

**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 and Counterclaimants.

vs.

**WALEED HAMED, WAHEED HAMED,
MUFEED HAMED, HISHAM HAMED, and
PLESSEN ENTERPRISES, INC.,**

Counterclaim Defendants.

Case No.: SX-2012-cv-370

**ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

JURY TRIAL DEMANDED

MOHAMMAD HAMED,

Plaintiff,
vs.

FATHI YUSUF,

Defendant.

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

**PLAINTIFF'S NOTICE OF OBJECTION TO LIQUIDATING PARTNER'S
ELEVENTH BI-MONTHLY REPORT**

The Liquidating Partner's Sixth Bi-Monthly Report, filed December 1, 2016, is once again filled with self-serving and inaccurate statements. As such, Hamed hereby submits a general objection to that report

Much of the report restates assertions from reports 1-10 – Plaintiff incorporates his prior objections 1-10 herein.

Because requests for even the most basic information such as cancelled checks, vendor invoices and operating bank statements apparently cannot be provided/answered. Hamed also objects to the provided "financials" which are just Yusuf's manipulated statements based on no disclosed backup.

As to the only new assertions made (below) Hamed responds that his counsel spoke directly with the Master, and received specific permission to file when and how he did. Yusuf is simply arguing his case in the form of this Report.

While Yusuf submitted his Accounting Claims and Proposed Distribution Plan to the Master and counsel for Hamed on September 30, 2016, as required by § 9, Step 6, of the Plan, the November 13, 2015 Order, and the Master's directives, **Hamed filed his objection and accounting claims with this Court on September 30, 2016 in direct violation of these Plan provisions, Orders, and directives.** These improper filings are the subject of fully briefed motions to strike filed by Yusuf on October 14, 2016 and October 24, 2016.

Finally, Hamed again disagrees with any payments to Yusuf or Gaffney which are not supported by time sheets or other proof of hours works, and seeks recovery of those amounts.

Dated: December 8, 2016



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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of December, 2016, I served a copy of the foregoing by email, as agreed by the parties, on:

Hon. Edgar Ross
Special Master
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