

**BUROFAX PREMIUM ONLINE**

Fecha y hora de admisión: 31/08/2023 11:50

EXPEDIDOR  
Monereo Meyer Abogados, S.L.  
Calle Agustín de Foxá, 4, 5ª planta  
28036 MADRID

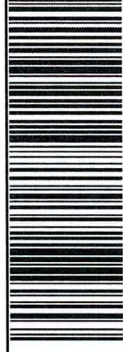
CodiRed oficina de origen: 2840294

Oficina de origen:

OFICINA VIRTUAL EN INTERNET

Nº Páginas: 5

Valores añadidos  
PEE (Prueba de Entrega Electrónica)  
Copia certificada  
CUSTODIA 60 MESES



NB990137193310823001570

Menciones de servicio:

DESTINATARIO  
Innovación y Tecnología Avanzada, SL - Innovación y Tecnología Avanzada, SL

Calle Albert Einstein, Poligono Salinas No:21

11500 PUERTO DE SANTA MARÍA (EL)

**W A L L E S S**Estonia  
Latvia  
Lithuania

Tallinn, 30 August 2023

**Baublock Materiales Avanzados De Construcción, S.L**  
C/ Albert Einstein, Número 21, Polígono Salinas 11500 Puerto De  
Santa María, El 11500 Cádiz

**Innovación y Tecnología Avanzada, S.L**  
C/ Albert Einstein, Número 21, Polígono Salinas 11500 Puerto De  
Santa María, El 11500 Cádiz

Re: Letter of Claim

**Dear Mr. Vladimir Savenkov,**

Law firm WALLLESS is the legal representative of Bauroc AS (hereinafter "Bauroc"), on behalf of whom we send you this letter of claim (Annex 1).

Since the 1<sup>st</sup> of April 2016, Elina Liepa has worked at Bauroc as a Chief Technologist.

On the 31<sup>st</sup> of January 2023, Bauroc's management received a statement from E. Liepa, announcing that she *will be working in Bauroc Andja as Chief Technologist till the end of the April* and that she has *taken up to a new challenge as a Director of Technological Development and R+D+I in Spain*. Bauroc respected this wish and assumed that the termination of the employment will take place in good faith, considering the long-term relationship of the parties.

At the beginning of April 2023, it became known to Bauroc, however, that E. Liepa had already taken on the job as Director of Technological Development and R+D+I at BAUBLOCK MATERIALES AVANZADOS DE CONSTRUCCION S L (hereinafter Baublock)<sup>1</sup>, even though her employment contract with Bauroc was valid until 30<sup>th</sup> of April 2023.

Moreover, in August 2023, Bauroc found out that E. Liepa had started contacting existing employees of Bauroc with the intention of inviting them to work for Baublock already since March 2023. So far, this has even led to the termination of employment contract with at least one Bauroc's employee.

Furthermore, after concluding an internal investigation, Bauroc has now discovered that E. Liepa had sent a total of 44 e-mails, which contain Bauroc's business and manufacturing secrets, from her former Bauroc e-mail account to her personal e-mail address between 8<sup>th</sup> of March 2023 and 9<sup>th</sup> of March 2023, i.e., just before start of her employment at Baublock.

Moreover, E. Liepa made sure that, after she had acquired those e-mails, E. Liepa filed these documents both in the "deleted" as well as "permanently deleted" folders. This means that E. Liepa had acknowledged her wrongdoing and had hoped that this would later pass unnoticed.

**Taking into account the circumstances around termination of E. Liepa's employment, as well as the overall course of events, it is clear that the proposition to illicitly acquire Bauroc's business secrets and to make attempts to solicit our employees to work for Baublock, our competitor,**

<sup>1</sup> This is indicated by the new phone number, new e-mail address, new business card, spreading Baublock's social media posts in LinkedIn, etc.