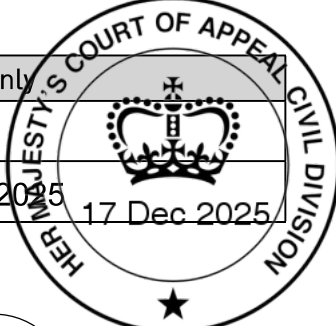


Appellant's notice

(All appeals except small claims track appeals and appeals to the Family Division of the High Court)

Notes for guidance are available which will help you complete this form. Please read them carefully before you complete each section.

For Court use only	
Appeal Court Ref. No.	
Date filed	20th Oct 2025 17 Dec 2025



CA-2025-002562
SEAL Submitted Date:
16-12-2025

Section 1 Details of the claim or case you are appealing against

Claim or Case no. Fee Account no.
(if applicable)

Help with Fees - Ref no. (if applicable) --

Name(s) of the Claimant(s) Applicant(s) Petitioner(s)

Name(s) of the Defendant(s) Respondent(s)

Details of the party appealing ('The Appellant')

Name

Address (including postcode)

 I live abroad in Antigua & Barbuda

Tel No.	<input type="text" value="07879440604"/>
Fax	<input type="text"/>
E-mail	<input type="text" value="legal@SWISSX.com"/>

Details of the Respondent to the appeal

Name

Address (including postcode)

Tel No.	<input type="text"/>
Fax	<input type="text"/>
E-mail	<input type="text"/>

Details of additional parties (if any) are attached Yes No

Section 2 Details of the appeal

From which court is the appeal being brought?

- The County Court at
- The Family Court at
- High Court
- Queen's Bench Division
 - Chancery Division
 - Family Division
- Other (please specify)

What is the name of the Judge whose decision you want to appeal?

What is the status of the Judge whose decision you want to appeal?

- District Judge or Deputy Circuit Judge or Recorder Tribunal Judge
- Master or Deputy High Court Judge or Deputy Justice(s) of the Peace

What is the date of the decision you wish to appeal against?

Is the decision you wish to appeal a previous appeal decision?

- Yes No

Section 3 Legal representation

Are you legally represented?

Yes No

If Yes, is your legal representative (please tick as appropriate)

- a solicitor
- direct access counsel instructed to conduct litigation on your behalf
- direct access counsel instructed to represent you at hearings only

Name of your legal representative

The address (including postcode) of your legal representative

Tel No.	
Fax	
E-mail	
DX	
Ref.	

Are you, the Appellant, in receipt of a Civil Legal Aid Certificate?

Yes No

Is the respondent legally represented?

Yes No

If 'Yes', please give details of the respondent's legal representative below

Name and address (including postcode) of the respondent's legal representative

Boniswa Dzere
Howard Kennedy LLP
No.1 London Bridge London SE1 9BG

Tel No.	+44 (0)20 3755 5639
Fax	
E-mail	Boniswa.dzere@howardkennedy.com
DX	
Ref.	

Section 4 Permission to appeal

Do you need permission to appeal?

Yes No

Has permission to appeal been granted?

Yes (Complete Box A)

No (Complete Box B)

Box A

Date of order granting permission

Name of Judge granting permission

Box B

I

the Appellant('s legal representative) seek permission to appeal.

If permission to appeal has been granted **in part** by the lower court, do you seek permission to appeal in respect of the grounds refused by the lower court?

Yes No

Section 5 Other information required for the appeal

Please set out the order (or part of the order) you wish to appeal against

I, Alkiviades David, respectfully seek permission to appeal.

Justice Stacey indicated on the record that I may appeal her order dated oct 15th], and this notice is therefore filed in reliance on that statement. Permission is formally sought from the Court of Appeal in accordance with CPR 52.3(2)

Have you lodged this notice with the court in time?

(There are different types of appeal - see Guidance Notes N161A)

Yes No

If '**No**' you must also complete **Part B of Section 10 and Section 11**

Section 6 Grounds of appeal

Please state, in numbered paragraphs, **on a separate sheet** attached to this notice and entitled 'Grounds of Appeal' (also in the top right hand corner add your claim or case number and full name), why you are saying that the Judge who made the order you are appealing was wrong.

I confirm that the grounds of appeal are attached to this notice.

Section 7 Arguments in support of grounds for appeal

- I confirm that the arguments (known as a ‘Skeleton Argument’) in support of the ‘Grounds of Appeal’ are set out **on a separate sheet** and attached to this notice.

OR (in the case of appeals other than to the Court of Appeal)

- I confirm that the arguments (known as a ‘Skeleton Argument’) in support of the ‘Grounds of Appeal’ will follow within 14 days of filing this Appellant’s Notice. A skeleton argument should only be filed if appropriate, in accordance with CPR Practice Direction 52B, paragraph 8.3.

Section 8 Aarhus Convention Claim

For applications made under the Town and Country Planning Act 1990 or Planning (Listed Buildings and Conservation Areas) Act 1990

I contend that this claim is an Aarhus Convention Claim Yes No

If Yes, and you are appealing to the Court of Appeal, any application for an order to limit the recoverable costs of an appeal, pursuant to CPR 52.19, should be made in section 10.

If Yes, indicate in the following box if you do not wish the costs limits under CPR 45 to apply. If you have indicated that the claim is an Aarhus claim set out the grounds below

Section 9 What are you asking the Appeal Court to do?

I am asking the appeal court to:-
(please tick the appropriate box)

- set aside the order which I am appealing
- vary the order which I am appealing and substitute the following order. Set out in the following space the order you are asking for:-

The Appellant respectfully seeks an order that the judgment and associated costs order made by the Hon. Mrs Justice Stacey on 15 October 2025 be set aside in its entirety, on the grounds of procedural unfairness, misdirection in law, and failure to consider material evidence previously filed in the High Court record.

Alternatively, the Appellant requests that the matter be remitted to a different High Court judge for reconsideration of the evidence and costs assessment.

- order a new trial

Section 10 Other applications

Complete this section **only** if you are making any additional applications.

Part A

- I apply for a stay of execution. (You must set out in Section 11 your reasons for seeking a stay of execution and evidence in support of your application.)

Part B

- I apply for an extension of time for filing my appeal notice. (You must set out in Section 11 the reasons for the delay and what steps you have taken since the decision you are appealing.)

Part C

- I apply for an order that:

I apply for an order that the Court direct the Respondent to produce the original correspondence and witness statements referenced in the High Court proceedings, as they are material to the grounds of appeal.

I apply for an order that the Court direct the Respondent and their solicitors, Howard Kennedy LLP, to produce the original correspondence, including the approximately 400 emails exchanged with the Appellant (including those sent to June Morgan), which were referenced in the High Court proceedings and billed for in their costs schedule.

(You must set out in Section 11 your reasons and your evidence in support of your application.)

In support of my application(s) in Section 10, I wish to rely upon the following reasons and evidence:

The Appellant relies upon the fact that the Respondent's solicitors, Howard Kennedy LLP, represented to the High Court that they had reviewed and responded to over 400 emails from the Appellant. These communications, many of which were sent to June Morgan, were relied upon to justify a substantial portion of the £80 000 costs order made by the Hon. Mrs Justice Stacey on 15 October 2025. However, these emails were never exhibited or disclosed, leaving the evidentiary record incomplete.

Before the hearing, the Respondent's solicitors originally sought £160 000 in costs, asserting an inflated estimate based on review of the same correspondence. When challenged, they reduced that figure by half. The Hon. Mrs Justice Stacey herself expressed concern at the hearing as to how such a sum had been reached, and it was subsequently amended to £80 000. The Appellant contends that this sequence demonstrates disproportionate and unsubstantiated billing contrary to CPR 44.3(2)(a).

The Appellant respectfully submits that disclosure of the correspondence, billing entries, and any draft or served applications for restraint of speech is material to the grounds of appeal, including the proportionality of the costs order, the fairness of the process, and the integrity of the High Court record under CPR 1.1, 1.3 and 44.3.

In parallel, the Appellant is a party acting in person (pro se) in related proceedings before the Eastern Caribbean Supreme Court in Antigua & Barbuda and in appellate proceedings in the United States. Those filings concern substantially similar factual and evidential issues, including overlapping witness statements and cost representations by associated legal and corporate entities. The outcomes of those matters are material to consistency and fairness in this appeal.

The Appellant therefore requests, pursuant to CPR 52.11(2), that the Court direct the Respondent and its solicitors, Howard Kennedy LLP, to produce the original correspondence (including the 400 emails exchanged with June Morgan), all billing records and cost schedules supporting the £160 000 and £80 000 claims, and any draft or filed applications seeking to restrain the Appellant's speech, within 14 days of the order, for inclusion in the appeal bundle.

The Appellant further requests that enforcement of the £80 000 costs order be stayed pending production and review of this material, to prevent prejudice and ensure that the appeal can be determined on a complete and accurate record.

2A Physical Assault and Witnessed Intimidation in the High Court

During proceedings before Mrs Justice Stacey, the Appellant was physically assaulted by Mr A.J. Fournellier, an associate of the Respondent firm Howard Kennedy LLP, inside the High Court building. The assault occurred in the presence of Court Protection & Compliance (CPC) officers 10 and 26, who witnessed the incident and may be called as material witnesses.

The Appellant immediately reported the matter to court security. No investigation, record, or safeguarding measure was initiated, and the incident was omitted from the transcript. The assault compounded the Appellant's disability-related vulnerability and created a hostile and intimidating environment, breaching the Court's duty to ensure dignity, safety, and equality of arms for all participants.

This failure constitutes a procedural irregularity and a denial of justice under Article 6 ECHR and Equality Act 2010 ss 20 and 29, requiring review by the Court of Appeal and referral to the appropriate disciplinary and law-enforcement bodies. The Appellant further relies on evidence that Mr A.J. Fournellier, associate at Howard Kennedy LLP, assaulted him in the High Court, witnessed by CPC officers 10 and 26. The incident demonstrates intimidation and procedural misconduct by the Respondent's representatives and supports the request for rehearing before a different judge.

Revised Ground 3A — Attempt to Suppress and Remove Self-Representation

During proceedings before Mrs Justice Stacey, counsel for the Respondents, Ms Rebecca Hume of Howard Kennedy LLP, applied for an order that the Appellant be prohibited from continuing to represent himself, asserting that his numerous filings rendered him unfit to appear in person.

Mrs Justice Stacey firmly rejected this request, confirming on the record that self-representation is a constitutional right and that the number of filings does not amount to vexatious behaviour. This attempted suppression of the Appellant's

Vulnerability

Do you believe you, or a witness who will give evidence on your behalf, are vulnerable in any way which the court needs to consider?

- Yes. Please explain in what way you or the witness are vulnerable and what steps, support or adjustments you wish the court and the judge to consider.

The Appellant is a registered disabled person with a traumatic brain injury that causes cognitive-processing, concentration, and mobility impairments. These conditions make prolonged electronic work and courtroom stress physically exhausting. In earlier proceedings before Mr Justice Cotter, the Appellant's disability was formally recognised: the judge read the Appellant's skeleton argument on the record and appointed himself Special Master to oversee the case so that reasonable adjustments could be maintained. Those safeguards were later withdrawn without notice, leaving the Appellant unable to use CE-File unaided and resulting in significant procedural disadvantage.

- No

Statement of Truth

This must be completed in support of the evidence in Section 11

I understand that proceedings for contempt of court may be brought against a person who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

- I believe** that the facts stated in section 11 are true.
- The applicant believes** that the facts stated in section 11 are true. **I am authorised** by the applicant to sign this statement.

Signature

Signed electronically: /s/ Alkiviades A. David
Name: Alkiviades A. David
Date: 18 October 2025

- Applicant
- Litigation friend (where applicant is a child or a Protected Party)
- Applicant's legal representative (as defined by CPR 2.3(1))

Date

Day Month Year

Full name

ALKIVIADES ANDREW DAVID

Name of applicant's legal representative's firm

Pro Sei

If signing on behalf of firm or company give position or office held

Section 13 Supporting documents

To support your appeal you should file with this notice all relevant documents listed below. To show which documents you are filing, please tick the appropriate boxes.

If you do not have a document that you intend to use to support your appeal complete the box over the page.

In the County Court or High Court:

- three copies of the appellant's notice for the appeal court and three copies of the grounds of appeal;
- one additional copy of the appellant's notice and grounds of appeal for each of the respondents;
- one copy of the sealed (stamped by the court) order being appealed;
- a copy of any order giving or refusing permission to appeal; together with a copy of the judge's reasons for allowing or refusing permission to appeal; and
- a copy of the Civil Legal Aid Agency Certificate (if legally represented).

In the Court of Appeal:

- three copies of the appellant's notice and three copies of the grounds of appeal on a separate sheet attached to each appellant's notice;
- one additional copy of the appellant's notice and one copy of the grounds of appeal for each of the respondents;
- one copy of the sealed (stamped by the court) order or tribunal determination being appealed;
- a copy of any order giving or refusing permission to appeal together with a copy of the judge's reasons for allowing or refusing permission to appeal;
- one copy of any witness statement or affidavit in support of any application included in the appellant's notice;
- where the decision of the lower court was itself made on appeal, a copy of the first order, the reasons given by the judge who made it and the appellant's notice of appeal against that order;
- in a claim for judicial review or a statutory appeal a copy of the original decision which was the subject of the application to the lower court;
- one copy of the skeleton arguments in support of the appeal or application for permission to appeal;
- a copy of the approved transcript of judgment; and
- a copy of the Civil Legal Aid Certificate (if applicable)
- where a claim relates to an Aarhus Convention claim, a schedule of the claimant's financial resources

Reasons why you have not supplied a document and date when you expect it to be available:-

Title of document and reason not supplied	Date when it will be supplied
<p>The Appellant has requested from the King's Bench Division a sealed copy of the final order of The Hon. Mrs Justice Stacey (15 October 2025). At the time of filing this Appellant's Notice, the sealed order has not yet been issued by the Court.</p>	
<p>The Appellant will file the sealed order and approved transcript of judgment immediately upon receipt from the High Court (CE-File request submitted).</p>	
<p>In the meantime, a copy of the unsealed draft minute of order and the hearing transcript extract confirming the date and nature of the judgment are enclosed for reference.</p>	
<p>This notice is lodged within the permitted time in order to preserve the Appellant's right of appeal pending issue of the sealed order.</p>	

Section 14 The notice of appeal must be signed here

Signed Signed electronically: /s/ Alkiviades A. [

Appellant('s legal representative)

Find out how HM Courts and Tribunals Service uses personal information you give when you fill in a form.

<https://www.gov.uk/government/organisations/hm-courts-and-tribunals-service/about/personal-information-charter>