

14 November 2019

The Court Manager

Court of Appeal

Royal Courts of Justice

London

Re: Permission-to-Appeal Application for Family Court case MB19C01537 (CoA Ref: B4/2019/2288)

Dear Sir

The above subject refers.

May I please submit to your court that the 02/10/2019 B4/2019/2288 Court Order that was issued by the Court of Appeal is invalid (and therefore not legally binding) because I did not get to submit to the Court of Appeal an Approved Transcript of Judgement to support my Application to Appeal Recorder Bond's 06/09/2019 MB19C01537 Court Order before the Court of Appeal passed judgement on my case (a judgement that was quoting an Approved Transcript).

The B4/2019/2288 Court Order makes reference to a Transcript of Judgement but Master Bancroft Rimmer is quoted by an Associate in the Court of Appeal in letter dated 17/10/2019 as having said that "Lady Justice King clearly did not consider that a transcript of proceedings was required in order to determine this application."

Correspondence from the Family Court office dated 23rd October appears to indicate that the Transcript of Judgement that was before Lady Justice King was actually [Name of Local Authority] property produced by OPUS2 that I was unaware of and I had not had sight of. When I asked the Court of Appeal (in October email conversations with an Associate in the Court of Appeal), he referred me to the Family Court office, saying that the Court of Appeal was not in a position to supply me with electronic copy of the Transcript of Judgement that was before Lady Justice King when she passed judgement on B4/2019/2288. To date the Court of Appeal has not been able to demonstrate the procedures by which [Name of Local Authority] property that I had not had sight of got to the hands of Lady Justice King.

It is on the basis of the facts and reasoning explained above that I submit that there is a procedural defect surrounding the process followed by the Court of Appeal in determining my appeal of Recorder Bond's 06/09/2019 MB19C01537 Court Order, which renders the B4/2019/2288 Court Order null and void. My understanding of the Doctrine of Nullity is that the Court Order that is associated with a procedural defect is invalid ab initio and there is no need for me to appeal to have it set aside.

14th November 2019

B4/2019/2288 and the Doctrine of Nullity

I however am having to ask your court to please set aside the B4/2019/2288 judgement because according to the Doctrine of Nullity, the Court of Appeal themselves have the power to set aside their void Court Order.

I include with this correspondence copy of the 07/10/2019 N244 Application and Cover Letter that I had sent to the Court of Appeal to demonstrate how that I was clearly calling upon the Doctrine of Nullity when I submitted that request. A void Court Order is incurably void so Master Bancroft Rimmer's refusal to acknowledge the legal ineffect of Lady Justice King's B4/2019/2288 Court Order by refusing to officially set it aside does not change the fact that that Court Order is void. The Court Order itself, however, does not "bear the brand of invalidity on its forehead", and so [Name of Local Authority] are free to abuse it at will (which they are doing) until it is officially set aside. I believe that it is my right –ex debito justitiae – to have the B4/2019/2288 Court Order set aside.

Today I request that The Court of uphold my right (which has resulted in irreparable damage to our fragile family unit).

Thank you for bearing with me as I have been working on my MB19C01537 appeal efforts. I look forward to hearing back from you in due course.

Yours Sincerely

Bvumai Munosvikepi

Bvumai Munosvikepi

Enclosures:

- *B4/2019/2288 Court Order by Lady Justice King dated 02/10/2019.
- *Email conversation between Bvumai Munosvikepi & Associate (Court of Appeal).
- *07/10/2019 Email conversation between Bvumai Munosvikepi & Family Court Office.
- *07/10/2019 N244 Application and Cover Letter to the Court of Appeal.
- *Court of Appeal response dated 17th October 2019.
- *23/10/2019 Letter from the Family Court Office.

Please note that my MB19C01537 arguments and grounds of Resistance as presented ahead of the 06/09/2019 hearing and in my 09/09/2019 N244 Application would have the Doctrine of Nullity classify Recorder Bond's 6th September MB19C01537 Court Order as void on the grounds of Jurisdiction and procedural defects. Right now I am focussing on arguing the invalidity of the Court of Appeal's B4/2019/2288 Court Order and the Court of Appeal's refusal to honour my right - ex debito justitiae - to have the B4/2019/2288 Court Order set aside *Lord Greene in Craig v Kanssen [1943]*. There is no other court I can go to except yours, that is why I keep coming here.