



Hair By Salah <hairbysalah@gmail.com>

serious concern

3 messages

Hair By Salah <hairbysalah@gmail.com>

Sat, Jun 28, 2025 at 5:30 PM

To: Karina <karina@lutfilaw.ae>

Dear Karina, I'm writing this email to let you know my deep concern about the delay in producing of the necessary memorandum of defence related to my DIFC Court case.

The following was a court order about three months ago to me as the defendant to prepare and submit on the court portal by the mention date.

4pm (GST) on 21 April 2025,

Please see the attached file sent by the court as an official court order for myself or my legal representative to do the necessary on time however this case is more than a one million USD claim against myself and it is no joke! we obviously haven't done any communication that could be considered as work effort.

Even my last email was totally ignored and there was no response from your side.

I just would love to let you know that we have a contract and yet I pay 30% of the quotation you provided me upfront and I held on to the next payments because I haven't seen any work done.

The next hearing session is by 17th of July which is about two weeks later and what have you prepared for that is not far from zero!

Honestly, I have no faith in you anymore. I have no confidence in your work anymore and I am considering my money to be refunded.

I would appreciate it if you have told me that you have no time for my case from day one during the consultation or if you have not taken my case at all I am left in a very crucial situation where as I have no time to hire another lawyer and prepare the necessary documents.

Anyway I don't like to use this language but seriously by Monday morning if I have no positive response from your side I might take a legal action against your company as per the law and the rights given to me and using the contract that your Office and I have signed.

As you see, the date set by the court for uploading the defence documents and any other related documents that help me defend myself in this case is past!

However, I have no idea now if I can ever submit any more documents to the court or if the court will accept it at all since the days are missed because of your slow workflow.

Monday Morning if no response then I will be taking my legal action against your office as the law of UAE and I'm sorry this is not personal.

thank you so much

Salah Masri

**CFI-066-2024- Case Management Order of H.E. Justice Thomas Bathurst dated 18 April 2025.pdf**
163K**Karina** <karina@lutfilaw.ae>

Mon, Jun 30, 2025 at 8:55 AM

To: Hair By Salah <hairbysalah@gmail.com>

Dear Mr. Salah,

We understand your concerns and have forwarded the matter to our senior consultants. Please allow us until midday today to respond.

Regards,
Karina Manaf
Legal Assistant
Lutfi & Co.
Advocates and Legal Consultants
1201 & 1205
API Trio Tower
Al Barsha 1
Dubai, UAE
Tel -009714 4222555
karina@lutfilaw.ae

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From: Hair By Salah <hairbysalah@gmail.com>
Sent: Saturday, June 28, 2025 5:30 PM
To: Karina <karina@lutfilaw.ae>
Subject: serious concern

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Karina <karina@lutfilaw.ae>
To: Hair By Salah <hairbysalah@gmail.com>
Cc: Harjeet <harjeet@lutfilaw.ae>

Mon, Jun 30, 2025 at 12:05 PM

Dear Mr. Salah,

We refer to your recent correspondence and wish to provide you with a clear update on the current status of your case and the next steps going forward.

Following the Case Management Conference held on **March 3, 2025**, the DIFC Court directed you, as the Defendant, to submit certain supporting documents, including those requested by the Claimant (such as your bank statements). We confirm that you complied with this direction and submitted the requested documents on **March 27, 2025**.

Subsequently, the Case Management Order was issued on **April 18, 2025**, directing the Defendants to submit the standard production of documents by **April 21, 2025**. Kindly note that the required documents had already been submitted by you on **March 27, 2025**, prior to the deadline. After reviewing the court portal, we confirm that all the necessary documents requested by the Court have been duly submitted by you, including the following:

- (a) The RAK Bank statements for Account No. 0243169101001 as identified in ADIB Account No. 19038723 held by the Second Claimant, for the period from 1 January 2023 to 28 May 2024, along with the two loan agreements referenced therein. These statements reflect disbursements and debits, including an amount of AED 1,012,000 disbursed and AED 389,244.75 debited.
- (b) All documents related to the transfers made through the Second Claimant's bank accounts to **Liberty House** during the period 1 January 2023 to 28 May 2024.
- (c) All documents and contracts related to transfers made through the Second Claimant's bank accounts to the entity identified as **DIFC Investments**, including proof of payment documentation associated with the establishment of the Second Defendant.
- (d) All documents and contracts related to fund transfers to the **Third Defendant**, including evidence of an agreement to zero the bank balance before the transfer of ownership. This covers the period between the loan obtained from RAK Bank under Agreement No. 20669222 and 28 May 2024.
- (e) Supporting documents and contracts for payments made from **Haircrafter Company's** bank account, specifically in relation to Transaction Reference No. 20649173, reflecting a payment totaling

AED 389,244.75 identified as a loan repayment.

(f) All documents and contracts related to the transfer of company funds from the Second Claimant's RAK Bank account to the DIFC entity "**HairbyRojin**".

In relation to the upcoming **Case Management Conference scheduled for July 17, 2025**, we are pleased to inform you that the DIFC Courts have now accepted our **Power of Attorney** to represent you in this matter. Accordingly, we are now in a position to take all further procedural steps on your behalf.

Next Steps:

Step 1: Confirm Registry Acceptance of Form P37/01 (Completed)

- Await confirmation from the DIFC Registry that our Notice of Change of Legal Representative (Form P37/01) has been accepted and that the case is accessible via our portal.

Step 2: Reach Out to Claimant for Consent (Completed)

- Send a formal email to the Claimant's legal representative informing the change of legal representative and requesting their consent to file the Statement of Defense out of time.
- If they agree, request that they co-sign a **Consent Order** allowing us to submit the Defense by a mutually agreed date.

Step 3: File the Consent Order with the Court (Awaiting response from the other party's lawyer)

- Once signed by both parties, file the **Consent Order** through the e-Registry portal for approval.
- Upon court approval, proceed to file the Statement of Defense.

Step 4: Alternative – Application Notice (if no consent)

- If the Claimant does not agree or does not respond, prepare and file an **Application Notice (Form P23/01)** requesting the Court's leave to submit the Defense.
- This will need to be supported by a **Witness Statement** explaining:
 - **Change in Representation**
Explain that the Defendants were initially self-represented and have only recently appointed our firm as legal representatives through a duly executed POA.
 - **Reason for the Delay**
State that the Defense was not filed within the original timeline due to the Defendants' lack of legal representation and the procedural delay in transitioning legal counsel.
 - **No Prejudice to the Claimant**
Emphasize that the delay has not caused any material prejudice to the Claimant, and that allowing the Defense to be filed ensures a fair opportunity for the Defendants to present their case on merits.

Step 5: File the Statement of Defense

- Once permission is granted (via Consent Order or court ruling), file the Statement of Defense through the portal and serve it on the Claimant.

We aim to complete the entire process and submit the final Statement of Defense before the next hearing date of **July 17, 2025**.

We fully understand your concerns and the importance of this case. Please rest assured that we are aligned in our objective to defend your position with diligence and to achieve the best possible outcome. Your cooperation in providing us with timely information and documents thus far is appreciated, and we remain committed to working closely with you as the matter progresses.

Should you have any questions or further information to share, please do not hesitate to reach out.

Regards,
Karina Manaf
Legal Assistant
Lutfi & Co.
Advocates and Legal Consultants
1201 & 1205
API Trio Tower
Al Barsha 1
Dubai, UAE
Tel -009714 4222555
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