

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

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD 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

Consolidated with

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff,

vs.

UNITED CORPORATION,

Defendant.

Case No.: SX-2014-CV-287

**ACTION FOR DECLARATORY
JUDGMENT**

JURY TRIAL DEMANDED

Consolidated with

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

**HAMED'S REPLY AS TO CLAIMS NOS. H-38 AND H-123 --
PAYMENTS TO DUDLEY, TOPPER AND FEUERZEIG LAW FIRM**

This issue comes down to one fact -- which DTF and Yusuf dispute: Whether they expressly obtained the terms of the Winding Up Order on this contested issue by representing that they would not bill the Partnership. They either did or they did not. **If they did, these funds should be returned** to the Partnership.

If they did not, let them keep the funds, even though Yusuf used them to advance his own interests, and not those of the Partnership, which independent counsel would have done if retained. It is that simple. Hamed will rely on the already submitted documents at the time as to what was represented to the Court by DTF and Yusuf, which is the obvious, continuing basis for Hamed's repeated efforts to get these charges refunded.

Judge Brady's admonition that this not be decided while the Liquidating Partner was still marshaling the assets makes common sense. The argument that the Special Master should be burdened with the task of reviewing DTF's itemized billings is unrealistic, as those bills do not contain enough information to do that laborious task.

As such, this Claim is ripe for determination now that DTF is no longer involved in that manner.

Dated: January 19, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

Hon. Edgar Ross

Special Master
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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).



Carl J. Hamed