**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

**WALEED HAMED**, as Executor of the )

Estate of MOHAMMAD HAMED, )

)

Plaintiff/Counterclaim Defendant, ) **CIVIL NO. SX-12-CV-370**

**)**

v. )

) **ACTION FOR INJUNCTIVE**

**FATHI YUSUF** and **UNITED CORPORATION**, ) **RELIEF, DECLARATORY**

) **JUDGMENT, AND**

Defendants/Counterclaimants, ) **PARTNERSHIP DISSOLUTION,**

) **WIND UP, AND ACCOUNTING**

v. )

)

**WALEED HAMED**, **WAHEED HAMED**, )

**MUFEED HAMED**, **HISHAM HAMED**, and )

**PLESSEN ENTERPRISES, INC.**, )

)

Additional Counterclaim Defendants. ) **Consolidated With**

)

**)**

**WALEED HAMED**, as Executor of the )

Estate of MOHAMMAD HAMED, )

) **CIVIL NO. SX-14-CV-287**

Plaintiff, )

) **ACTION FOR DAMAGES AND**

v. ) **DECLARATORY JUDGMENT**

)

**UNITED CORPORATION**,)

)

Defendant. )

)

)

**WALEED HAMED**, as Executor of the )

Estate of MOHAMMAD HAMED, ) **CIVIL NO. SX-14-CV-278**

)

Plaintiff, ) **ACTION FOR DEBT AND**

v. ) **CONVERSION**

)

**FATHI YUSUF**, )

Defendant. )

)

**FATHI YUSUF** and )

**UNITED CORPORATION**, )

)

Plaintiffs, ) **CIVIL NO. ST-17-CV-384**

)

v. ) **ACTION TO SET ASIDE**

) **FRAUDULENT TRANSFERS**

**THE ESTATE OF MOHAMMAD HAMED**, )

**WALEED HAMED**, as Executor of the Estate of )

Mohammad Hamed, and **THE MOHAMMAD A.** )

**HAMED LIVING TRUST**, )

)

Defendants. )

)

**)**

**KAC357, INC.**, )

)

Plaintiff, ) **CASE NO.: SX-18-CV-219**

)

v. ) **ACTION FOR DEBT AND**

) **UNJUST ENRICHMENT**

**FATHI YUSUF**, a partner, and )

**THE HAMED-YUSUF PARTNERSHIP**  )

a/k/a **THE PLAZA EXTRA SUPERMARKET** )

**PARTNERSHIP**, )

)

Defendants. )

)

**MOTION FOR ORDER RE CONSOLIDATED CLAIMS ON STIPULATION**

The parties have entered into the attached Stipulation (**Exhibit A**) and ask the Special Master to enter the Proposed Order (**Exhibit B**).

Case No. SX-18-CV-219, was consolidated with this case by order dated August 15, 2018, and asserts claims of KAC357, Inc. (“KAC357”) against the partnership. KAC 357’s Claims against the partnership were originally presented to Master Ross in Hamed’s Revised Claims before the separate action was brought, and the parties believe that in the interests of judicial economy KAC357’s claims against the partnership should be resolved by Master Ross;

Thus the parties ask for the attached order which provides that:

1. KAC357’s claims previously included in Hamed’s Revised Claims are deemed re-presented against the partnership to Master Ross for resolution by him in a manner identical with all other Hamed Revised Claims; and
2. Defendants need not answer this Complaint, and instead KAC357 and Fathi Yusuf will henceforth file any necessary pleadings concerning KAC357’s claims against the partnership in the proceedings before Master Ross.

Respectfully submitted,

**Law Offices of Joel H. Holt**

**DATED**: August 22, 2018 By: A for

**JOEL H. HOLT**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 2nd day of August, 2018, I caused the foregoing motionto be served upon the following via the Case Anywhere docketing system:

**Hon. Edgar Ross**

Special Master

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**Stefan Herpel**

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**CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)**

This document complies with the page or word limitation set forth in Rule 6-1(e).

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