

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

The Third Defendant - 19 September 2025

LULIA VALIULLINA

I, Luliia Valiullina, a Russian national, holding Passport number 51N7320624, having my address at 2419, Liberty House Tower, DIFC, Dubai, UAE, do solemnly affirm as follows:

1. I am the Third Defendant in this case and I made this statement seeking the Court's kind permission to accept my Draft of Defense and to be filed on my behalf by the First Defendant.
2. On Jul 2024, and on Aug 2024, an Amended Statement of Defense were submitted on my behalf by Lutfi & Co. Advocates, At that time, I had trust in them to represent me and to file documents for and on my behalf in good faith.
3. Unfortunately, I have been dissatisfied by their performance that the statements of defense filed on my behalf did not meet the requirements of of the Rules of the DIFC Courts, and that filing did not properly or adequately reflect my position in this dispute.
4. I confirm to this Honorable Court, that I was not a party to the Share Purchase Agreement or the Memorandum of Understanding signed between the First Claimant and the First Defendant, nor was I involved in the negotiations or execution of these documents.
5. Particularly, at the time these contracts were executed, I was merely employed by the Second Claimant, Hair Creators Salon Ltd. By then I had no shareholding, management authority, or decision-making involvement in the matters addressed in the Claimants' pleadings.
6. I have now prepared my defence by myself addressing the true facts only and I humbly prepared a Draft Statement of Defense, to be accepted and filed on the Court.

7. my defense was focused on responding to the following summary of Claims against me in CFI-066-2024

A. Conspiracy and Involvement of the Third Defendant

The Third Defendant is accused of actively participating in the scheme. This includes:

- **Assisting in collecting customer data** during the notice period to use for the new venture.
- Being a **shareholder and co-owner** of the competing Second Defendant.
- **Benefiting from suspicious payments** from the Second Claimant's accounts.
- Previously being a **hidden shareholder** of the Second Claimant, with shares frequently transferred between her and the First Defendant.

B. Concealed Relationship and History Between Defendants

The First Defendant deliberately concealed his personal and financial relationship with the Third Defendant (his wife) and their history of intermittently transferring ownership of the company between themselves, preventing the First Claimant from understanding the true operational risks.

8. Through this Draft of Defense, I seek to:

- (a). Clarify my position and lack of involvement in the transaction;
- (b). Refute the allegations made against me by providing the Honorable Court accurate context;
- (c). Correct the deficiencies in the previous defense;

(d). Preserve my legal right to be heard fairly on the basis of accurate pleadings.

9. Allowing the Defendants to re-plead at this stage promotes procedural fairness and efficiency.

10. I confirm that this application is made in good faith to ensure that my position is accurately presented and determined on its merits in accordance with the principles of fairness.

11. I remain committed to cooperating fully with the Court and all 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.

Signature:

Name: Luliia Valiullina

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