

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

BETWEEN:

ALKIVIADES DAVID (Appellant)

-and-

(1) MAHIM KHAN

(2) HOWARD KENNEDY LLP

(3) [Others as pleaded]

APPELLANT'S SKELETON ARGUMENT

(Appeal against the contempt order of Mrs Justice Stacey dated 16 October 2025)

Date: 22 March 2026

EXHIBIT REFERENCES

ACD-01 Shoefield Statement

ACD-02 Calendar Affidavit

ACD-03 Rizzo Communications

ACD-04 Garofalo Declaration and Exhibits

ACD-05 Contempt Order

ACD-06 Wexler Report

ACD-07 Karampoutakis Report

ACD-08 Response to Howard Kennedy

ACD-10 Lieberman Letter

ACD-11 California Court of Appeal Judgment

ACD-12 Howard Kennedy Letter

ACD-13 Huzaineh Statement

ACD-14 Metropolitan Police Email

ACD-22 Revolut Account Restriction

ACD-23 Sigma Bank Closure

ACD-24 Professional Services Withdrawal

1. INTRODUCTION

This is the Appellant's appeal against the contempt order dated 16 October 2025.

2. ISSUES

Whether the finding is unsafe due to incomplete evidence, procedural unfairness, and evidential irregularity.

3. LEGAL FRAMEWORK

CPR 52.21 applies. Ladd v Marshall governs fresh evidence. Article 6 ECHR engaged.

4. GROUND 1

Material non-disclosure and fresh evidence undermine the evidential foundation.

5. GROUND 2

Impaired participation due to medical condition and cumulative financial and operational pressure created inequality of arms.

6. GROUND 3

Procedural irregularity undermines the integrity of the record.

7. CUMULATIVE EFFECT

The combined defects render the finding unsafe.

8. RELIEF

Set aside or vary the contempt order.

9. CONCLUSION

The contempt finding cannot safely stand.

Signed:

Alkiviades David (digitally signed)