

20 November 2019

The Court Manager

Court of Appeal

Royal Courts of Justice

Strand

London

WC2A 2LL

Re: B4/2019/2288 and CoA Ref: 2019/PI/12138

Dear Sir

My letter dated 14th November and your letter dated 18th November refers.

I am asking your Court to please set aside your own Court Order (the B4/2019/2288 Court Order issued by Lady Justice King) because I contend that the Court Order is not voidable, but void. I had not known before that some Court Orders are void ab initio and need not be appealed for them to be invalid hence my attempts to appeal Lady Justice King's Court Order.

The arguments that I was putting forward in support of my request to appeal though, clearly showed that the Court Order was in fact void (not voidable). Fortunately, it is never too late to raise the issue of nullity (which clearly applies here), because a void order is incurably void, that is why I come again to you to make clear that as regards to the B4/2019/2288 I am calling on the Doctrine of Nullity.

Your B4/2019/2288 proceedings lacked an element essential to the formation of the Court Order that resulted from them. There was no Approved Transcript of Judgement but yet Lady Justice King was clearly quoting one. Something cannot be founded on nothing. Please forgive my insistence but your Court is duty-bound to set aside that Court Order.

Your Exhaustion of Domestic Remedies Certificate is being returned because I have not exhausted the domestic remedies in this case; your court has the inherent jurisdiction to set aside that void Court Order and I have the right - ex debito justitiae - to have the B4/2019/2288 Court Order set aside.

As a litigant-in-person I may not have presented my argument using the precisely correct language but the bottom line is that the B4/2019/2288 Court Order falls foul of the Doctrine of Nullity and therefore is void ab initio. As you delay setting it aside, [Name of Local Authority]

cause my family irreparable damage; please uphold our human rights and set aside that Court Order without undue delay. You do not need to go into the merits of the MB19C01537 case itself.

I include with this correspondence an **N244** Application Form by way of Application along with supporting documents and **EX160** form .

Yours Sincerely

Bvumai Munosvikepi

Bvumai Munosvikepi

(Name anonymised)

Enclosures:

- *B4/2019/2288 Court Order by Lady Justice King dated 02/10/2019.
- *Email conversation between Bvumai Munosvikepi & an associate in the Court of Appeal.
- *07/10/2019 Email conversation between Bvumai Munosvikepi & Family Court Administration team.
- *10/10/2019 Letter to the Family Court Administration Team.
- *Court of Appeal response dated 17th October 2019.
- *23/10/2019 Letter from the Family Administration Team.
- *14/11/2019 Cover Letter to the Court of Appeal.

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, procedural defects and a lack of elements essential to its formation. 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]

Lord Denning in MacFoy v United Africa Co. Ltd. [1961]

Bellinger v Bellinger [2003] UKHL 21