

KANZLEI RITTER

Anwaltskanzlei Ritter Allacher Straße 217 a 80997 München

Industrial court
In Split
Sukoisanska 6
21000 Split/Croatia

URGENT

Republika Hrvatska
TRGOVAČKI SUD U SPLITU
SPLIT

IZ RUKE

23 -01- 2023

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Bitte immer angeben!

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2. by Fax: 00385/21/481242

predano za poštu obično-prep. dne. 20.

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München, den 20.01.2023

Poslovni broj: 7 St-528/2022-4

Firm Dobrinca d.o.o., OIB: 41962885095

Insolvency Application Procedure

Dear Judge Mr Culic,

I report the legal representation of Mrs. Meli Ritter, Allacher Straße 217, Munich/Germany, in the above case.

Ms Ritter was only able to read/read the court's letter of 21.12.2022 due to leave on 09.01.2023. therefore, unfortunately, the opinion is only coming today.

Attention! Meli Ritter and I are completely surprised by this insolvency application of the tax office, as the other shareholder Nikola Skender has not informed us for a long time here in Germany. Rather, he has stolen all the money (see below) and is now trying more to take away the valuable building plot of the Dobrinca and sell it alone. The property has a value of approx. 600.000,00 €!

We would therefore like to prevent insolvency proceedings and pay the debts mentioned in the application to the tax office of approx. 9.000.00 kn as soon as possible.

At the same time, we try to find out from the tax office what debts are involved. Because even the tax consultant Ivanovic knows nothing about it. She thinks that all taxes and social security contributions have been paid.

As soon as this is clarified and we know an account details of the tax office, will be transferred from here immediately.

Unfortunately, we cannot attend the court date on 25 January from here. We are still trying to send a representative or lawyer. Can the appointment be postponed by 2 or 3 weeks?

1. As is well known, Mrs. Meli Ritter is a shareholder with 50%, as well as managing director. I, Armin Ritter, have known the other shareholder Nikola Skender for many years from Germany. I am the financier of the entire project and the company Dobrinca.

2. Meli Ritter only took over the company share on 23.02.2021 from Marko Skender, father of Nikola Skender, who has since passed away.

The aim was a construction project on the Donja Pocrana property, corridor number 2399/1. Marko Skender transferred this property, which was previously owned by him, to the company Dobrinca d.o.o. with a contract dated 09.12.2020.

Bankverbindungen:

Hypo Vereinsbank
IBAN: DE53700202700041133007
BIC: HYVEDRMMXXX

Postbank München
IBAN: DE58700100800005267800
BIC: PBNKDEFF

The property therefore now belongs to the company Dobrinca d.o.o., whose registered capital increased to 4,390,000 kuna.

Dobrinca d.o.o. is managed by tax advisor Smiljana Ivanovic, Spalatum Libri, Putrakovica 44, 21214 Kastel.I Kambelovac. Mrs. Ivanovic also confirmed our request that the property in Pocrana with about 1,000 square meters in the Dobrinca d.o.o. is booked. Dobrinca d.o.o. is therefore the owner of this property.

With my investment of about 300,000 EUR so far, the entire debt on this property was paid, a building permit for an apartment building with 10 apartments was obtained and finally construction began. I provided the company with a loan of 600,000.00 KN. This has been paid into the company's bank account at IMEX Bank. Bank statements are available.

3. With contract from February 2021 we have ordered Nikola Skender to prosecute the development in Podstrana. He should be concluding contracts with building enterprises and start construction of the house.

Parallel he should have found a bank financing, he'd consider possible. Back then we had conversations with the IMEX Bank.

Furthermore he should have started to sell the apartments from the plan.

Unfortunately Nikola Skender doesn't stick to the contract and he took the loan in the amount of 600.000 KN that was given to the society. For the construction he used almost nothing.

He also does not get any financing.

Unfortunately he concealed everything, showed us no documents and no bank statements. Suddenly there was no money.

From there we / the society have compensation claims against Nikola Skender in high altitude.

Skender is secretly trying to take over the valuable property.

His plan is that DOBRINCE d.o.o. will be deleted by this insolvency procedure.

He then wants to sell the valuable and unencumbered or free property alone.

Because illegally he and his deceased father did not register the property on DOBRINCE d.o.o. in the land register. According to the new land register excerpt, the late Marko Skender is still the owner. This is, of course, wrong. However, Skender can probably sell the property to a third party. This must be prevented!

End of last year, Nikola Skender made the exact same story with an other common property in Okrug Donji / Ciovo.

Here, too, he has secretly sold the property as an alleged liquidator and wants to steal the 50% purchase price from us. He collected and hid about EUR 600,000 alone.

So if the court hearing takes place and Nikola Skender appears, don't believe him. He's lying. Further documents to prove my presentation can be submitted at any time.

Thank you for your quick reply, preferably by e-mail.

Yours sincerely

Armin Ritter
Lawyer

