



Recognised by the IOC - Member SportAccord, ARISF, IWGA and IMGA

## 5 The General Secretary

Singapore, October 25, 2016

## **DELIVERED ONLY BY E-MAIL**

RDSU and
 Ms. Irina Petrova
 Valentin Yudashkin, Valentin Yatsenko, Sergey Martinenko, Yuriy Sivers,
 Alexey Bazanov, Irina Vikulova, Vladimir Karpunin, Tatyana Snigur, Vladimir
 Titov, Michael Fratkin, Nikolay Savinov, Dmitriy Nikiforov, Vladimir
 Shturkin, Sergey Volkov, Rauf Salahutdinov

Moscow, Russia

20 Dear Colleagues:

## **LETTER OF DEMAND**

## **DEMAND FOR APPOINTMENT OF REPRESENTATIVE**

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You have openly, explicitly committed numerous material breaches of our WDSF Grand Slam Series agreement which we signed with you at Moscow on July 20, 2012 ("the GS Agreement), including the fundamental breach of abandoning production of Moscow leg of the 2016 Grand Slam Series at the 2016 Russian Open which was agreed and scheduled to be produced by you on October 28-30, without any justification in law, and you have done so without regard to law (or the welfare of Russian and other DanceSport athletes).

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- We have taken steps to mitigate our damages but still anticipate that we and will suffer significant damages. We will look to you pay those damages.
- We hereby place you on notice that we will be commencing legal collections proceedings against you in that regard and that we require you to preserve RDSU's assets pending resolution of our claims.
- You are bound by the GS Agreement and will remain bound by it following your anticipated expulsion as a Member of WDSF.



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Pursuant to Paragraph 15 of the GS Agreement, prior to initiating formal legal proceedings to enforce our rights, we now call upon you to appoint one senior representative who is fully empowered to make binding decisions on behalf of RDSU in the dispute.

You are obliged to make that appointment of your representative and schedule a meeting or meetings with respect thereto promptly and in the utmost good faith.

We hereby notify you that we appoint Mr James Fraser as our representative and demand that you appoint your representative by notice to us in writing no later than 18:00 Central European Time on October 28, 2016, failing which we shall deem you to have failed to fulfill your responsibilities with respect thereto and to have wilfully frustrated the dispute resolution process set out in Paragraph 15, and shall feel free to commence formal legal proceedings or otherwise as we see fit, without further notice to you.

In addition and separate and apart from our demand for the appointment of your representative we may apply to a court for urgent injunctive relief, without further notice to you.

GOVERN YOURSELVES ACCORDINGLY.

We look forward to hearing from you immediately and in any event no later than 18:00 on October 28, 2016; the sooner the better.

Yours truly,



WORLD DANCESPORT FEDERATION

per:

SHAWN TAY
General Secretary

cc. WDSF Presidium

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