

IN THE JUDICIAL COMMITTEE OF THE PRIVY COUNCIL
ON APPEAL FROM THE EASTERN CARIBBEAN SUPREME COURT
ANTIGUA AND BARBUDA

URGENT APPLICATION TO STAY ENFORCEMENT

and for preservation directions

Re: London KB-2025-001991 / CA-2025-002562

Antigua ANUHCV2025/0149

ALKIVIADES DAVID

Appellant / Applicant (Litigant in Person)

Address: SwissX Island, St John's, Antigua & Barbuda

Application

The Appellant / Applicant, Alkiviades David, applies for urgent interim relief pending determination of the appeal and related procedural matters.

Order Sought

1. An immediate stay of enforcement pending further order.
2. Preservation directions in respect of non-privileged factual records, metadata, communications, device-derived materials, and related evidential pathways relevant to the appeal and to the matters identified in the accompanying witness statement.
3. Such further case-management or protective directions as the Judicial Committee considers just.

Grounds

4. The Applicant has made repeated stay requests below and says that no substantive determination has removed the practical prejudice caused by continuing enforcement.
5. The Applicant says the appellate record has been materially incomplete and that material going to contradiction, inconsistency, and fairness was not deployed.
6. The Applicant is a disabled litigant with a traumatic brain injury and relies on the accompanying medical materials in support of the need for reasonable adjustment and procedural protection.
7. Enforcement has moved into a second phase. The Applicant relies on third-party evidence said to show interference with devices and records, including the seizure of an iPad and DVR on 1 June 2023, even though the declarant was not the judgment debtor.

8. The Applicant relies on documentary materials concerning the provenance, control, beneficiaries, and financial-transfer pathway of the Harmonia Trust, including the trust instrument, protector correspondence, Venable communications, Morgan Stanley transfer instructions, and Credit Suisse email chains.

9. The Applicant says the proceedings intersect with live safeguarding concerns affecting his minor children and with disputed beneficial interests.

10. The Applicant also relies on a preservation-focused memorandum dated 9 April 2026 said to identify a dated communications trail involving Antigua-linked persons and to justify immediate preservation directions.

Urgency

11. The application is urgent because enforcement is said to be continuing while threshold issues remain unresolved.

12. On the Applicant's case, continued enforcement risks prejudice to record integrity, device integrity, evidential continuity, trust-related assets, and safeguarding interests affecting minor children.

Why Relief Should Be Granted

13. This application does not ask the Judicial Committee to determine every wider dispute at this stage.

14. The present question is whether it is safe and fair for enforcement to continue while the record is challenged as incomplete, TBI-related fairness concerns remain unresolved, Harmonia provenance remains disputed, Swiss attachment measures remain active, and safeguarding concerns remain live.

15. The Applicant respectfully says it is not safe for enforcement to continue in those circumstances.

Documents Relied Upon

16. Updated Affidavit / Witness Statement of Alkiviades David dated 18 April 2026.

17. Harmonia Trust instrument and related protector / trustee correspondence.

18. Venable email dated 20 June 2018.

19. Morgan Stanley transfer instructions dated 6 September 2018.

20. Credit Suisse / Kenneth Morris / Thomas Rohner chain.

21. Bridgeford email of 7 November 2019 and Harmonia update email of 13 March 2023.

22. Medical materials concerning traumatic brain injury and judicial-use note.

23. Preservation memorandum dated 9 April 2026.

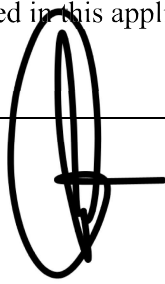
Statement of Truth

I believe that the facts stated in this application are true.

Signed: _____

ALKIVIADES DAVID

Dated: 18 April 2026

A handwritten signature in black ink, consisting of a large, stylized letter 'D' with a vertical line through it and a horizontal line extending to the right from the middle of the vertical line.