

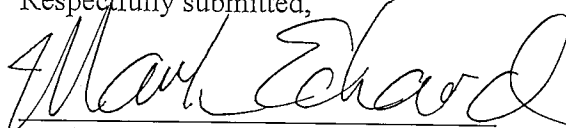
1. This action has already been brought and is already *sub judice* elsewhere.
2. Splitting of Causes of Action Prohibited: To the extent that there is any claim here that was not included in the 2013 St. Croix Action, it should have been -- and failure to bring it there obviates taking a second bite of the apple here.

WHEREFORE, for the reasons set forth herein and in the Memorandum of Law in support hereof and in any Reply in Further Support hereof, Waleed Hamed respectfully requests that the Court (i) enter an Order in substantially the same form as that attached hereto as Exhibit A, dismissing the First Amended Counterclaim as to Waleed Hamed, with prejudice, and ordering Counterclaim Plaintiffs to pay Waleed Hamed's attorneys' fees and costs incurred in connection with his defense against counterclaims stated against him stated in this action and (ii) grant to Waleed Hamed such other and further relief as is just and proper.

Respectfully submitted,

Dated: February 21, 2014

By:



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[Certificate of Service on Following Page]

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of February, 2014, I served a copy of the foregoing Memorandum by email, as agreed by the parties, on:

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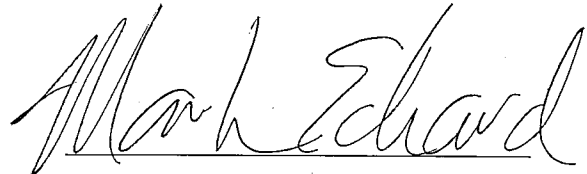
A handwritten signature in cursive script, appearing to read "Mark Edward", written over a horizontal line.

EXHIBIT A

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

MOHAMMAD HAMED, by his)
authorized agent **WALEED HAMED**,)
)
Plaintiff/Counterclaim Defendant,)
)
vs.)
)
FATHI YUSUF and)
UNITED CORPORATION,)
)
Defendants/Counterclaimants,)
)
vs.)
)
WALEED HAMED, WAHEED)
HAMED, MUFEEED HAMED,)
HISHAM HAMED,)
and **PLESSEN ENTERPRISES, INC.**,)
)
Counterclaim Defendants.)
_____)

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF

JURY TRIAL DEMANDED

ORDER

Upon consideration of the Motion to Dismiss First Amended Counterclaim as to Waleed Hamed (the "Motion"), and the Court being fully advised in the premises, it is hereby:

ORDERED that the First Amended Counterclaim filed in the above-captioned civil action is dismissed as to Waleed Hamed, **with prejudice**.

Dated: _____

SUPERIOR COURT JUDGE

ATTEST:

Deputy Clerk