

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION
Claim No: KB-2025-001991**

MAHIM KHAN

Claimant / Judgment Creditor

- and -

ALKIVIADES DAVID also known as ALKI DAVID

Defendant / Applicant / Litigant in Person



URGENT SUPPLEMENTAL NOTICE AND WITNESS STATEMENT

In Support of N244 / Part 23 Application for Record-Safety Directions Before Final Enforcement

Date	28 April 2026	KB-2025-001991
Related context	ANUHCV2025/0149; CA-2025-002562 where relevant	
Applicant	Alkiviades David, Litigant in Person	
Address for service	SwissX Island, St. John's, Antigua & Barbuda	
Email	ceo@swissx.com	

The Court does not need to accept every allegation to act safely. It need only preserve first, clarify first, accommodate first, control the bundle judicially, and pause final enforcement until the record is complete, auditable, disability-compliant, and fair.

Primary relief: stay / adjournment, CE-File status clarification, preservation, reasonable adjustments, and judicial bundle control. Strike-out or dismissal is sought only in the alternative.

LEGAL HOOK AND ORDER SOUGHT AT A GLANCE

This application is made under CPR Part 23 and the Court's case-management powers. Insofar as enforcement is concerned, the Applicant relies on special circumstances making final enforcement unsafe or inexpedient until the record is clarified, preserved, and made disability-compliant, reflecting the principles of CPR 83.7.

Immediate issue	Evidence pathway	Practical order sought
CE-File uncertainty	AD-1 to AD-10	Confirm status of 26 filings; preserve metadata and audit logs.
"On record" ambiguity	AD-17	Confirm what Mr Eves meant and where materials are indexed.
TBI prejudice	AD-21 to AD-22	Reasonable adjustments; written directions; no adverse inference.
Bundle control	AD-19, AD-30 to AD-31	Howard Kennedy to identify proposed exclusions; Court decides disputes.
Underlying California record safety	AD-23 to AD-28, AD-37	Preservation and enforcement caution; no merits retrial.
HARMONIA / Antigua record	AD-12, AD-12A, AD-36	Preserve and index; no findings on ownership today.
Safeguarding	AD-16, AD-29	Sealed handling only; no open circulation of sensitive material.

WHAT THE APPLICANT IS NOT ASKING FOR

- The Applicant is not asking the Court to retry California.
- The Applicant is not asking the Court to decide Antigua.
- The Applicant is not asking the Court to determine HARMONIA ownership today.
- The Applicant is not asking the Court to make criminal findings.
- The Applicant is not asking the Court to determine professional negligence.
- The Applicant asks for record clarification, preservation, disability accommodations, judicial bundle control, and a pause before final enforcement.

IMPORTANT LIMITATION

This filing is made for protective civil relief before final enforcement.

The Applicant does not ask this Court at this stage to retry the California proceedings, decide the Antigua proceedings, determine Privy Council or CID matters, adjudicate the circumstances of Asot Michael's death, determine HARMONIA ownership, determine professional negligence, or make criminal findings.

The issue is narrow and urgent: whether it is safe, fair, and disability-compliant to make final English enforcement orders while CE-File status, court-record visibility, medical disability prejudice, bundle control, HARMONIA preservation, omitted-evidence concerns, and cross-jurisdictional record-safety issues remain unresolved.

I am not asking for special treatment. I am asking for a fair chance to be heard on a complete record. As a disabled litigant in person with documented brain injury, I cannot safely participate in final enforcement proceedings if I cannot see, verify, or understand what is actually before the Court. The present uncertainty has caused real distress, confusion, exhaustion, humiliation, and prejudice. The record must be safe before enforcement becomes final.

A. RELIEF SOUGHT

The Applicant respectfully seeks the following urgent protective directions:

- 1 This application shall be placed before an independent Master or High Court Judge for urgent judicial consideration.
- 2 Pending determination of this application, no final Third Party Debt Order, Charging Order, contempt-related step, default-related step, seizure, asset-transfer, receivership, or other adverse enforcement step shall be taken against the Applicant.
- 3 The Court shall direct urgent CE-File / C-Track record-status clarification, including confirmation of: (a) the status of each of the Applicant's 26 CE-File / C-Track submissions dated 28 April 2026; (b) whether each filing was received, accepted, rejected, pending, held, omitted, hidden, reclassified, or placed before a judicial officer; (c) the status and location of materials which Mr Jonathan Eves stated had been placed "on record"; (d) whether any materials are internally on the Court record but not visible to parties on CE-File; (e) the status of any paid application, including the recusal / independent allocation application; (f) the materials to be included in the 18 May 2026 hearing bundle; and (g) any Applicant materials Howard Kennedy LLP proposes to exclude, with short written reasons.
- 4 The Court shall preserve all CE-File metadata, audit logs, rejected filings, filing receipts, access-permission logs, support tickets, call notes, payment records, staff notes, internal correspondence, and communications concerning the Applicant's filings.
- 5 Howard Kennedy LLP shall be directed to provide a proposed hearing bundle index and identify any Applicant materials it proposes to exclude, together with short reasons, so that disputed inclusion can be determined by the Court rather than by unilateral bundle control.
- 6 No party, solicitor, clerk, court officer, administrative officer, or staff member shall treat any disputed material as irrelevant, excluded, invisible, rejected, informal, or outside the record unless and until a Judge has so ruled.
- 7 The Applicant shall be granted reasonable adjustments for his documented Traumatic Brain Injury, including clear written directions, written filing-status confirmations, permission to file by email where CE-File access is impaired, extended time where necessary, permission to use written speaking notes, permission for a support person or McKenzie Friend to assist with bundle navigation and note-taking, and no adverse inference from disability-linked sequencing, repetition, volume, timing, formatting, emotional intensity, or CE-File difficulty.
- 8 Any safeguarding-sensitive material, including CAMILA / NXIVM material, hash-match material, filenames, digital indicators, victim-related material, or suspected child-protection material, shall not be placed in an open public bundle or circulated by email unless the Court expressly directs. Such material shall be handled only by sealed / confidential court direction or appropriate safeguarding / law-enforcement referral.
- 9 Further or alternatively, the Claimant's application for final enforcement relief shall be struck out, dismissed, or adjourned unless the Court is satisfied that the record before it is complete, auditable, disability-compliant, and fairly indexed.
- 10 In the alternative, all final enforcement relief shall be stayed or adjourned pending CE-File status confirmation, record preservation, reasonable adjustments, and judicial determination of disputed bundle contents.
- 11 Costs reserved.

B. GROUNDS

- 1 This is a record-safety application before final enforcement.

- 2 The Applicant is deeply concerned that enforcement may proceed before the court record is clarified, preserved, made visible, and made disability-compliant.
- 3 CE-File / court-record visibility is the central issue. The Applicant identified 26 CE-File / C-Track submissions made on 28 April 2026. The Applicant requires confirmation of their status and whether they were received, accepted, rejected, pending, held, omitted, hidden, reclassified, or placed before a judicial officer.
- 4 The Applicant relied on representations made by Mr Jonathan Eves that the Applicant's filings were "on record." The visible record appears inconsistent with those representations, and the Applicant respectfully asks the Court to clarify what "on record" means, where those materials are located, and whether they have been placed before a judicial officer.
- 5 The Applicant's serious Traumatic Brain Injury is a mandatory access-to-justice and reasonable-adjustments issue. The Court should not draw adverse inferences from symptoms of the disability for which accommodation is sought.
- 6 Howard Kennedy LLP appears to be preparing the hearing bundle and may exclude materials it considers irrelevant. Where record integrity, disability access, HARMONIA preservation, omitted-evidence issues, and enforcement fairness are live issues, disputed inclusion should be determined by the Court.
- 7 The Applicant relies on California underlying-record materials, HARMONIA / Charles Russell Speechlys / 4 Wilton Place materials, original Antigua court materials, and Glaser Weil / Fred Heather / Chastity Jones / Carl Dawson / Chora enforcement materials solely for preservation, record-integrity, bundle-control, asset-preservation, omitted-evidence, disability / ADA evidence-routing, and enforcement-caution purposes.
- 8 The Applicant does not ask this Court to retry California, determine professional negligence, determine the full Antigua claim, or make findings against Glaser Weil, Fred Heather, Joseph Chora, or any other person.
- 9 Safeguarding / child-protection materials, including CAMILA / NXIVM context, raise protective issues that should be preserved and handled safely. The Applicant does not ask the Court to make criminal findings on this application.
- 10 If the Applicant is wrong, a short stay, record clarification, and judicial bundle control cause limited prejudice. If the Applicant is right, final enforcement on an unsafe, incomplete, invisible, or disability-unfair record may cause serious and potentially irreversible prejudice.

C. PREJUDICE AND HUMAN IMPACT

The prejudice to me is not abstract. It is personal, procedural, medical, and potentially irreversible.

I am a disabled litigant in person with documented Traumatic Brain Injury. My medical evidence records head trauma, memory loss, significant frontal encephalomalacia with gliosis, and frontal volume loss. I am trying to participate in complex litigation across jurisdictions while managing a brain injury that affects memory, sequencing, processing speed, stress response, concentration, and electronic filing.

When the Court record is unclear, invisible, incomplete, or controlled through a process I cannot verify, the prejudice is severe. I cannot know what the Court has seen. I cannot know what has been rejected. I cannot know what has been placed before a Judge. I cannot know what Howard Kennedy proposes to exclude. I cannot know whether materials I was told were "on record" are actually on the record in any meaningful way.

That uncertainty is disabling.

This is not simply an administrative inconvenience. For someone with my medical condition, an unstable or invisible court record creates extreme stress, confusion, and disadvantage. It turns every filing into a guessing exercise. It forces me to repeat myself. It makes me appear disorganised when I am trying to protect the record. It risks converting the symptoms of my disability into alleged procedural failure.

I respectfully ask the Court not to punish me for the very symptoms of the disability for which I seek accommodation.

The emotional impact is profound. I have repeatedly tried to place materials before the Court. I have paid fees, filed documents, sent emails, relied on confirmations, and attempted to comply. Yet I remain in the position of not knowing what is actually before the Court. That creates fear, humiliation, exhaustion, and a serious sense that my voice, my evidence, and my disability are being treated as invisible.

The enforcement prejudice is equally serious. If final enforcement proceeds now, before the record is clarified and made auditable, I may suffer consequences that cannot realistically be repaired later. Assets may be frozen, charged, seized, transferred, or used as leverage before the Court has confirmed that it is acting on a complete and fair record.

That is why I seek a pause. Not to delay for delay's sake. Not to avoid scrutiny. Not to ask the Court to accept every allegation. I seek a pause because the record must be safe before enforcement becomes final.

The safeguarding prejudice is also serious. Some materials concern child-protection and safeguarding context. I am not asking the Court to make criminal findings. I am asking that sensitive material not be buried, mishandled, casually circulated, or excluded administratively before a Judge decides how it should be treated.

The HARMONIA and Antigua materials also create prejudice if ignored. I do not ask this Court to decide the Antigua claim or HARMONIA ownership today. I ask that the original record, provenance materials, service materials, and

cross-jurisdictional preservation materials be indexed and preserved before irreversible English enforcement proceeds. The original Antigua claim form is useful as an anchor record because it shows the filed source document and original party list.

The omitted-evidence and downstream-enforcement pathway also creates prejudice. I rely on AD-37 only to show why the underlying California record and downstream enforcement history require caution before final English enforcement. I do not ask this Court to determine professional negligence or retry California. I ask only that the materials be preserved, indexed, and considered for record-safety and enforcement-caution purposes.

The Court does not need to decide every allegation to protect fairness. It only needs to ensure that the record is complete, auditable, disability-compliant, and judicially controlled before final enforcement is allowed to continue.

For those reasons, I respectfully ask the Court to preserve first, clarify first, accommodate first, control the bundle judicially, and pause final enforcement until the record is safe.

D. EVIDENCE PATHWAYS

The Applicant provides the following evidence pathways to assist the Court. These pathways are not advanced as findings of fact. They are provided to show why preservation, clarification, disability accommodation, judicial bundle control, and enforcement caution are required before final enforcement.

Evidence Pathway 1 - CE-File / Court-Record Safety

Issue	Whether the Court is proceeding on a complete, visible, auditable record.
Core question	What has actually been filed, accepted, rejected, hidden, held, omitted, or placed before a Judge?
Key materials	HMCTS support materials; CE-File / C-Track filing confirmations; 26 filings made on 28 April 2026; payment and filing receipts; Mr Eves' "on record" emails; Howard Kennedy LLP CE-File visibility materials.
Relief supported	CE-File audit, record-status confirmation, metadata preservation, no final enforcement until record status is clear.

Evidence Pathway 2 - TBI / Disability Access

Issue	Whether a disabled litigant in person can fairly participate without a stable and verifiable record.
Core question	Can final enforcement proceed fairly where the Applicant's documented brain injury affects memory, sequencing, processing, stress response, and electronic filing?
Key materials	MRI brain report; further brain-scan materials; confidential medical note; disability impact statement.
Relief supported	Reasonable adjustments, no adverse inference from disability-linked presentation, written directions, filing-status confirmations, extended time where necessary.

Evidence Pathway 3 - Eves / Howard Kennedy / Bundle Control

Issue	Whether court-record visibility and bundle content are being controlled fairly.
Core question	If Mr Eves said materials were "on record," and Howard Kennedy may prepare the bundle while excluding materials it deems irrelevant, who controls what the Judge sees?
Key materials	Eves "on record" emails; Howard Kennedy CE-File visibility letter; Howard Kennedy service / notice evidence; Howard Kennedy Antigua response materials; service certificate showing Howard Kennedy LLP served in ANUHCV2025/0149.
Relief supported	Judicial bundle control, proposed bundle index, short reasons for exclusions, disputed inclusion to be determined by the Court.

Evidence Pathway 4 - California Underlying Record / Enforcement Caution

Issue	Whether English enforcement should proceed irreversibly where underlying record-integrity concerns are live.
Core question	Should the Court enforce finally before preserving and considering witness-use and exhibit-list integrity concerns?
Key materials	Calendar affidavit; Garofalo / Venable exhibit-list integrity materials; Shoefield statement; Rizzo / Chastity / Elizabeth communications bundle.
Relief supported	Enforcement caution, preservation, indexed inclusion, no final enforcement until record-safety issues are addressed.

Evidence Pathway 4A - Glaser Weil / Fred Heather / Chastity Jones / Carl Dawson / Chora Enforcement

Issue	Whether the underlying California record and later enforcement pathway were safe enough to support final English enforcement.
Core question	Should final English enforcement proceed where the Applicant says key contradictory witness material, medical / ADA material, and counsel-held evidence were omitted, buried, or not properly deployed before downstream enforcement occurred?
Key materials	Glaser Weil / Fred Heather supplemental note; Chastity Jones / Mary Rizzo / MK contradiction pathway; Carl Dawson pathway; Patricia Glaser / Fred Heather emails; medical / ADA material routed to Fred Heather; Joseph Chora downstream enforcement materials.
Relief supported	Preservation, underlying-record safety, counsel-file preservation, disability / ADA evidence-routing preservation, enforcement caution, and no final English enforcement until the record is complete, auditable, disability-compliant, and fairly indexed.

Evidence Pathway 5 - HARMONIA / Charles Russell Speechlys / 4 Wilton Place

Issue	Whether disputed provenance and asset-preservation materials should be preserved before irreversible enforcement.
Core question	Should HARMONIA / 4 Wilton Place / trust-control materials be excluded or ignored before a Judge decides their relevance?
Key materials	HARMONIA / Charles Russell Speechlys / 4 Wilton Place record-integrity materials; HARMONIA visual case-management map; original Antigua Claim Form / Statement of Claim filed 17 April 2025.
Relief supported	HARMONIA preservation, judicial indexing, no administrative exclusion, no unilateral bundle-control exclusion.

Evidence Pathway 6 - Safeguarding / CAMILA / NXIVM

Issue	Whether sensitive safeguarding material must be preserved and handled safely.
Core question	How should the Court ensure that safeguarding-sensitive material is not buried, mishandled, or circulated improperly?
Key materials	Sealed safeguarding index; CAMILA / NXIVM public-source sentencing article; any sensitive material only by sealed / confidential direction or appropriate safeguarding / law-enforcement referral.
Relief supported	Sealed handling, no open circulation, preservation, safe referral, no administrative exclusion.

Evidence Pathway 7 - Antigua / Privy Council / CID / UPP / Scotland Yard UK Nexus

Issue	Whether related cross-jurisdictional preservation efforts and formal notices support enforcement caution.
Core question	Should English enforcement proceed finally before the cross-jurisdictional record is preserved and indexed?
Key materials	Original Antigua claim; Antigua transcript / captions of 16 January 2026; UPP notice / contempt / directions materials; Master Affidavit and CID / Privy Council Notice; Scotland Yard investigative memorandum concerning Asot Michael-related lawyer and intermediary communications.
Relief supported	Comity, preservation, UK nexus, communications mapping, enforcement caution, disability-aware handling.

E. PROPOSED ORDER

IN THE HIGH COURT OF JUSTICE

KING'S BENCH DIVISION

Claim No: KB-2025-001991

DRAFT ORDER

UPON the urgent application of the Defendant / Applicant dated 28 April 2026;

AND UPON reading the Applicant's N244 application, Witness Statement, Supplemental Notice, Evidence Pathways, and Exhibit Index;

AND WITHOUT making any criminal finding or determining the merits of the wider dispute;

IT IS ORDERED THAT:

- 1 This application shall be referred urgently to an independent Master or High Court Judge.
- 2 All enforcement steps, including final Third Party Debt Orders, Charging Orders, seizure, asset-transfer, contempt-related steps, default-related steps, and any other adverse procedural steps against the Applicant are stayed pending further order.
- 3 The Court shall confirm the status of each of the Applicant's 26 CE-File / C-Track submissions dated 28 April 2026, including whether each was accepted, rejected, pending, held, omitted, hidden, reclassified, or placed before a judicial officer.
- 4 The Court shall identify and confirm the status and location of the emails and documents which Mr Jonathan Eves stated had been put "on record."
- 5 The Court shall confirm whether any materials are internally on the Court record but not visible to parties on CE-File.
- 6 All CE-File metadata, audit logs, rejected filings, filing receipts, support tickets, call notes, access-permission logs, payment records, internal correspondence, staff notes, and communications relating to the Applicant's filings shall be preserved.
- 7 The Court shall confirm the status of any paid application, including any recusal / independent allocation application.
- 8 The Court shall provide or direct a clear index of what materials are presently treated as being on the Court record for the 18 May 2026 hearing.
- 9 Howard Kennedy LLP shall provide a proposed hearing bundle index and identify any Applicant materials it proposes to exclude, together with short written reasons.
- 10 Any dispute about inclusion of Applicant materials in the hearing bundle shall be determined by the Court.
- 11 No party, solicitor, court officer, clerk, administrative officer, or staff member shall treat disputed material as irrelevant, excluded, invisible, rejected, informal, or outside the record unless and until a Judge has so ruled.
- 12 The Applicant shall be granted reasonable adjustments for documented Traumatic Brain Injury, including clear written directions, written filing-status confirmations, permission to file by email where CE-File is impaired, reasonable extensions where necessary, permission to use written speaking notes, and permission to have a support person or McKenzie Friend assist with bundle navigation and note-taking.
- 13 No adverse inference shall be drawn from disability-linked sequencing, repetition, volume, timing, formatting, emotional intensity, or CE-File difficulty until the Court has considered the Applicant's medical evidence and reasonable-adjustment needs.
- 14 The Applicant shall have permission to rely on HARMONIA / Charles Russell Speechlys / 4 Wilton Place materials for the limited purpose of preservation, record-integrity, bundle-control, asset-preservation, and enforcement caution.
- 15 The Applicant shall have permission to rely on the original Antigua Claim Form / Statement of Claim filed on 17 April 2025 for the limited purpose of showing the original filed record, original party list, jurisdictional pleading, record-integrity concerns, comity, preservation, and enforcement caution.
- 16 The Applicant shall have permission to rely on California underlying-record materials for the limited purpose of witness-use concerns, exhibit-list integrity concerns, bundle-control concerns, and enforcement caution. The Court is not asked to retry California.
- 17 The Applicant shall have permission to rely on the Glaser Weil / Fred Heather / Chastity Jones / Carl Dawson / Chora Enforcement Supplemental Note for the limited purpose of showing underlying California record-integrity concerns, omitted-evidence concerns, disability / ADA evidence-routing concerns, counsel-file preservation issues, and enforcement caution. The Court is not asked on this application to retry California, determine professional negligence, or make professional-misconduct findings.

- 18 The Applicant shall have permission to rely on Antigua, Privy Council, CID, Scotland Yard, and safeguarding-context materials for the limited purpose of preservation, comity, notice, service-history, UK nexus, communications mapping, sealed-handling caution, and enforcement caution.
- 19 Any safeguarding-sensitive CAMILA / NXIVM material, hash-match material, filenames, digital indicators, victim-related material, or suspected child-protection material shall not be placed in an open public bundle or circulated by email unless the Court expressly directs. Such material shall be handled only by sealed / confidential Court direction or appropriate safeguarding / law-enforcement referral.
- 20 Further or alternatively, the Claimant's application for final enforcement relief shall be struck out, dismissed, or adjourned unless the Court is satisfied that the record before it is complete, auditable, disability-compliant, and fairly indexed.
- 21 In the alternative, all final enforcement relief shall be stayed or adjourned pending CE-File status confirmation, record preservation, reasonable adjustments, and judicial determination of disputed bundle contents.
- 22 The matter shall be listed for an urgent directions hearing before an independent Master or High Court Judge.
- 23 Costs reserved.

F. EXHIBIT INDEX / EVIDENCE PATHWAYS

A. CE-File / Court-Record Safety

- AD-1 to AD-10 - HMCTS support materials, CE-File / C-Track filing confirmations, filing-status tables, screenshots, paid fee records, support-call records, Eves "on record" emails, and Howard Kennedy CE-File visibility materials.

B. Disability / Reasonable Adjustments

- AD-21 - MRI Brain Report.
- AD-21B - Further brain scan email / imaging screenshot.
- AD-22 - Confidential medical note.

C. California Underlying Record / Enforcement Caution

- AD-23 - Elane / Yelena Calendar Affidavit.
- AD-24 - Venable / Garofalo exhibit-list integrity materials.
- AD-25 - Gary Shoefield Statement.
- AD-26 - Rizzo / Chastity / Elizabeth communications.
- AD-28 - 16 January 2026 Antigua transcript / captions referencing filings, comity, and filing uncertainty.
- AD-37 - Glaser Weil / Fred Heather / Chastity Jones / Carl Dawson / Chora Enforcement Supplemental Note.

D. HARMONIA / Charles Russell Speechlys / 4 Wilton Place

- AD-12 - HARMONIA / Charles Russell Speechlys / 4 Wilton Place record-integrity and alleged asset-capture materials.
- AD-12A - HARMONIA visual case-management map.
- AD-36 - Original Antigua Claim Form / Statement of Claim filed 17 April 2025.

E. Safeguarding-Sensitive Materials

- AD-16 - Sealed Safeguarding Index only.
- AD-29 - CAMILA / NXIVM public-source safeguarding article.

F. Howard Kennedy / Service / Notice / Bundle Control

- AD-19 - Antigua Response to Howard Kennedy LLP letter.
- AD-30 - Certificate of Service on Howard Kennedy LLP / Rebecca Hume / Ajay Fournillier.
- AD-31 - Antigua Statement of Service / Service Matrix.

G. Antigua / Privy Council / CID / UPP / UK Nexus

- AD-32 - UPP Reissued Motion for Contempt with Annex JL-1.
- AD-33 - Antigua Notice of Contempt / Actual and Constructive Notice / Application for Directions.
- AD-34 - Master Affidavit and CID / Privy Council Notice.
- AD-35 - Scotland Yard Investigative Memorandum.

G. IMAGE SCHEDULE

The images below are visual aids only. They are included to make the record easier to navigate. The underlying exhibits control, and no image is advanced as a substitute for the full exhibit or as a finding of fact.

Image 1 - CE-File / Filing Confirmation Pathway

IN THE HIGH COURT OF JUSTICE
 KING'S BENCH DIVISION
 Claim No: KB-2025-001991

BETWEEN:

MAHIM KHAN
 Claimant

-and-

ALKIVIADES DAVID also known as ALKI DAVID
 Defendant / Litigant in Person

DEFENDANT'S NOTICE REGARDING CE-FILE ACCESS, FILING CONFIRMATIONS, PAID APPLICATIONS, RECORD INTEGRITY, DISABILITY ACCESS, SAFEGUARDING MATERIALS, HARMONIA RECORD ISSUES, PUBLIC NOTICE, AND REQUEST FOR DIRECTIONS

Filed by:	Alkiviades David, Defendant, Litigant in Person
Date:	28 April 2026
Hearing:	18 May 2026 at 14:00 UK time
Before:	Senior Master Cook
Purpose:	Final Third Party Debt Order and Final Charging Order

1. Purpose of this Notice

1. I file this Notice urgently to place on the Court record a serious issue concerning CE-File access, filing visibility, filing confirmations, paid CE-File applications, disability access, safeguarding materials, HARMONIA record issues, and the completeness of the record before the Court.
 2. This Notice is filed in response to: (a) HMCTS E-Filing Technical Support correspondence on 28 April 2026; (b) multiple CE-File / Thomson Reuters / C-Track filing submission confirmations received by me on 28 April 2026; (c) Howard Kennedy LLP's letter dated 28 April 2026; (d) the relisted Notice of Hearing dated 28 April 2026; (e) my continuing concern that important filings, applications, skeleton argument materials, exhibits, correspondence, disability-access materials, safeguarding evidence, and HARMONIA materials are not visible to me on CE-File; and (f) my filed application concerning judicial recusal / recusal of the judge.
 3. I am a litigant in person with a documented traumatic brain injury. The ability to see, file, verify, and respond to the record is essential to my effective participation in these proceedings.

2. The Immediate Issue

4. Earlier today, HMCTS E-Filing Technical Support informed me, in substance, that the system showed I had not filed documents on KB-2025-001991 and that this was why I could not properly search or view the case from my account.
 5. However, later the same day, I received multiple CE-File / Thomson Reuters / C-Track filing submission confirmations for KB-2025-001991.
 6. This creates a direct and serious procedural uncertainty. If CE-File confirms filings have been submitted, then there must be a corresponding technical record, filing number, submission number, metadata trail, and administrative status.
 7. The issue is no longer whether I attempted to file. The issue is whether those filings are accepted, rejected, pending, held, reclassified, not visible, or otherwise not placed before the Court.

2A. Recorded HMCTS Technical Support Call and Access Restriction

7A. I also place on record that, during a recorded conversation with HMCTS E-Filing Technical Support on 28 April 2026, I was informed in substance that my access to KB-2025-001991 had been blocked or restricted and that I had not previously been approved / enabled to access the CE-File record in the ordinary way.

Visual index of CE-File / C-Track record-integrity materials. The Applicant asks the Court to confirm filing status and preserve metadata.

Image 2 - Medical / Brain Injury Evidence Pathway



Self Referral

Name: David, Alkiviades
MRN #: 376807
DOB: 05/23/1968
Exam Date: 04/01/2023 17:26
Referring Phys.: Self Referral

MRI OF THE BRAIN WITHOUT CONTRAST

HISTORY

This is a 54-year-old male with a history of head trauma. The patient has memory loss.

TECHNIQUE

This study was performed at Medical Imaging Center of Southern California, Santa Monica.

Using a 3 Tesla Siemens Verio MRI Open system, the following sequences were obtained:

- 1) Localizer.
- 2) T1-weighted 3D MPRAGE.
- 3) T2 TSE axial.
- 4) 3D double inversion recovery.
- 5) T2 FLAIR sagittal, axial, and coronal.
- 6) DWI axial.
- 7) SWI axial.

FINDINGS

There is a large focal area of encephalomalacia with associated white matter gliosis in the medial frontal lobe on the left. There is considerable volume loss and encephalomalacia, which will be better evaluated on the advanced imaging study Neuroquant report. This likely is an injury of some longstanding.

The remainder of the gray matter, white matter, brainstem, and cerebellum are normal.

There is mucoperiosteal thickening and opacification of the right anterior ethmoidal air cells.

The extracranial soft tissues, sinuses, and skull base structures are otherwise normal.

IMPRESSION

1. Significant left frontal encephalomalacia with gliosis in the deep white matter involving the paramedian frontal lobe.
2. There is frontal volume loss, greater on the right than on the left.
3. There is opacification of the right frontal ethmoidal sinus.

summary pages



Santa Monica
 2811 Wilshire Blvd., Ground Floor
 Santa Monica, CA 90402
 Tel: (310) 424-9700 Fax: (310) 424-4626
Beverly Hills
 8777 Beverly Blvd.,
 Beverly Hills, CA 90214
 Tel: (424) 355-0437 Fax: (888) 442-7220



Medical evidence pathway. Relied upon only for reasonable adjustments and disability-compliant case management.

Image 3 - Howard Kennedy Service / Notice Evidence

[Click here to reset form](#)
[Click here to print form](#)

Certificate of service

Name of court High Court of Justice – Antigua and Barbuda	Claim No. ANUHCV/2025/0149
Name of Claimant Alkiviades David	
Name of Defendant (1) Rebecca Hume, (2) Ajay Fournillier, (3) Howard Kennedy LLP	

On what day did you serve? 08/10/2025
The date of service is 08/10/2025

What documents did you serve?
Please attach copies of the documents you have not already filed with the court.
 1. Claim Form and exhibits 2. Particulars of Claim QR Code - ANUHCV2025/0149

On whom did you serve?
(If appropriate include their position e.g. partner, director).
 (1)Rebecca Hume, (2) Ajay Fournillier,(3)Howard Kennedy LLP

How did you serve the documents?
(please tick the appropriate box)

by first class post or other service which provides for delivery on the next business day

by delivering to or leaving at a permitted place

by personally handing it to or leaving it with (13:30 time left, where document is other than a claim form) (please specify)

by other means permitted by the court (please specify)

by Document Exchange

by fax machine (..... time sent, where document is other than a claim form) (you may want to enclose a copy of the transmission sheet)

by other electronic means (..... time sent, where document is other than a claim form) (please specify)

Give the address where service effected, include fax or DX number, e-mail address or other electronic identification

1 London Bridge, London SE1 9BG

Being the claimant's defendant's
 solicitor's litigation friend

usual residence
 last known residence
 place of business
 principal place of business
 last known place of business
 last known principal place of business
 principal office of the partnership
 principal office of the corporation
 principal office of the company
 place of business of the partnership/company/ corporation within the jurisdiction with a connection to claim
 other (please specify)

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

Full name: Mark Walsh

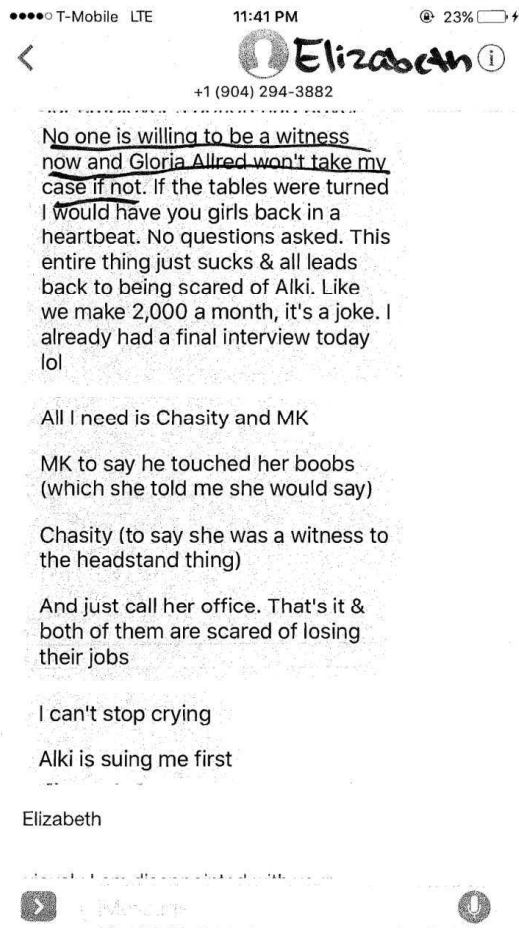
Signed: *Mark Walsh* Position or office held: Process Server
(Claimant) (Defendant) (solicitor) (s litigation friend) (If signing on behalf of firm or company)

Date: 08/10/2025

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Service / notice pathway involving Howard Kennedy LLP and related persons. Relied upon only for notice, service-history, cross-jurisdictional record-integrity, and bundle-control concerns.

Image 4 - Witness-Use / Statement Integrity Pathway

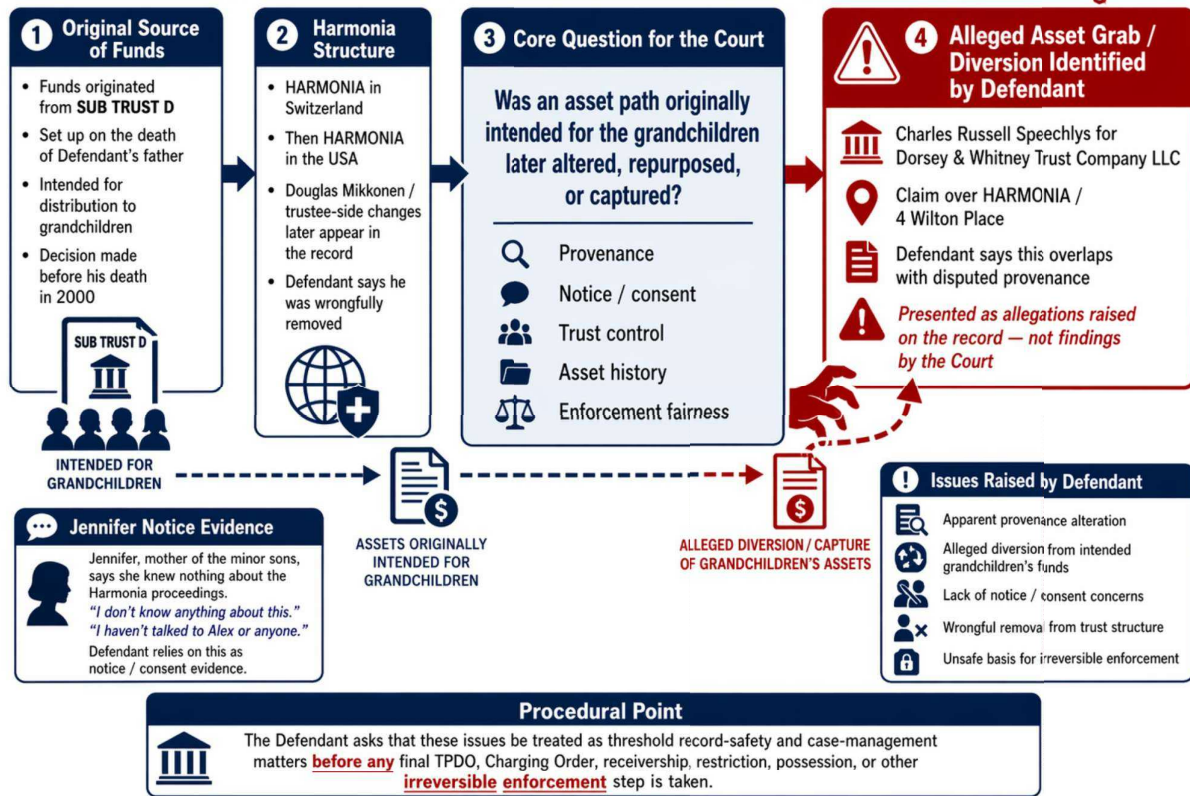


Underlying-record evidence pathway concerning witness-use, statement pressure, and exhibit-list integrity. Not advanced to retry California.

Image 5 - HARMONIA Visual Case-Management Map

HARMONIA – Alleged Diversion of Grandchildren’s Trust Assets

Defendant’s case theory for case-management purposes only – **allegations, not findings**



Visual summary of the Defendant’s allegations from materials said to be on the record.

Visual summary of the Applicant’s case theory for preservation, record-safety, provenance, asset-history, and enforcement-caution purposes only. Allegations, not findings.

Image 6 - Original Antigua Claim Form / Filed Stamp

Case Number : ANUHCV2025/0149

IN THE HIGH COURT OF JUSTICE

ANTIGUA AND BARBUDA

Claim No: [To be assigned by Registry]

BETWEEN:

ALKIVIADES DAVID

of SwissX Island, St. John's, Antigua & Barbuda

Claimant

— AND —

1. DAVID BOIES, of Boies Schiller Flexner LLP
2. GLORIA ALLRED, of Allred, Maroko & Goldberg
3. DANI PERETZ, of Geneva, Switzerland & Tel Aviv, Israel
4. SHARI REDSTONE, of Paramount Global, and Caribbean Holdings
5. DAPHNE BARAK, of Beverly Hills, California and Tel Aviv, Israel
6. MICHAEL AVENATTI, formerly of Eagan Avenatti LLP
7. TOM GIRARDI, incarcerated at Federal Medical Center, Butner, North Carolina, USA
8. BLACK CUBE LTD, an Israeli-owned private intelligence agency based in London and Tel Aviv, Israel
9. LIMEWIRE NFT HOLDINGS, with assets and servers in the Caribbean
10. EDGAR BRONFMAN SR. (Deceased), estate with real property in St. Barthélemy
11. JOHN BRANCA, of West Hollywood and Jumbay Bay, Antigua
12. JOHN MCCLAIN, music executive, of Los Angeles and Bahamas
13. THE EXECUTIVE MEMBERS OF THE UNITED PROGRESSIVE PARTY (UPP), Antigua & Barbuda
14. And DOES 1-100

Defendants

STATEMENT OF CLAIM

1. Parties

The Claimant, Alkiviades David ("Claimant"), is a dual-national entrepreneur, human rights advocate, and founder of SwissX, operating a sovereign wealth initiative and biofuel enterprise in St. John's, Antigua & Barbuda.



Original Antigua Claim Form / Statement of Claim filed 17 April 2025 in ANUHCV2025/0149. Relied upon as the anchor document for original Antigua record and party list.

Image 7 - CAMILA / NXIVM Public-Source Safeguarding Context

4/15/26, 7:13 AM Years of Cruelty Recounted at Sentencing of NXIVM Sex Cult Leader | Courthouse News Service

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Years of Cruelty Recounted at Sentencing of NXIVM Sex Cult Leader

Moments before sentencing Keith Raniere to over a century in prison Tuesday, a federal judge rebuked the former sex cult leader's lawyer for arguing his client deserved a lesser sentence because "we're sentencing on his perspective."

NINA PULLANO / October 27, 2020



This still from a video in the YouTube series "Keith Raniere Conversations" shows the NXIVM leader who will begin trial May 7 on sex-trafficking and other charges.

<https://www.courtsenews.com/hours-of-cruelty-recounted-at-sentencing-of-nxivm-sex-cult-leader/> 1/5

Public-source safeguarding context only. No raw safeguarding-sensitive material is included.

Image 8 - CID / Privy Council Preservation Pathway

Master Affidavit and CID / Privy Council Notice

**IN THE JUDICIAL COMMITTEE OF THE PRIVY COUNCIL
AND FOR THE RECORD OF THE CRIMINAL INVESTIGATIONS DEPARTMENT
ANTIGUA AND BARBUDA**

ON APPEAL FROM THE EASTERN CARIBBEAN SUPREME COURT

Claim No. ANUHCV2025/0149
Related: KB-2025-001991 / CA-2025-002562

**MASTER AFFIDAVIT, CID REGISTRATION NOTICE,
AND SUPPORTING WITNESS MATERIALS**

OF

ALKIVIADES DAVID

Including reference to:


- SWISSX_MASTER_AFFIDAVIT_WITH_CITATIONS-1.pdf
 - The affidavit / witness materials of Shiley D. Hinton
 - Handwritten Royal Police Force of Antigua and Barbuda witness statement pages
- Prepared for filing, record preservation, and local CID formalisation

Dated: 22 April 2026
SwissX Island, Antigua and Barbuda

Page 1.

Relied upon only to show formal preservation efforts, cross-jurisdictional record context, disability-aware handling concerns, and enforcement caution.

Image 9 - Scotland Yard UK Nexus Memorandum



SWISSX ISLAND NETWORK
 Villa, St. John's, Antigua & Barbuda
 STRICTLY FOR INVESTIGATIVE ASSESSMENT AND PRESERVATION

Investigative Memorandum

Lawyer and Intermediary Communications Relevant to Asot Michael

TO	Metropolitan Police Service / Scotland Yard Specialist Crime / Investigating Officer
FROM	Alkiviades David SWISSX Island Network

Date: 9 April 2026

Executive note. This memorandum does not allege wrongdoing by any lawyer or firm. Its purpose is to preserve a factual communication trail that may assist lawful timeline reconstruction, witness identification, and non-privileged document tracing.

1. Purpose
 This memorandum is submitted to assist any lawful investigative assessment concerning communications, intermediaries, and professional-service channels connected to the late Asot Michael.
 The purpose is narrow and procedural: to preserve a factual chronology, identify a potentially relevant UK nexus, and flag non-privileged lines of inquiry that may assist investigators.

2. Core Point
 A review of my email records shows that Asot Michael was directly involved in facilitating contact between me and legal professionals, including a London law-firm contact and a United States law-firm channel.
 The significance is not the mere presence of lawyers. The significance is that this trail may help reconstruct who was communicating with whom, when those communications occurred, the purpose of the introductions, whether documents were transmitted, and whether meetings or calls were arranged.

3. Principal Persons Identified

- Asot Michael — asot@asotmichael.com
- Thomas K. Ragland — Clark Hill
- Romina Chavez — Clark Hill team
- Jonathan Grimes — Kingsley Napley LLP, London
- Faith Sharp — Clark Hill legal assistant

SWISSX ISLAND NETWORK | Villa, St. John's, Antigua & Barbuda | Investigative Memorandum

Relied upon only for UK nexus, communications mapping, factual preservation, and enforcement-caution purposes.

Image 10 - Glaser Weil / Fred Heather / Chora Enforcement Pathway

IN THE HIGH COURT OF JUSTICE KING'S BENCH DIVISION

Claim No: KB-2025-001991
Appeal No: CA-2025-002562

BETWEEN:
ALKIVIADES DAVID
Appellant / Applicant / Litigant in Person
— and —
MAHIM KHAN & OTHERS
Respondents

APPELLANT'S FINAL CONSOLIDATED SUPPLEMENTAL NOTE

(Glaser Weil file control, the Chastity Jones / Mary Rizzo / MK contradiction, the Carl Dawson omission, and the unsafe enforcement of an incomplete record)

This filing is advanced on a strictly procedural basis only. Its purpose is narrower and immediate: to show that the record underlying the California judgments was materially incomplete; that Glaser Weil, principally through Fred Heather, had or knew of contradictory witness material, medical / disability material, and support pathways that were not properly deployed; and that later Chora-led enforcement proceeded off that incomplete foundation.

The Applicant's central submission is that this was not an ordinary litigation path followed by ordinary enforcement. It was a path marked by contradictory witness formation, counsel-side omission, buried files, and downstream coercive collection activity. On that basis, coercive enforcement is unsafe unless and until the omitted-evidence problem is squarely addressed.

1. How Fred Heather entered and became central

The Applicant says that Fred Heather was introduced to him directly by Dani Peretz and the Applicant's sister Alexia, through the representation that Louis Freeh had recommended Fred Heather. The relevance of that evidence is structural: on the Applicant's case, Fred Heather did not arrive as independent outside counsel encountered at arm's length. He entered through an already connected family and legal channel, and was then placed at the centre of the Applicant's most sensitive litigation and evidentiary pathways.

The Applicant further says that Fred Heather became operationally central during the Mahim Khan trial itself, at the point when the proceedings had already become procedurally distorted.

2. The Mahim Khan trial was already structurally unsafe

Prepared PDF bundle

Visual index of AD-37. Relied upon only for omitted-evidence, disability / ADA routing, counsel-file preservation, and enforcement-caution purposes.

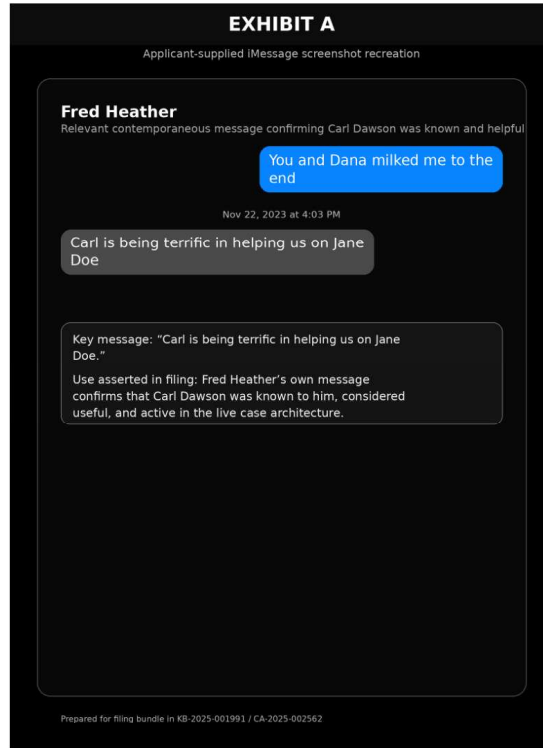
Image 10A - Fred Heather / Carl Dawson Excerpt

KB-2025-001991 / CA-2025-002562

Appellant's Final Consolidated Supplemental Note

EXHIBIT A

Fred Heather iMessage confirming Carl Dawson was known and helpful




Prepared for filing bundle — Senior Master Cook

Page 8

AD-37 exhibit image concerning the Carl Dawson / Fred Heather pathway. Included as a visual aid only.

H. STATEMENT OF TRUTH

I believe that the facts stated in this urgent supplemental notice and witness statement are true. I understand that proceedings for contempt of court may be brought against anyone 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.

Signed:	
Name:	Alkiviades David
Position:	Defendant / Applicant / Litigant in Person
Date:	28 April 2026

FINAL PROCEDURAL NOTE

The Court need not decide every allegation to act safely. It need only preserve first, clarify first, accommodate first, control the bundle judicially, and pause final enforcement until the record is complete, auditable, disability-compliant, and fair. AD-37 is relied upon only to show why the underlying California record and downstream enforcement pathway require caution before final English enforcement.