

THE DUBAI INTERNATIONAL FINANCIAL CENTER COURTS

IN THE COURT OF FIRST INSTANCE

CLAIM CFI-066-2024

BETWEEN:

1 - KLESTA ESHJA

(the "First Claimant")

2 - HAIR CREATORS SALON LLC

(the "Second Claimant")

Claimants

AND

1 - SALAH MASRI a.k.a SALAH MOHAMED ADEL AL MASRI

(the "First Defendant")

2 - HAIR CRAFTERS COMPANY LTD

(TRADING NAME THE GROVE SALONS) a.k.a HAIR BY SALAH

(the "Second Defendant")

3 - LULLIA VALLIULINA

(the "Third Defendant")

4 - HAIR BY ROJIN LTD

(the "Fourth Defendant")

Defendants

THE DEFENDANT' RESPONSE TO THE CLAIMANT FILED REPLY

ON APPLICATION CFI-066-2024/8

The First Defendant - Litigant in Person

Filed on 29 / September / 2025

About

Pursuant to the Court permission to respond to the Claimant's recent submission on Friday, 26 September 2025, herein, the First, Second and Third Defendants collectively "Defendants" respectfully submit this formal response to the Claimant's reply.

1. Brief summary of the Claimants' response

"The Claimants' formal response argues that the First Defendant's application no. 8 inadvertently admits to withholding evidence and demonstrates a pattern of non-compliance with court orders. The Claimants again requested the Court to strike out the Defendant's Urgent Declaration filed, and that the court to deny any request by the Defendants to reduce the costs amount." as seen thereon.

1.1 The Defendants asserts that this methodical approach of questioning every detail of material evidences produced, while accusing the opposing party of persistent withholding material information and engaging in ceaseless arguments to challenge even the Struck out filings and Part 1.8 of RDC in the proceedings, has now become evident as a systematic practice to attain objectives that are best known by the Claimants.

1.2 The Defendants wish to draw the court's attention to the fact that no credible evidence has been presented to substantiate any of the claims made against them. It is particularly noteworthy that after the Case Management Conference held on the 3rd of March, the Defendants submitted their supporting documents, albeit in a standard and simplified manner. Nevertheless, these documents served as evidence countering the allegations and disproving many of the claims, such as the First Defendant allegedly did not pay salaries before share transfer, then proved wrong as per payment proof submitted that salaries are paid. { [evidence in annexure E7](#) }

1.3 Since that time, the Claimants disapproving and doubting the authenticity of each supporting document that was requested for disclosure and presented to the Court. shall the proceedings continues in this manner, it will not be beneficial to anyone.

1.4 A suggestion put forth by the defendants, which would effectively dispel any uncertainty regarding the material evidence and accompanying documents, is that all emails pertaining to the case should be sent directly from the defendant's email account to the claimant's counsel email address, keeping the eRegistry in a copy. Furthermore, all electronic communications can be authenticated, and both parties may convene in the presence of the court to allow for the direct examination of electronic material evidence from the personal phone of the first defendant. Should a Court order direct to.

2. Response to the alleged issues raised from the Urgent Declaration filed

2.1 The allegations cast upon the authenticity of the Affidavit signed by the First Defendant on 11 August 2025 are unfounded. The contents of the Affidavit are indeed accurate, and the documents referenced for disclosure therein have been provided and are verifiable. There exists no basis for doubt, as the date of Ms. Danica's witness statement follows that of the Affidavit. All witness statements, the Affidavit itself, and the accompanied supporting documents are devoid of any misleading information, the only document in question was the "Amended Defense" thereby placing the claimant to strict proof.

2.2 The First Defendant assures that the reason why the Affidavit being attested by a different part II registered lawyer stems from Lutfi & Co.'s inability to obtain an appointment at the DIFC Court before the submission deadline.

{ [evidence in annexure E6](#) }

2.3 The First Defendant conveyed in his Witness Statement, filed with Application no 8, to this esteemed Court and in reference to the struck out filing is that further Supporting Documents were prepared, but not been submitted as a result of the unsatisfactory conduct by the former Legal Counsel, therefore the Claimant's continued blaming is not ethical.

2.4 The Defendants would like to remind, albeit belatedly, that the Claimants failed to provide clear instructions about a precise disclosure method in which they expect the Material evidence to be produced as per the Court order dated 4 Sep 2025 par (8.), nor did they offer any straightforward guidelines that could assist in saving time. It is important to highlight that the Defendants have nothing to conceal. Instead, the Claimants opted to argue over every single detail, portraying the Defendants as uncooperative parties.

2.5 The primary objective of Application no. 8 was to promptly assert the Defendants' lack of responsibility concerning the content generated by artificial intelligence specifically the amended defences presented by Lutfi & Co., the former Legal Counsel of the Defendants but not the entire pleading as alleged, The application is titled 'Urgent Application to Clarify Counsel Submission.' Self-explanatory.

"His request to submit a revised defence constitutes an attempt to relitigate issues, seeking another bite at the cherry and undermining the process of fair justice for the Claimants, If permitted any further submissions by the Defendants should not delay the proceedings,"
as seen thereon.

2.6 with utmost respect, this matter pertains to a Court ruling, and it is the esteemed judge who possesses the authority to make a determination.

2.7 The content of Application no. 8 "Urgent Declaration" differs significantly from that of Application no. 10, which presents a clear objection to the unreasonable statement of cost, and the ruling associated with it fall under the Court's jurisdiction, While application no. 9, submitted by Lutfi & Co., is solely their concern and made at their own discretion for reasons they deem necessary.

2.8 The Defendants have re-filed all pertinent details, encompassing every conceivable piece of material evidence, including audio transcripts, exported chats, digital attachments from electronic conversations, and additional items, in response to the Claimant's spurious doubts about the documents and evidence disclosed on 11 August 2025. This resubmission followed the court's order granting liberty to re-plead, and all materials were filed on 19 September, comprising the same material evidence but with enhanced details and improved disclosure methods, of which the Claimant received a complete copy yet chose not to acknowledge.

2.9 The defendant wishes to note that the Amended Defences drafted and submitted by Lutfi & Co., the former Legal Counsel, did not meet the ethical standard mandated by the Court before the entire pleading been Stuck out so arguing about any details related to these erased filings is a non-sense and a true wast of time, now that with all due respect the conduct of the Claimant Legal Counsel addressed above is becoming concerning to.

3. with full respect, All the prolonged arguments in the Claimant' formal response from para (3.1) to para (3.20.3) are addressed in the filed draft of Defence and its Supporting Documents, Witness Statements and the ordered Affidavits, on 19 Sep 2025 and as well in the filed formal Objection application on 23 Sep 2025, all of which are subject to the honourable Court wise judgment thus the First Defendant wishes to save the valuable Court time by relying on his faith in its justice.

4. Relief Thoughts of the Defendants within this matter.

4.1 The DIFC Court be pleased to

- Dismiss the application no 8' Strike out request.
- Refer the assessment of wasted cost to the Court Rules as per the formal requests made in the Objection Application no. 10.