

03/13/2015

VERONICA HANDY, ESQUIRE
CLERK OF THE COURT

IN THE SUPREME COURT OF THE VIRGIN ISLANDS

FAHTI YUSUF,

Appellant/Defendant,

v.

MOHAMMAD HAMED, et al.

Appellees/Plaintiffs.

S. Ct. Civ. No. 2015-0001

Re: Super. Ct. Civ. No. 370/2012
(STX)

Consolidated Cases

S. Ct. Civ. No. 2015-0001

S. Ct. Civ. No. 2015-0009

APPELLEE'S MOTION FOR FEES

Appellee, Mohammad Hamed, hereby requests attorneys' fees pursuant to V.I. Supreme Court Rule 30, which permits the award of fees to the Appellee if an appeal is dismissed, as occurred here. In this case, the decision below was affirmed as to all of the multiple issues raised on appeal except for one aspect of the appeal regarding the amount of the bond that the court below directed to be posted.

In support of this motion, Appellee's counsel have submitted declarations as to the fees actually charged for the work done on this appeal, **but limited solely to the jurisdictional issue**, as no fees are sought for any other work done related to this appeal (i.e. the motion to stay, etc.). See **Exhibits 1 and 2**. The time taken to prepare this motion was not included either. Finally, while the Appellee also was billed separately for paralegal time related to this appeal that cost is not being sought either.

Subject to the foregoing limitations, the fees expended to prosecute this appeal are \$12,300.00 and \$9,912.00 respectively for the two counsel who worked on this appeal, or a total of \$22,212.00. Because the costs associated with the appeal are minimal, no further award is being sought for these costs.

03/13/2015

VERONICA HANDY, ESQUIRE
CLERK OF THE COURT

Motion for Fees
Page 2

This appeal was expedited and the jurisdictional issue required immediate attention of counsel. It was successfully prosecuted by counsel. As such, the Appellee respectfully requests that this Court award him a total of \$22,212.00 as reimbursement of attorneys' fees incurred for this appeal.

Dated: March 13, 2015

/s/ Joel H. Holt

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CERTIFICATE OF SERVICE

I certify that a copy of the above document was served through the Court's Electronic filing system on opposing counsel of record this 13th day of March, 2015:

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/s/ Joel H. Holt