

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 CREATORS LTD - LADIES ONLY HAIR BY ROJIN
(the "Fourth Defendant")

Defendants

WITNESS STATEMENT

Second Defendant - 19 September 2025

Hair Crafters Company Ltd

I, Luliia Valiullina, a Russian national, holding Passport number 51N7320624, having my address at 2419, Liberty House Tower, DIFC, Dubai, UAE, make this statement in my capacity as the sole shareholder and authorized representative of the Second Defendant, The Hair Crafters Company LTD (trading as The Grove Salons). I do solemnly affirm as follows:

1. I make this witness statement by the liberty to re-plead granted under the Order of H.E. Justice Thomas Bathurst dated 4 September 2025 (the "Order"), as a Third Defendant to support the Second Defendant's application of this Draft of Defense in this case.
2. I has given careful consideration to the Order which struck out my previously filed Defence by my legal Counsel.
3. Following the appointment of Lutfi & Co. Advocates, the Second Defendant's previous legal representatives, I came to know that the defenses submitted on it behalf were not appropriate and continued some AI generated content, thus here I resubmit my true hand written fact checked defence.
4. I confirm that the Second Defendant was not a party to the Share Purchase Agreement dated 20 March 2024, nor to the Memorandum of Understanding dated 14 February 2024, both of which were executed solely between the First Claimant and the First Defendant.
5. The Second Defendant's only relationship with Mr. Masri has at all times been that of an employee, engaged in the capacity of hairstylist and technical trainer. Mr. Masri has no ownership authority, or any power to bind the Company in contractual matters.

6. The proposed Draft of Defense seeks to properly articulate these matters, clarify the Second Defendant's limited involvement in the facts submitted in the Particulars of Claim by the Claimants, and ensure that the Company's legal and procedural position.

7. Accepting the Defendant's Draft of Amended Defense at this stage promotes procedural fairness and efficiency. In particular, This Draft of Defense if accepted by this Honourable Court would clarify matters and helps for better understanding.

8. I understand that if permission to accept is not granted, the previous Statement of Defense may be disregarded at trial. This would place the Second Defendant at a serious procedural disadvantage and compromise its right to a fair adjudication on the merits.

10. The present application is made in good faith to ensure that the Second Defendant's position is clearly recorded, legally substantiated, and determined on the merits, in accordance with the principles of fairness and due process.

The Second Defendant remains committed to cooperating fully with the Court and the other parties, and to complying with all procedural directions issued in the course of these proceedings.

Statement of Truth

I believe that the facts stated in this witness statement are true.

Iulia Valiullina on behalf of the Second Defendant

Signature:

A handwritten signature in blue ink, consisting of a stylized 'B' followed by a horizontal line.