



# MOOT PROPOSITION

**4TH NALSAR PUBLIC  
INTERNATIONAL LAW  
MOOT 2024**



**19TH -21ST  
JANUARY 2024**

***K. Denvers, N. Romanoff, and P. Quill v. The Federal Republic of Wakanda***

1. The Federal Republic of Wakanda, the Socialist State of Talokan, and the Principality of Sokovia are three States that form the Avengers Archipelago. The Avengers Archipelago consists of approximately five hundred islands and is surrounded by the East Wakandan Sea. This region is inhabited by Wakandan, Talokanian, Sokovian, Kree and Chitauri communities. This region has experienced a series of foreign aggression and century-long colonial domination by the Chitauris and Kreelanders.

2. The Federal Republic of Wakanda (“Wakanda”) occupies the largest share of the Avengers Archipelago. Its capital is situated in Infinity City, run by a parliamentary form of government. It has a powerful economy, and boasts one of the mightiest armies in the world. There is a rumour that it is secretly trying to develop nuclear weapons, an allegation that it always denied. It is inhabited by the Wakandan people (95%), Chitauri people (4.5%) and Kree people (0.5%). Though it has ratified major international law instruments including the 1951 Refugee Convention, its human rights policies, including minority-related policies are often criticised. Wakanda was a former Chitauri colony. However, it still maintains a good relationship with modern Chitauria after its decolonization.

3. The Socialist State of Talokan (“Talokan”) is the second largest State of the Avengers Archipelago. Its capital is in Quantumville, and it has a Presidential form of government. Its economy is dependent on the export of minerals and oils, including uranium. It is arguably the only State of the Avengers Archipelago with nuclear weapons. All the citizens of Talokan are obligated to provide military service to the State. The Kreetalian people form most of Talokan (80%) while Talokanian and Wakandan people form the rest of the population. Talokan is very reputed for receiving refugees and possesses a rich track record of providing shelter to many persecuted people.

4. The Principality of Sokovia (“Sokovia”) is a small principality in the Avengers Archipelago. It is reigned by the Kang dynasty. That dynasty was established by Kang the Conqueror during the last half of the eighteenth century. Its capital is Port Kang. It has a strong economy that depends on selling technology and weapons. It maintains an excellent relationship with Talokan. They concluded the Treaty of Mutual Friendship and Protection to substantiate their friendship. All the

citizens of Sokovia are of Sokovian origin. However, the Kang dynasty has faced some criticisms for its human rights record, including its use of “lesser magistrate” law.

5. Chitauris and Kreelanders were two nations of the Asgardian Continent. Following the Chitaurian colonisation of Wakanda in 1857 and with the resources allegedly looted from there, it planned to expand its territory to the Kingdom of Kreeland (“Kreeland”) and started conducting regular wars. While Kreeland succeeded in colonising Talokan, it was subsequently annexed to the Kingdom of Chitauria (“Chitauria”) in 1899. Now, it is a federal State and is very sensitive to climate change issues. It actively takes part in climate change-related issues at the international fora. Notably, it has adopted universal criminal jurisdiction legislation to prosecute and punish international crimes, including ecocide. Its definition of ecocide is a verbatim adoption of the proposition of the *Stop Ecocide International*.

6. Before the advent of the colonisers from the Asgardian continent, this region witnessed frequent armed conflicts and the territorial boundaries of the composite States of the Avengers Archipelago changed at regular intervals. The volatile situation of this region invited the Kingdom of Kreeland to intervene. First, it sent its religious missionaries to the Talokan islands. It was followed by merchants. During this time, local kings maintained a very good relationship with the Kreelanders. At one point in time, the local kings invited the Crown Prince of Kreeland to provide protection to them from Wakandan invasions and subsequently, they concluded a Treaty of Protection in 1805. The Kree presence in the Avengers Archipelago led to temporary stability in this region.

7. The situation was aggravated again following the arrival of Chitauris in the theatre of the Avengers Archipelago. In the beginning, an army troop led by an abdicated Chitauri prince took shelter in the Deadpool Island of Wakanda and subsequently occupied it in 1830. Deadpool Island is situated far from the principal Wakandan territories but closer to the Talokan maritime zone. Fearing further Chitauri expansion, the Kree-Talokan force attacked Deadpool Island and freed it from Chitauri influence by 1835. In the following years, the local rulers of Deadpool Island, despite the dissatisfaction of the majority population of Wakandan origin, showed allegiance to the Talokan authority. Deadpool Island was subsequently annexed to Talokan just

before the Wakandan independence. The Island thereafter drew the attention of the international community following the discovery of uranium in its territory.

8. The Kree-Talokan invasion of Deadpool was not well accepted by the Chitauri King. He was also concerned with the Kree influence in the Avengers Archipelago. In order to extend its influence in that region, Chitauria took a lease of a Wakandan island named the Infinity Island in exchange for protection from the Kree-Talokan force. In the next thirty years, the Chitauri force betrayed the Wakandan people and despite providing protection from foreign invasion, it ended up colonising the whole territory by 1857.

9. The occupation of Wakanda also impacted the stability of the Asgardian Continent. With the exploited wealth from Wakanda, the Chitauri King started attacking the Kingdom of Kreeland and managed to occupy a notable size of its territory. Fearing annihilation, the Kree King advocated establishing a direct relationship with Talokan's local rulers. Subsequently, the Kree Crown Prince got married into the most influential Talokan family. This event encouraged the Kreelanders to enter into marital relationships with local Talokans and this event changed the population landscape of the State of Talokan. The generation that emerged out of this mixed marriage is known as the Kreetalian people.

10. In the coming days, Talokan became a Suzerainty of Kreeland. However, during the last Battle of Marvels in 1899 Chitauri succeeded in controlling and annexing the whole Kreeland. Immediately before the defeat of the Kree army, General Namor, a Kreetalian noble, declared the independence of Talokan and maintained its separate existence. During this period, the Avengers Archipelago also experienced mass expulsion of Kreelanders from the Asgardian continent, mostly in Talokan, but also in Wakanda and Sokovia.

11. Sokovia, the smallest of the three States, managed to keep itself far from this turmoil for two reasons. First, it has the oldest surviving dynasty established by Kang the Conqueror in the eleventh century. Second, it had one of the finest naval forces in the world and was the first nation to use gunpowder in the world. Due to its obsession with racial purity, it did not occupy any other territory. However, in order to ensure its existence from Wakandan and subsequently Chitauri invasion, it concluded a Treaty of Mutual Protection and Friendship with Kreelanders in 1899. They still maintain an excellent relationship.

12. The Avengers Archipelago witnessed a few small-scale escalations in the mid-twentieth century, mostly concentrated in Deadpool Island. But the territorial map remained almost the same. In the meantime, mainland Chitauria became the hotspot of internal conflicts led by the ten Chitauri principles claiming the crown. Witnessing the horror of the human toll and the deterioration of its economy, all the contenders to the throne agreed to leave the matter at the hands of the Parliament. The Prime Minister of Chitauri Parliament called for a referendum to decide the fate of the nation. The referendum included *inter alia* an option for a Parliamentary Form of Government with a titular king as the head of the government. Ultimately, the Chitauri people opted for it and in the next two years, Chitauria adopted a modern constitution and decided to decolonize the territories under its control. Finally, Wakanda gained its independence from Chitauria in 1942.

13. In the next forty years, the Avengers Archipelago witnessed relative stability. A renewed tension broke out with the discovery of uranium at Deadpool Island in the 1960s. Wakanda questioned the Talokan annexation of Deadpool Island and claimed that the annexation was improper in international law and principles of the UN Charter. Talokan claimed that Deadpool Island was not a part of Wakanda since 1835 and Talokan exercised effective control over it since that time. In order to protect this strategically important region, Talokan had constructed a naval base.

14. The Kreelanders community forms 0.5% of the population of Wakanda. From the very beginning, they took an active part in the economic activities of Wakanda and most Wakandan Kreelanders are very affluent people. They also maintain close relationships with other Kreelanders in Talokan and Sokovia. This tendency is not appreciated by other Wakandans due to the historic rivalry. However, they used to receive special constitutional protection, thanks to the balanced Constitution that ensured an environment of peaceful co-existence in Wakanda.

15. The situation started to change after an unintentional military confrontation between a Wakandan Coast Guard vessel and a Talokan Navy vessel.

16. In the 2010s, a pirate group named the Ravagers emerged in the East Wakandan Sea. The Ravagers Island is another disputed island claimed by both Wakanda and Talokan. Though most of its population is Wakandan by ethnicity, it has been under the effective control of Talokan since 1835. The Wakandan authority was present on the island till 1999. At that time, the whole island was severely damaged by the Ragnarok Cyclone, and it lost a substantial part of its territory and its economic sustainability. The sea level rise and unprecedented floods further aggravated the situation. Many people moved to the other Talokan islands including Deadpool Island. But the others formed a pirate group. Following the Talokan's departure, the Wakandan Navy attempted to gain control over the Deadpool Island, but it was frustrated by the Ravagers pirates.

17. The Ravagers became very notorious with time, and they started attacking commercial ships indiscriminately. As the States in the Avengers Archipelago failed to establish a joint anti-piracy force, each State adopted its own procedure to deal with the Ravagers. On one fateful night in 2010, a Talokan Navy Vessel SS Loki spotted a Wakandan Coast Guard vessel near the High Sea adjacent to its Exclusive Economic Zone. Suspecting it to be a pirate ship, SS Loki asked for identification. But the captain of that coast guard vessel failed to communicate with its counterpart and started to proceed towards the Wakandan maritime zone. Seeing this, SS Loki fired at that vessel and it was destroyed. Subsequently, another Wakandan Coast Guard vessel appeared on the scene and communicated with the captain of SS Loki clarifying that it had just destroyed a Wakandan vessel.

18. This incident caused an intense diplomatic crisis between Talokan and Wakanda, and it led to a war-like situation. However, this issue was resolved through conciliation, thanks to the generous service provided by the King of Chitauria. As a result of the conciliation, Talokan provided a huge compensation to Wakanda. However, the effects of this event did not disappear within Wakanda. An intense anti-Talokan sentiment started growing within Wakanda. Some people suspected that the surviving Coast Guard vessel may have some complicity as it was led by a Kree captain.

19. During this intense situation, General Patrice Thanos, father of the deceased Captain of the destroyed Coast Guard vessel, called for a press conference on 26 March 2011. During this

conference, he questioned the role of the Wakandan government in this crisis and questioned the role of the Kree people during the crisis. He also declared that he would form a political party and contest in the upcoming general election. He promised to establish a Wakanda for Wakandans only. He also promised to recapture the lost territories of Wakanda from its neighbours.

20. The promises of General Thanos created momentum and many political leaders joined his hand. He formed the “Wakanda Forever Party” and contested in the 2012 General Election of Wakanda. In the election, the party gained 60% of the seats and General Thanos took the oath of the Prime Minister. He nominated the leader of the Shining Wakanda Party, Mr. Thomas Ronan, as the President in exchange for his commitment to support General Thanos’ plan for a constitutional amendment.

21. In the first session of the Parliament, General Thanos raised the proposal for amendment of the constitution aimed at removing the special protection of the Kree people. Though it attracted some opposition from the Parliament, it was finally passed. The Supreme Court of Wakanda also declared this constitutional amendment as valid. This process in fact initiated the de-Kreefication of Wakanda. The Wakandan policy of de-Kreefication was followed by the persecution of the Krees. Many Kree elites were harassed, and their economic activities faced invisible hurdles. Those who challenged the restrictions imposed by the Government faced harassment at the hands of Wakandan law enforcement. With the re-election of General Thanos in 2016, the pattern of persecution continued. Within a decade, the Kree population in Wakanda dropped significantly.

22. Karol Denvers is a Wakandan Kree activist. She was arrested and even tortured by Wakandan law enforcement for protesting against the Wakandan de-Kreefication policy. Her brother, Kris Denvers, was the captain of the surviving Coast Guard vessel and is in a Wakandan prison for his alleged role in the conspiracy. For this reason, her family is hated by many Wakandans. In fact, her younger brother Kevin Denvers was mob lynched in broad daylight in 2018. But the Wakandan law enforcement did nothing to investigate the murder. Karol was even arrested for protesting the inaction of law enforcement twice. However, she was released as a result Presidential clemency that take place every year on Wakandan republic day.

23. After her release, she was put under surveillance and was called to police station twice a month. Frustrated with the repeated events of harassment, she left Wakanda in a fishing trawler owned by a Kree and with the help of a fishing trawler owned by a Talokan Kree she reached Deadpool Island on 14 July 2019. On reaching the Island, she made a request for asylum in exchange for some sensitive information, a promise that was never realised.

24. Hearing the news of Karol's escape from Wakanda and her application for asylum in Talokan, the Wakandan authority filed a case of sedition against her and requested the Government of Talokan to extradite her. In order to avoid any further crisis, the Government of Talokan decided to extradite her on the condition of diplomatic assurance of a fair trial. However, Karol challenged the decision of the Talokan Government before its Supreme Court and the Court decided that her extradition would violate the principle of *non-refoulement*. Subsequently, she received asylum status on 10 December 2019 and has been living on Deadpool Island since then.

25. The Karol incident ignited a renewed tension between the two States. This time, Prime Minister Thanos of Wakanda made an ultimatum against Talokan that if it does not extradite Karol Denvers, it will invade Deadpool Island and arrest her. Talokan replied that the extradition of Karol Denvers would be a violation of international law and as a party to the 1951 Refugee Convention, it is bound to accept this situation. Enraged with the reply of Talokan authority, General Thanos declared war against Talokan and approached Deadpool Island.

26. In order to make a strategic plan, the Wakandan Force decided to occupy Ravensers Island first. It reached an understanding with the pirates that it would occupy it temporarily and would leave the Island after occupying Deadpool Island. Eventually, it established a temporary military base at Ravensers Island on 10 January 2020.

27. Fearing the immediate Wakandan attack, the Talokan authority reinforced its military in Deadpool Island and asked Prince Kang XIV for military support including naval support. Being respectful to the Treaty of 1899, it sent four navy ships under the leadership of Commander Natasha Romanoff.

28. The Talokan authority warned the Wakandan army to vacate the Ravensers Island claiming that it is the lawful sovereign of that Island. The Wakandan authority refused to leave it claiming



that it is the lawful sovereign power of that Island. In order to reclaim its territory, two Talokan Naval Ships along with one Sokovian Navy Ship named SS Kang IX attacked Ravengers Island under the covert name of Operation Ravengers Island. Eventually, they succeeded in liberating it on 14 January 2020. All the Wakandan vessels were destroyed and 100 Wakandan personnel were taken as Prisoners of War. However, unbeknownst to everyone, Wakanda deployed a nuclear-powered ship named SS T'Challa that posed massive challenge to Sokovian navy. In order to gain the military advantage, Commandar Romanoff destroyed it with the aid of SS Kang IX. The destruction of SS T'Challa brought disastrous effects on Ravengers Island and many indigenous Ravengers lost their lives, and many were exposed to nuclear radiation. Many environmental activists termed it as "*a textbook example of ecocide*". Everyone blamed Commander Romanoff for the same. Even the Government of Chitaura issued an international arrest warrant against Commander Romanoff for committing the crime of ecocide under its universal jurisdiction law.

29. Commander Romanoff was traumatised by the Ravengers incident and harshly criticised the decision of the Government of Sokovia to join the war. In Sokovia, questioning the decision of the Prince Kang XIV is considered a serious crime and Prince Kang XIV requested the Talokan authority to detain her and extradite her to Sokovia after the conclusion of the war. In the meantime, the Sokovian police arrested the whole family of Commander Romanoff. The statistics say that all the persons convicted of crimes against the Prince Kang XIV faced the death penalty. Commander Romanoff applied for asylum. However, the Talokan Government suspended the refugee determination procedure in Deadpool Island till the general close of ongoing conflict.

30. Two days after the Ravengers Island Operation, the Wakandan Navy and Airforce commenced a joint operation on Deadpool Island. It was apparent that the occupation of Ravengers Island was a set-up to weaken the Talokan military strategy. The fight lasted two months and the Wakandan Force established its full control over Deadpool Island on 17 March 2020.

31. During the war, Wakanda also suffered heavy casualties and many Wakandans died while fighting. This incident caused friction within Ronan's Party. But General Thanos, whose

ancestors came from Deadpool Island, dreamed of annexing Deadpool Island to Wakanda. However, the process of annexation requires a constitutional amendment. Coincidentally, the date of the 2020 General Election was scheduled on 17 July 2020. During the campaign of the General Election of Wakanda of 2020, General Thanos made a promise that if his party managed to win the election with a supermajority, he would annex Deadpool Island. Eventually, his Wakanda Forever Party gained 80% of the total seats. After the election, Wakanda first set up a puppet government in Deadpool Island who declared its independence from Talokan calling it as “its inherent right of self-determination”. The puppet government subsequently declared to join Wakanda. Eventually, Wakanda annexed Deadpool Island as its thirteenth Federal Unit on 17 August 2020. Local inhabitants of Wakandan origin welcomed this decision. However, the UN General Assembly passed a resolution (90 in favour, 80 against, and 23 abstentions) condemning the Wakandan annexation of Deadpool Island.

32. One of the first acts of Wakandan authority in Deadpool Island following its occupation was to attempt to arrest and detain Karol Denvers. Predictably, she took a guise immediately and hid in the Deadpool Forest. Eventually, the Wakandan occupation force arrested Karol on 20 July 2022. It issued a notice stating that she would be transferred to Infinity City to face the charge of sedition instituted in 2019. The notice further mentioned that her request for asylum was improperly evaluated, principally due to non-consideration of Article 1F(b) of the 1951 Refugee Convention.

33. Karol Denvers first challenged the decision of the Wakandan authority before the Court of Deadpool Island on 1 August 2022. The Deadpool Island Court rejected her application *in limine litis* on 11 October 2022.

34. Being disappointed with the outcome of the Court of Deadpool Island, she moved to file a case before the Wakandan Supreme Court on 11 November 2022. The hearing took place from 10 March to 20 March 2023 and the Court issued its judgement against her on 11 August 2023. She filed a petition for review against the decision on 1 September 2023 and it was rejected on 1 October 2023.

35. Before the Wakandan Supreme Court, Karol Denvers raised three points. First, the annexation of Deadpool Island is in violation of the UN Charter, the Four Geneva Conventions,

and Additional Protocol I, and it should be considered “occupation” in public international law. Second, the refugee should be treated as per IV Geneva Convention 1949, Additional Protocol I of 1977, and customary international humanitarian law and she must not be removed from Deadpool Islands. Third, her asylum application was not properly evaluated, and the exclusion clause of the Refugee Convention does not apply in her case.

36. The Wakandan Supreme Court declared that the annexation of Deadpool Island is lawful in international law and no one can be a refugee in her own country. Thus, it rejected her application. The review application was rejected on the same grounds.

37. On the final day of the total occupation of Deadpool Island by Wakanda, the responsible persons of the Talokan military detention facility liberated all the detainees including Commander Natasha Romanoff. Commander Romanoff knew that Wakanda was a close ally of Chitauria and she would be extradited to Chitauria in the event of her eventual apprehension in the hands of Wakandan. On the other hand, she knew that she would be extradited to Sokovia if apprehended by Talokan. In her considerate understanding, only refugee status could save her life. It was even better to abscond from both parties. Subsequently, she, like Karol Denvers, hid in the Deadpool Forest until her arrest at the hands of Wakanda on 1 January 2023.

38. Immediately after her arrest, she made an application for asylum to the Wakandan authority in Deadpool Island. On 2 March 2023, the Wakandan authority rejected her application on the ground that she falls within the exception clause of the 1951 Refugee Convention as she committed ecocide that attracts Article 1F(b) of the Convention. The spokesperson of Deadpool Island Government told the press that Commander Romanoff also committed war crimes by destroying SS T’Challa. He further stated that they have definite information that as a former Director of Sokovian Naval Intelligence, she had definite knowledge of the nuclear-powered engine of SS T’Challa and her objective was to destroy the Ravagers Island, not the SS T.Chall. The next day, General Thanos made a public statement that “The Commander is our national liability now. She does not deserve asylum status. We will first send her to face trial in Chitauria, then try her in Deadpool and finally send her to Sokovia to face the final trial.” The Wakandan Government issued a notice on 10 March 2023 extraditing Commander Romanoff to Chitauria.

39. Commander Romanoff challenged the asylum application outcome and the Government's notice before the Wakandan Supreme Court on 5 April 2023. The hearing took place from 15 April to 20 April 2023 and the Court issued its judgement against her on 12 August 2023. She filed a petition for review against the decision on 5 September 2023 and it was rejected on 10 October 2023.

40. Before the Wakandan Supreme Court, Commander Romanoff raised three issues. First, she challenged the outcome of her asylum application and marked it as improper as ecocide is yet to be recognized as an extraditable crime in Wakanda. Second, she further remarked that the destruction of SS T'Challa was a lawful conduct of hostility under international humanitarian. In her opinion, the Wakandan nuclear project was just a myth. Thirdly, Sokovian charge does not fall within the parameters of Article 1F(b) and alternatively, her extradition would violate the principle of *non-refoulement*.

41. The Court rejected her application on the ground that as there are strong allegations of war crimes against her and as it falls within the forum State, Wakandan authority should deal with it first. As the allegations are yet to be established beyond a reasonable doubt, it renders the rest of the points as "moot". Thus, the Court refused to deal with the other two issues. The review decision added a new ground that "as the decision of extradition falls within the executive domain of the Government, a Court should not foretell anything unless there is already one".

42. The Wakandan judiciary faced another novel case. This case appeared from the Ravensers Island incident. Following the destruction of SS T'Challa, the climate of the Ravensers Island completely changed. In particular, the water became very contaminated. Most of the inhabitants fled to other Talokan islands. Deadpool Island was the closest Talokan Island, and many Ravensers took shelter in it before its occupation and annexation. Due to the security concern over Deadpool Island, the Wakandan authority was very cautious about the admission of new persons into its territory. Many Ravensers who attempted to enter Deadpool Island were either deported to Ravensers Island or refused entry and allowed to drown in the sea.

43. Peter Quill is one of the last inhabitants of Ravensers Island. After the destruction of SS T'Challa, the Peter's life became miserable. Most of his neighbours either joined the Pirates or moved to other Talokan islands. Many Ravensers also moved to Wolverine Island as migrating to

Deadpool Island became challenging after its annexation. The Quill family tried to be resilient. The destruction of SS T'Challa exposed Peter's son to nuclear radiation and he eventually died. The water became contaminated. The whole island became dependent on the pirates for life-supporting goods. Moreover, the pirates started exploiting the local people. Eventually, the rest of his family members moved to Deadpool Island with the help of pirates. Peter Quill had no other options but to leave the Ravagers Island.

44. Peter Quill planned to leave Ravagers Island for Wolverine Island on 25 December 2022. He started his journey in a makeshift vessel with 10 other Ravagers. Unfortunately, the vessel drowned and all the passengers except Peter lost their lives. However, SS Green Wakanda carrying the activists of the Guardian of the Green Galaxy or 3G saw him and gave him shelter. 3G is a group of environmental activists who are advocating against mining in the EEZ of Wakanda. In the past, they have been reported to have interfered with the mining activities of many oil platforms. They have at least three ships – all registered in The Neverlands. The Government of Wakanda often refers to them as eco-pirates.

45. When the SS Green Wakanda reached the Wakandan EEZ from the coast of Wolverine Island, a Wakandan Coast Guard vessel noticed it and commenced a hot pursuit. Finally, the Wakandan Coast Guard arrested the SS Green Wakanda and sent all persons to Wolverine Island for their prosecution under anti-piracy legislation. Notably, all the passengers of SS Green Wakanda except Peter Quill were released immediately following the Neverlands' intervention.

46. Immediately after reaching Wolverine Island, he filed an application for asylum on the grounds of climate change. The Wolverine Island authority rejected the application on 24 February 2023. The rejection letter stated that climate change is not a recognized ground for refugee status admission and even if it is considered a valid ground for admission, he will be excluded due to his participation in the acts of piracy.

47. Peter Quill challenged the asylum application outcome before the Court of Wolverine Island on 1 March 2023. The Court of Wolverine Island rejected his application *in limine litis* on 12 March 2023.

48. Peter Quill challenged the decision of the Wolverine Island Court before the Wakandan Supreme Court on 1 April 2023. The hearing took place from 12 April to 21 April 2023 and the Court issued its judgement against him on 31 July 2023. He filed a petition for review against the decision on 25 August 2023 and it was rejected on 31 September 2023.

49. Before the Wakandan Supreme Court, Peter Quill raised three issues. First, he claimed that climate change is considered a recognized refugee status admission ground in international law. Second, the alleged charge of eco-piracy cannot be a valid ground for the refugee status exclusion ground mentioned in Article 1F(c) and alternatively, he was not a part of 3G campaigners. Third and alternatively he should at least be provided the protection of non-refoulement as his return to Ravagers Island would risk his life.

50. The Wakandan Supreme Court rejected the application on the ground that Wakandan refugee admission legislation does not recognize “climate change” as an admission ground and eco-piracy is not a recognized form of piracy in Wakanda. The review decision further added that the principle of *non-refoulement* does not extend to high seas and even registered ships of a State.

51. Being dissatisfied with and aggrieved by the decisions of the Wakandan Supreme Court, all three defendants moved to file individual complaints before the Greater Avengers Court of Justice and Human Rights (GACJ). The GACJ is a sub-regional court having jurisdiction established by the Avengers’ Convention on International Justice and Human Rights 2010 (ACIJ) and all three States (Wakanda, Sokovia, and Talokan) have ratified it. The ACIJ entered into force in 2012 and the GACJ was established in 2015.

52. Article 1 of the ACIJ states that “[t]he High Contracting Parties shall secure to everyone within their jurisdiction the rights and freedoms defined in Section I of this Convention.”

53. Article 2 of the ACIJ states that “[t]he jurisdiction of the Court shall extend to all matters concerning the interpretation and application of this Convention and all the matters concerning the application of the instruments referred to in Annex A.”

54. Annex I includes among others International Covenant on Civil and Political Rights and Convention relating to the Status of Refugees.

55. Article 3 of the ACIJ states that “[t]he Court may resort to Articles 31 to 33 of the ICJ Statute for the purpose of interpretation.”

54. Article 4 of the ACIJ states that “[t]he Court may receive applications from any person, non-governmental organisation or group of individuals claiming to be the victim of a violation by one of the High Contracting Parties of the rights set forth in the Convention or the Instruments referred to in Annex A.”

55. Each person filed their cases separately. However, the Court decided to make a joinder of the three cases due to the similarity of subject matters and claims and the applicants did not raise any objections. The Court instructed Karol Denvers, Natasha Romanoff, and Peter Quill to file a fresh application with their issues.

56. Now, they have lodged a fresh joint application against Wakanda and raised the following issues:

1. Whether Karol Denvers may be stripped of the refugee status assessed by Wakandan authority and whether she may be lawfully removed from Deadpool Island in international law.
2. Whether the refugee application of Commander Natasha Romanoff be excluded and whether she should at least enjoy the protection of *non-refoulement*.
3. Whether Peter Quill’s deprivation of refugee status is lawful in international law and whether he should at least enjoy the protection of *non-refoulement*.