

Claim No: CFI-066-2024

Witness Statement (1)

Of Salah Masri (SM)

On behalf of the First Defendant

Dated 22 July 2025

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON LLC

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

Defendants

Claim No: CFI-066-2024

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON

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) LULIA VALIULLINA

Defendants

FIRST WITNESS STATEMENT OF SALAH MASRI a.k.a

SALAH MOHAMED ADEL AL MASRI

I, Salah Masri a.k.a Salah Mohamed Adel Al Masri, of Syrian National, holder of Passport number 104-22-L018139 and having his address at 2419, Liberty House Tower, DIFC, Dubai, UAE, do solemnly affirm as follows:

1. Unless specified otherwise, all statements made in this witness statement are based on my personal knowledge.
2. I am the First Defendant in case no - CFI-066-2024 .
3. I provide this witness statement in connection with the **Case Management Order dated 18 April 2025** issued by H.E. Justice Thomas Bathurst and the earlier **Case Management Conference held on 3 March 2025**.
4. At the time of the Case Management Conference, I was acting as a **self-represented litigant** and appeared on behalf of myself (First Defendant), and for the Second and Third Defendants upon their instructions. I did not have the benefit of legal advice during or immediately after the hearing. My understanding of the Court's procedural requirements was limited and based on personal effort and interpretation.
5. Following the hearing, I took steps to comply with the Court's directions to the best of my ability. In particular, I focused on the requirements under **Paragraph 2** of the Case Management Order, which directed the production of banking and contractual records identified by the Claimants.
6. The requested documents were submitted in two phases:
 - a. First set on **7 March 2025**;
 - b. Second set on **27 March 2025**.

The documents included:

- a. RAK Bank loan agreements for loan number 20669222 and 20649173;
- b. Loan clearance letter issued by RAK Bank dated May 07, 2024, for loan agreement number 20649173.

- c. Transfer records to Liberty House, DIFC Investments;
 - d. Documentation related to payments involving the Third Defendant.
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7. However, due to my self-represented status and limited knowledge of the rules of DIFC Court and its procedure, I failed to produce standard documents as required under **Paragraph 1** of the Order by the deadline of **21 April 2025**. I now understand that this was a distinct obligation requiring separate formatting and production. My legal representatives are currently preparing the standard production in accordance with the Court's format requirements and will file the same without delay. I respectfully seek the Court's indulgence to allow me to rectify my earlier oversight.
 8. Recognizing the complexity of the proceedings, I subsequently engaged **Lutfi & Co. Advocates and Legal Consultants** to formally represent me and assist with all procedural and substantive matters. Counsel has since been working to regularize the record and address any outstanding obligations.
 9. Pursuant to **Paragraph 3** of the Case Management Order, I served the Court's disclosure direction on **RAK Bank** in person by visiting their _____ branch on April 14, 2025, and again on July 21, 2025, requesting production of the bank statements and loan documents having reference in the proceedings. An acknowledgment email was received on **22 July 2025**, although the Bank has not yet provided the required affidavit or full statements, reportedly due to a pending loan installment payment for the month of July. A copy of the email received from RAK Bank is annexed to this statement as **WS1-SM-1**.
 10. Given the importance of these records in substantiating the nature and timing of various transfers, I respectfully request that the Honorable Court issue a direction to **RAK Bank** to provide the said bank statements and loan documents directly, in order to accurately identify the relevant loan disbursements and deductions.
 11. Further, as I presented during the **Case Management Conference on 3 March 2025**, the DIFC entity **Hair by Rojin** is owned by my ex-wife. The payments made from the **Second Claimant's** account to Hair by Rojin occurred **prior to the signing of the Memorandum of Understanding (MOU)** between myself and the First Claimant. These payments were **maintenance payments** intended for the benefit of my **children and ex-wife**.
 12. In support of the above, I submitted a copy of the **divorce certificate** on **7 March 2025** and again on **27 March 2025**. Although I am presently unable to identify with precision the exact amount transferred to Hair by Rojin, I confirm that **all such transfers were made prior to the signing of the MOU** and were exclusively **maintenance-related in nature**.

13. Furthermore, I wish to bring to the Court's attention that there was no written agreement between myself and the First Claimant requiring the Second Claimant's bank account to be zeroed prior to the transfer of ownership. However, it was an understood and mutually acknowledged arrangement between us. In line with this understanding, I shared a screenshot of the Second Claimant's bank account dated 1 April 2024, reflecting the balance after I had withdrawn the sales profit generated until the period of March 2024, with the First Claimant's representative, Ms. Marsela. The copy of this WhatsApp conversation is attached to this statement as **WS1-SM-2**.

14. I am also aware of the objections raised by the Claimants regarding the adequacy of my prior document production. I have reviewed these matters with my legal representatives and confirm that we will address the same by way of supplemental production on July 24, 2025, as directed by H.E. Justice Thomas Bathurst on **July 18, 2025**.

15. I remain fully committed to cooperating with the Court and the Claimants, and to complying with all outstanding procedural obligations, including the service of witness statements as set out in the Case Management Order.

Statement of Truth

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

Signed:



Name: Salah Masri a.k.a Salah Mohamed Adel Al Masri

Dated: July 22, 2025

Claim No: CFI-066-2024

Witness Statement (2)

Of Salah Masri (SM)

On behalf of the First Defendant

Dated 22 July 2025

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON LLC

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

Defendants

Claim No: CFI-066-2024

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON

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) LULIIA VALIULLINA

Defendants

SECOND WITNESS STATEMENT OF SALAH MASRI a.k.a

SALAH MOHAMED ADEL AL MASRI

I, Salah Mohamed Adel Al Masri, a Syrian national, holder of Passport No. 104-22-L018139, and residing at 2419, Liberty House Tower, DIFC, Dubai, UAE, do solemnly affirm as follows:

1. I am the **First Defendant** in case no - CFI-066-2024 and I hereby make this statement in support of the application seeking the Court's permission to amend the original Statement of Defense.
2. The original Statement of Defense was filed by me on November 21, 2024, at a time when I was self-representing and acting in person for myself and on behalf of the Second and Third Defendants upon their instructions. It is pertinent to mention here that the original statement of defense was a combined one for and on behalf of first three defendants.
3. Further on, I also filed a separate Statement of Defense on behalf of the **Third Defendant** on **November 25, 2024**, upon her instructions.
4. At that stage, I did my best to respond to the allegations raised in the Claim Form. However, in the absence of any legal knowledge and basic understanding of the rules of DIF Courts, all the submissions made by me as here in above stated, lacked the procedural structure and legal grounds as required under the Rules of the DIFC Courts.
5. After retaining **Lutfi & Co. Advocates and Legal Consultants** as my legal representatives, I was advised that the previously filed defense did not meet the necessary standards under **RDC Part 16** and may not be considered by the trial judge in its current form.
6. My legal representatives have now prepared an amended Statement of Defense on my behalf (as well as for the Second and Third Defendants separately) to ensure that our position is accurately and fully pleaded.
7. The key changes we seek to make include:
 - a. Properly structured and clear response to the Claimant's allegations;

- b. Providing legal grounds and documentary references to support our position;
 - c. Addressing and consolidating the claims involving the Second and Third Defendants, who were not clearly represented in the original statement of Defense filed on November 25, 2025.
8. The amendment is necessary to give full effect to my legal right to be heard and to present a proper defense in line with the objective of the DIFC Courts to deal with matters justly and fairly.
9. **There is no prejudice caused to the Claimant by permitting this amendment.** On the contrary, allowing the Defendants to amend the Statement of Defense at this stage promotes procedural fairness and efficiency. In particular:
- a. The Claimant has not filed any Reply to the original Statement of Defense filed by me on November 21, 2024. Therefore, permitting an amendment now would not disrupt or undo any responsive pleadings or procedural steps already taken by the Claimant.
 - b. The Claimant has also not yet served the Claim Form and related documents on the proposed Fourth Defendant, **HairbyRojin LTD**. This entity was to be added pursuant to the **Case Management Order dated 18 April 2025**, following the **Case Management Conference on 3 March 2025**, where the Court granted the Claimant liberty to amend the Claim and Particulars of Claim to include HairbyRojin LTD as a Fourth Defendant.
 - c. Under paragraph 16 of the Case Management Order, the Claimant was directed to serve and file the amended Claim and Particulars of Claim by **4:00 PM on 24 March 2025**. As of the date of this witness statement, service on the Fourth Defendant has not occurred. Once service is effected, the Fourth Defendant will be entitled to file its defense within the time limits prescribed under the **Rules of the DIFC Courts**. This in itself will result in an extension of the overall timeline of proceedings, regardless of whether the Defendants' amendment is permitted.
 - d. Accordingly, granting permission to amend the current Statement of Defense now will not delay proceedings further. Instead, it will allow for all parties' positions to be properly and fully pleaded in a coordinated manner, without causing any procedural prejudice to the Claimant.
10. Accordingly, I respectfully submit that allowing the amendment now will not delay proceedings and is in the interest of fairness and efficiency.
11. If permission to amend is not granted, I understand that the Defense on file may not be accepted or relied upon at trial, placing me and the other

Defendants at an unfair procedural disadvantage.

Statement of Truth

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

Signed: 

Name: Salah Masri a.k.a Salah Mohamed Adel Al Masri

Dated: July 22, 2025

Claim No: CFI-066-2024

Witness Statement (1)

Of Luliia Valiullina (LV)

On behalf of the Third Defendant

Dated 22 July 2025

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON LLC

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) LULIIA VALIULLINA

Defendants

Claim No: CFI-066-2024

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON

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) LULIIA VALIULLINA

Defendants

FIRST WITNESS STATEMENT OF LULIIA 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 make this statement based on my personal knowledge unless otherwise stated.
2. I provide this witness statement in connection with the **Case Management Order dated 18 April 2025** issued by H.E. Justice Thomas Bathurst and the earlier **Case Management Conference held on 3 March 2025**.
3. At the time of the Case Management Conference, I was not legally represented by a Counsel. I had instructed the First Defendant, Mr. Salah Masri, to appear for and on my behalf, as he was more familiar with the ongoing matter and had already submitted a Statement of Defense for and on my behalf upon my instructions on November 21, 2024, and later on November 25, 2024.
4. While I was generally aware of the proceedings, I did not fully understand the implications of the Court's procedural requirements or the consequences of the Case Management Order. I relied on Mr. Masri to represent my position in good faith, given his prior involvement and relationship with the Claimants.
5. Following the issuance of the Case Management Order, I did not take timely steps to produce documents or ensure compliance with the deadlines prescribed under Paragraphs 1 and 2 of the Order. This was not due to unwillingness or intent to delay but stemmed from my lack of knowledge concerning legal and procedural requirements under the **Rules of the DIFC Courts**.
6. I was particularly unaware of the format required for **standard production** (due by April 21, 2025), or the scope of specific disclosures outlined in the Claimants' Case Management Information Sheet. These were not submitted in time, and I respectfully acknowledge that this amounts to procedural non-compliance.
7. Since then, I have appointed **Lutfi & Co. Advocates and Legal Consultants**

as my legal representatives. Upon their review, I became aware of the procedural deficiencies and the need to regularize my position before the Court. I am now cooperating fully with counsel to ensure all obligations are met.

8. My legal representatives are currently preparing the standard production in accordance with the Court's format requirements and will file the same without delay on July 24, 2025. I respectfully seek the Court's indulgence for the earlier oversight.
9. I further understand, based on the Claimant's submissions and discussions with the First Defendant, that certain payments or references made to me in this case pertain to events or transactions that took place **prior to my involvement** in the dispute. These references appear to be based on a misunderstanding of my role and timing of involvement. I intend to address and clarify these matters through the **amended Statement of Defense** and any further evidence submitted on my behalf.
10. I respectfully confirm that I am committed to cooperating with the Court and the Parties in this case. I will comply with all procedural obligations, including disclosure of any documents or facts and witness evidence, as directed by the Court in the Case Management Order.

Statement of Truth

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

Signed:

Name: Luliia Valiullina



Dated: July 22, 2025

Claim No: CFI-066-2024

Witness Statement (2)

Of Luliia Valiullina (LV)

On behalf of the Third Defendant

Dated 22 July 2025

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON LLC

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) LULIIA VALIULLINA

Defendants

Claim No: CFI-066-2024

IN THE DIFC COURTS

COURT OF FIRST INSTANCE

BETWEEN:

(1) KLESTA ESHJA

(2) HAIR CREATORS SALON

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) LULIIA VALIULLINA

Defendants

SECOND WITNESS STATEMENT OF LULIIA 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 make this statement in support of the application for permission to amend the original Statement of Defense previously submitted for and on my behalf by the First Defendant.
2. On November 21, 2024, a combined Statement of Defense and on **25 November 2024**, a separate Statement of Defense was submitted for and on my behalf by the First Defendant, Mr. Salah Masri. At that time, I was not legally represented by a Counsel and had instructed Mr. Masri to file a defense for and on my behalf in good faith.
3. However, I have now been advised by my legal representatives, Lutfi & Co. Advocates and Legal Consultants that the original statement of defense filed on my behalf does not meet the requirements of **Part 16 of the Rules of the DIFC Courts**, and that it does not properly or adequately reflect my position in this dispute.
4. I confirm to the Honorable Court, that I was **not a party to the Share Purchase Agreement (SPA)** or the **Memorandum of Understanding (MOU)** signed between the First Claimant and the Second Defendant, nor was I involved in the negotiations or execution of these documents.
5. At the time the SPA and MOU were executed, I was **merely employed by the Second Claimant**, Hair Creators Salon LLC. I had no shareholding, management authority, or decision-making involvement in the matters addressed in the Claimants' pleadings.
6. I have now engaged **Lutfi & Co. Advocates and Legal Consultants** as my legal representatives. They have reviewed the pleadings and prepared an **Amended Statement of Defense**, to be submitted in the Court.
7. Through this amendment, 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 original defense, which was submitted without the benefit of legal support and assistance;
 - d. Preserve my legal right to be heard fairly and on the basis of accurate pleadings.
8. **There is no prejudice caused to the Claimant by permitting this amendment.** On the contrary, allowing the Defendants to amend the Statement of Defense at this stage promotes procedural fairness and efficiency. In particular:
- a. The Claimant has not filed any Reply to the original Statement of Defense filed by me on November 21, 2024. Therefore, permitting an amendment now would not disrupt or undo any responsive pleadings or procedural steps already taken by the Claimant.
 - b. The Claimant has also not yet served the Claim Form and related documents on the proposed Fourth Defendant, **HairbyRojin LTD**. This entity was to be added pursuant to the **Case Management Order dated 18 April 2025**, following the **Case Management Conference on 3 March 2025**, where the Court granted the Claimant liberty to amend the Claim and Particulars of Claim to include HairbyRojin LTD as a Fourth Defendant.
 - c. Under paragraph 16 of the Case Management Order, the Claimant was directed to serve and file the amended Claim and Particulars of Claim by **4:00 PM on 24 March 2025**. As of the date of this witness statement, service on the Fourth Defendant has not occurred. Once service is effected, the Fourth Defendant will be entitled to file its defense within the time limits prescribed under the **Rules of the DIFC Courts**. This in itself will result in an extension of the overall timeline of proceedings, regardless of whether the Defendants' amendment is permitted.
9. Accordingly, granting permission to amend the Statement of Defense at this stage will not cause further delay. Rather, it will ensure that the positions of all parties are properly and fully presented in a coordinated manner, without causing any procedural disadvantage to the Claimant.
10. I confirm that this application is made in good faith and not for the purpose of delay, but rather 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.

Signed:

Name: Luliia Valiullina

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

Dated: July 22, 2025

:

Statement of Truth

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

Signed:

Name: Luliia Valiullina

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

Dated: July 22. 2025

: