

**APPELLANT'S CONSOLIDATED SUPPLEMENTAL
SUBMISSIONS**

(Fresh Evidence – Ladd v Marshall / Procedural Fairness / Structural Context / Asset Exposure / Multi-Jurisdictional Developments)

I. INTRODUCTION

This filing is submitted pursuant to the directions of Senior Master Cook and is intended to assist the Court in understanding the current procedural and evidentiary posture of this matter.

It consolidates fresh evidence, procedural irregularities, failures in representation, multi-jurisdictional developments, and the structural environment within which the record was formed.

The Appellant is severely disabled (traumatic brain injury), which has materially impacted his ability to rely on conventional legal representation and has made the failures described herein significantly prejudicial.

II. CORE SUBMISSION

The record upon which enforcement is sought is materially incomplete, having been formed in circumstances where relevant evidence existed but was not advanced.

III. FRESH EVIDENCE (LADD v MARSHALL)

- 1 Carl Dawson recorded testimony confirming affidavit existed and was ignored
- 2 400+ emails not advanced
- 3 Documentary irregularities in Antigua proceedings under CID review
- 4 Witness chain evidence across jurisdictions

IV. FAILURE OF REPRESENTATION

Representation failures include omission of key evidence and witness material. Barry Rothman (deceased) held critical evidence later retrieved with difficulty.

V. PROCEDURAL IRREGULARITIES

Irregularities identified in Antigua proceedings, United States parallel matters, and current UK enforcement reliance on incomplete record.

VI. MULTI-JURISDICTIONAL CONTEXT

This matter spans the United Kingdom, United States, Antigua & Barbuda, Switzerland, and Greece.

Courts should not enforce judgments formed on incomplete or compromised records where parallel proceedings raise serious concerns.

VII. STRUCTURAL CONTEXT

The Appellant identifies overlapping legal, enforcement, financial, and media actors forming the broader environment.

VIII. OPERATIONAL PATTERN

- 1 Targeting of individuals with valuable assets
- 2 Control or compromise of representation
- 3 Non-presentation of evidence
- 4 Media pressure
- 5 Asset exposure
- 6 Enforcement of outcomes

IX. INTELLECTUAL PROPERTY

Includes Hologram USA patent and SWISSX e-cig patent with allegations of unauthorized exploitation and dilution.

X. REAL PROPERTY

Includes Greek property interests and related financial pressures.

XI. VICTIMS AND WITNESS ENVIRONMENT

Daniel Kapon Jnr and his mother are presented as victims within the evidentiary environment.

XII. MEDIA ENVIRONMENT

Narrative shaping and reputational pressure are alleged to have influenced proceedings.

XIII. STRUCTURAL SUMMARY

The Appellant's case is that enforcement arises from a structurally incomplete record formed within overlapping legal, commercial, and media influence.

XIV. RELIEF SOUGHT

- 1 Stay of enforcement (CPR 83.7)
- 2 Permission to rely on fresh evidence
- 3 Directions for evidentiary review
- 4 Recognition of procedural unfairness