

# **IN THE HIGH COURT OF JUSTICE EASTERN CARIBBEAN SUPREME COURT – ANTIGUA & BARBUDA**

**Claim No. ANUHCV2025/0149**

## ***CLAIMANT'S RESPONSE TO LETTER OF HOWARD KENNEDY LLP DATED 7 JANUARY 2026***

The Claimant, Alkiviades David, a disabled litigant appearing in person, respectfully files this response to address material inaccuracies and misrepresentations contained in the letter submitted by Howard Kennedy LLP to this Honourable Court dated 7 January 2026.

### **1. Misrepresentation Regarding the U.S. Supreme Court**

Howard Kennedy LLP represented that the Claimant unsuccessfully appealed the U.S. Judgment to the Supreme Court of the United States. This is false. No appeal was ever filed before the Supreme Court of the United States. The proceedings remained entirely within the California civil appellate courts and no petition for certiorari was granted or considered.

### **2. Prior Notice of Antigua Proceedings**

Howard Kennedy acknowledge receipt of the Amended Statement of Claim in October 2025 and were formally served in England in December 2025 in enforcement proceedings arising from the same U.S. judgment. They therefore had actual notice of the Antigua proceedings before writing to this Court.

### **3. Active Enforcement Role**

Howard Kennedy act for Mahim Khan in English enforcement proceedings arising from the same U.S. judgment. The sealed English Order dated 19 January 2026 confirms they were served as solicitors in those proceedings, contradicting their attempt to portray themselves as uninvolved third parties.

### **4. Attempt to Influence Without Submitting**

Howard Kennedy wrote to influence this Court's jurisdictional hearing while expressly refusing to submit to jurisdiction and declining to appear.

### **5. Relevance to Credibility**

These matters are placed before the Court as they materially affect the reliability and credibility of representations made in advance of jurisdictional determination.

Digitally signed,

**Alkiviades David**

Claimant in Person – Disabled Litigant

Digital Signature: Alkiviades David