

Claim No: CFI-066-2024

On behalf of the
First, Second and Third Defendants

Dated 1, Sep, 2025

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON LTD

Claimants

AND

(1) SALAH MASRI a.k.a SALAH MOHAMED ADEL AL MASRI

(2) HAIR CRAFTERS COMPANY LTD (TRADING NAME THE GROVE
SALONS) a.k.a HAIR BY SALAH

(3) LULLIA VALLIULINA

(4) HAIR BY ROJIN LTD

Defendants

FIRST DEFENDANT [SALAH MASRI]'S URGENT APPLICATION TO
CLARIFY COUNSEL'S SUBMISSIONS

Your Honor, I respectfully present this urgent petition to elucidate significant issues concerning the recent multiple submissions of defense and counterclaim by the legal counsel I have appointed to represent me in this honorable court proceeding.

Starting off with an acknowledgment of that the drafted defense and counterclaim submitted by my legal representative are deficient in clarity, perplexing, and fail to satisfy the ethical standards mandated by the court.

1 - Specific denial of authorization for AI-generated content

By all means, the following is hereby denied:

A - I have never authorized the appointed legal counsel (Lutfie & Co) or or any member of their firm represented me (the first defendant) and (the third defendant) in this esteemed court to utilize content generated by "artificial intelligence" in any document throughout the proceedings, nor to present any misleading information or false facts at any time. {Evidenced in E-1}

B - I have not reviewed nor signed any of the memorandums of defence submitted by my legal representative at any time, except for the ordered Affidavit was duly sign by myself without a chose. {Evidenced in E-2}

C - after many requests to my legal representative to share the drafts with me for refining prior to submission, I happened to find the same already submitted on the e-registry Portal in a surprising fashion.

2. - Affirmation of underlying evidence

While I confirm that all of contents in the supporting documents, exhibits, and evidence submitted on my behalf are indeed true and accessible via my email account, personal phone's "WhatsApp," and other electronic data storage drives but only been submitted in a confusing method and gradual disclosure.

2.1 - **Noting that** certain attachments, including audio transcripts, were not submitted and it is important to mention that these were provided to my legal representative but were never submitted as these deemed to be unnecessary as per my legal representative.

2.2 - In regards to the respected claimant's remarks regarding the submitted supporting documents, evidence, contracts, and statements, I wish to clarify the following:

A - Requested Loan Agreements;

I have disclosed all agreements currently in my possession, extracted from emails I received from RakBank and any further official Loan contracts requested by the claimant's representative can only be obtained through a direct court order addressing RakBank.

B - Conversations with Mr. Aldo, Mr. Sokol, and Ms. Marsela of Platinum Real Estate;

I have submitted the conversations with best module possible within my limited skills, the further requested audio voice notes exchanged during these discussions can be transcribed and submitted along with the complete attachments, should permission be granted.

C - Transactions to DIFC Investments;

The requested invoices related to these transactions are accessible in the DIFC Client Portal of the second claimant, to which only the first claimant currently has access, while my archived data contains a limited number of these.

D - Proof of payment concerning the establishment of the second defendant is presently in my possession and can be submitted if allowed, noting that it was shared with my lawyer but not formally submitted.

E - Witness statement from the salon receptionist;

Ms. Danica confirms that the company liabilities were disclosed to Mr. Aldo through printed copies of the salon's bank statements that she handed the same by herself.

3 - With the utmost respect, I never attempted to challenge the court or disrupt this preceding in any manner that could be construed as such; my intentions were never to withhold any requested material nor to cause any delay or waste any time, **herein**, I express my disappointment with the legal counsel who has managed my defense up to this point, and I kindly request your valuable permission to change my law firm and to resubmit a defense that can provide clarity and fulfill my position in this dispute.

4 - I am full of faith that I have done no wrong to anybody and still till the date paying the monthly installments of the second claimant's Loan with total paid post the sale of shares amounting over 500,000 Dirhams and **I hope that means something** to this Honorable court, I possess all necessary evidence to substantiate my stance.

5 - **Therefore**, I respectfully seek permission to change my legal representative and request a maximum of one week on my cost to

resubmit an improved version of my defense, which will not significantly alter the content but will provide clarification and enhance transparency including my signature on it as one and final chance to assist the court in better understanding my position.

5.1 - **Moreover**, in light of your wise advice during the CMC back in March to secure legal representation for this matter, I promptly appointed Lutfie & Co., made the necessary payments, signed the contract, and awaited their response, I have also emailed them to emphasize the urgency of commencing the drafting of the defense memorandum before it becomes too late. {Evidenced in E-3}

5.2 - Despite this yet still subsequent delays occurred, I resent multiple reminders for them to review the Claim Form and prepare the requisite supporting documents and evidence. but they remained inactive. Consequently, on June 28 2025, I issued a **notice** of contract termination due to their failure to prepare any of the necessary documents for disclosure. only on 30 June prior to the CMC in July they submitted a notice of a legal change on the E-Registry followed by application seeking leave to amend the defense, which could have been prepared months earlier.
{Evidenced in E-4} Very Important

5.3 - Your Honor, I find myself a victim of selecting an unsuitable law firm, and I am considering submitting a claim against them within a few days to recover the damages they have inflicted upon my position in this proceeding by submitting numerous poorly drafted documents, with unclear evidence, and provided fewer documents than what was requested by the claimant as well as prolonging the procedure for unexplained reasons.

6 - MOTION FOR REDUCTION OF JUDGMENT

INTRODUCTION

I, the first defendant, with utmost respect for this Court, files this memorandum to humbly request a reduction of the judgment amount. This request is made not to challenge the court's decision but to present a significant financial hardship that makes the current judgment unduly burdensome.

6.1 - STATEMENT OF FACTS

A - On 7 Aug 2025, this respected court issued a judgment against the three Defendants to pay a compensation for the waste of time of the claimant without specifying the sum.

B - Defendants accepted the Court's decision and takes full responsibility for the harm caused to the Plaintiff only and specifically the delay in time into the proceeding.

C - The purpose of this motion is to elucidate the Defendant's current financial circumstances, which were not fully presented during the prior proceedings.

7 - ARGUMENT

Defendant Faces Extreme Financial Hardship.

The current judgment did not specify an exact amount to be paid but the respected claimants later on demanded 300,000 Dirhams which seems to be a bit unrealistic amount imposes a severe financial burden that the Defendants cannot meet without experiencing extreme hardship.

Therefore I can request this on court to take that into consideration

CONCLUSION

For the reasons stated above, Defendant respectfully prays that this Honorable Court to

1 . Permit the law firm change and one more submission of clear Defense and counterclaim within one week.

2 . grant this Motion and enter an order reducing the monetary judgment to a sum that is fair and commensurate with Defendant's ability to pay.

Humbly requested and Respectfully submitted,

Salah M.Adel Masri (First Defendant)

