

April 24, 2026

LEGAL NOTICE

PRIVATE & CONFIDENTIAL

WITHOUT PREJUDICE

Via Registered Post & Email

To,

Salah Masri

Dubai,

United Arab Emirates

(hereinafter referred to as "Salah or You")

Subject: Reply Legal Notice

Dear Sirs,

We write on behalf of **Lutfi & Co.** (hereinafter referred to as the "Firm") and **Ms. Harjeet Bhatia** in response to your **Pre-Action Legal Notice** of Intended Claim dated **April 1, 2026** (hereinafter referred to as the "Notice").

The Firm **rejects entirely each and every allegation, demand, and characterisation** contained in the Notice. The claims advanced are legally misconceived, factually inaccurate, selectively constructed from the procedural record, and deliberate omission of facts and conduct that are directly attributable to Salah. All rights and remedies of the Firm and Ms. Harjeet are expressly reserved.

Our substantive response is set out below.

1. Lack of Legal Representation

The Firm would like to highlight that Salah conducted the DIFC proceedings himself for approximately **nine months**, from September 23, 2024 until the Firm came on record around June 30, 2025. That fact is central to the matter, and it cannot be avoided at all costs.

It is important to note that Salah is not legally trained and has no familiarity with DIFC procedure or the Rules of the DIFC Courts. Nonetheless, he chose to act in person in a complex commercial litigation. The procedural state of the case by mid-2025 reflects the consequences of that choice. By the time the Firm was instructed, the matter was already active, already managed by the Court, and already affected by earlier decisions taken without legal guidance. Hence, the Firm did not create that position and It just took over what was given. The Notice ignores the above in its entirety. The approach adopted by Salah was fundamentally flawed. Hence, responsibility cannot be assessed by selectively removing the context that gave rise to the situation in the first place.

Salah chose to proceed without representation in a forum that requires it. The consequences of that decision were followed. He cannot now turn things around as the Firm was instructed later in an already compromised case. Against that background, the Firm moved the case forward in the only way available. It prepared and filed amended Statements of Defence and a Counterclaim in line with the Court's permission. Draft amendments were submitted on July 28, 2025 and formally filed on 4 and 5 August 2025. These were steps taken to stabilise and progress a case that was already procedurally compromised.

The Notice ignores all of the above and presents a simplified version of events in which the Firm is said to be solely responsible for the Wasted costs outcome. It overlooks the condition of the case at the point where the Firm became involved and the fact that the Firm was dealing with the consequences of earlier decisions it did not make.

2. Burden of Costs falls on Salah

With regards to the Wasted Costs, the costs orders relied on in the Notice were made against Salah and the other Defendants in their personal capacity. They were not made against the Firm or Ms. Harjeet Bhatia as legal representatives.

The record is clearly being set out below:

- By Order dated 7 August 2025, the Court directed the Defendants to pay the Claimants wasted costs arising from the amendments to the Statements of Defence.
- By Order dated 4 September 2025, the Court struck out the amended Defences and ordered the Defendants to pay the Claimants' costs of the Strike Out Application.

- By Order with Reasons dated 24 March 2026, the Court assessed those costs at AED 343,953.75.

At no point did the Court make any Wasted costs order against the Firm under Rules of the DIFC Courts Part 38 or otherwise. The obligation to pay those costs sits with Salah, as parties to the proceedings.

3. The Firm was denied opportunity

According to the Notice, it presents that the citation issue was incomplete and skips over what actually happened and creates a misleading impression as the citation did not change the subject matter of the case. The Firm did not ignore the issue instead it identified the issue first and took all necessary measures to rectify it. On August 14, 2025, two weeks before the hearing on August 28, 2025, the Firm identified the concerns raised about certain authorities in the amended defences and took steps to deal with them. Copies of the relevant judgments were sent to the Claimants lawyers, and consent was requested to file a corrected version of the pleadings limited strictly to fixing case names and citations. There was no attempt to change the substance of the case.

At that point, the issue could have been resolved quickly and sensibly. Instead, the Claimant's lawyers chose not to engage and proceeded to raise the matter before the Court without mentioning that a solution had already been proposed. Lutfi attempted to contact the Claimant's lawyers on several occasions, particularly as the DIFC Rules require parties to seek the other side's counsel's approval; however, they did not oblige, even after being provided with the judgments containing the corrected citations. The Claimant's lawyers then chose to pursue a strike-out application, which was entirely their decision. This inevitably increased the costs of the case, but such costs are not attributable to the Firm.

When the strike out application was heard on August 28, 2025, no order had been officially made. There was still time to respond properly, to clarify the position, and to manage the consequences going forward. That opportunity was lost because of what transpired with the Claimant's lawyers. The matter could have been rectified through the court, clarifying the pending issue and other legal issues to avoid any Order regarding the Wasted costs but on September 2, 2025, Salah chose to bring the relationship with the Firm to an abrupt end. This was done without prior discussion and without giving the Firm any real chance to address the situation. As a result, the Firm was no longer in a position to

respond to the strike out application, explain the nature of the issue to the Court, or take steps to limit the impact on costs. From that point onward, the direction of the case was no longer shaped by the Firm. Salah acted on his own during the stages that followed, including the costs process. The final costs order in March 2026 was made months after the Firm had been removed from the record.

Accordingly, it would be inappropriate to hold the Firm responsible for the outcome when it was not given the opportunity to address the issue in the first instance.

4. Conclusion

The claims set out in the Notice are fundamentally flawed, both in fact and in law. They are based on a selective account of events that ignores the broader procedural history and, in particular, Salah's own role in shaping the outcome of these proceedings. The Firm would like to reiterate that the costs orders relied on were made against the Defendants, not against the Firm. No wasted costs order has ever been made against the Firm. Any attempt to recover those sums through a separate claim requires proof of breach, causation, and loss. None of those elements have been established here, and each is firmly disputed.

In light of the above, the Firm does not accept any liability whatsoever. Any proceedings brought on the basis of the Notice will be fully contested.

The Firm reserves all of its rights, including the right to rely on the matters set out above, to seek its own costs, to pursue any outstanding fees, and to take action in respect of the reputational harm caused by the allegations made on the court record. Any further substantive correspondence should be directed to the Firm's independent legal advisors, whose details will be provided separately.

This response is issued strictly **without prejudice to all rights, remedies, and defences available** to the Firm and to Ms. Harjeet Bhatia, all of which are expressly reserved.

Yours sincerely,



Lutfi & Co.

Advocates and Legal Consultants



Subject: RE: Service of Pre-Action Legal Notice of Intended Claim
Date: Friday, 3 April 2026 at 3:46:45 PM Gulf Standard Time
From: Harjeet <harjeet@lutfilaw.ae>
To: salah masry <salahmasry@live.com>
CC: Legal | Lutfilaw <hblegalteam@lutfilaw.ae>, Hair By Salah <hairbysalah@gmail.com>, valiullina1309 <valiullina1309@mail.ru>, Salman Lutfi <Salman@lutfilaw.ae>, Reinhard Collaco <Reinhard@lutfilaw.ae>

Dear Saleh

We acknowledge the receipt of your email dated 1st April ,2026 .

At the outset ,we would like to state here that contents of your email appear to be lacking any legal basis . This is particularly significant considering the fact that you independently undertook the procedure before the DIFC Registry to remove us as your legal representatives. Such action effectively deprived us of the opportunity to represent and defend your position in respect of the claim for costs filed by the Claimant.

In these circumstances, it is evident that you assumed full responsibility for the conduct and outcome of the said proceedings following our removal.

Further, please note that I am currently travelling and will return after approximately fifteen (15) days. Upon my return, I shall provide a detailed response to your email, together with all relevant supporting documentation, and expressly reserve all our rights in this regard.

Regards,
Harjeet kaur
Senior Consultant
Lutfi & Co
Advocates & Legal Consultants
9th Floor , O-14 Tower,
Business Bay,
Sheikh Zayed Road,
Dubai ,UAE,
P.O.Box-8812
Tel -009714 [4222555](tel:4222555)
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LUTFI & CO – NOTICE

Please notify us if this has been sent to you by mistake. If it has, then any client legal privilege is not waived and you are not entitled to use this in any way. Please note that all e-mail to and from our servers is treated as correspondence with Lutfi & Co for the purposes of storage, access and review. Any opinion expressed in this email is not legal advice or the opinion of our firm, unless that is stated or apparent from its terms.

From: salah masry <salahmasry@live.com>
Sent: Wednesday, 1 April 2026 10:43 AM
To: Harjeet <harjeet@lutfilaw.ae>; info@lutfidifc.com

Cc: Legal | Lutfilaw <hblegalteam@lutfilaw.ae>; Hair By Salah <hairbysalah@gmail.com>; valiullina1309 <valiullina1309@mail.ru>; Salman Lutfi <Salman@lutfilaw.ae>

Subject: Service of Pre-Action Legal Notice of Intended Claim

Importance: High

Dear Sirs / Dear Ms. Harjeet Bhatia,

Please find attached the notarised **Pre-Action Legal Notice of Intended Claim** dated 1 April 2026.

This email serves as formal notification and service of the Notice upon:

1. **Lutf and Co. Advocates and Legal Consultants**
2. **Ms. Harjeet Bhatia**

The Notice concerns your firm's and Ms. Bhatia's conduct in connection with legal representation provided in DIFC Courts proceedings under case reference **CFI-066-2024**, and sets out the claims, losses, and remedies sought.

You are requested to review the Notice in full and provide your substantive written response within **7 days from the date of the Notice**, as specified therein.

For the avoidance of doubt, all rights, remedies, and causes of action are expressly reserved.

Kindly acknowledge receipt of this email and the attached Notice.

Yours faithfully,

Mr. Salah Masri

On behalf of himself and Ms. Iuliia Valiullina