

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

**Case No.: SX-2014-CV-287**

**ACTION FOR DECLARATORY  
JUDGMENT**

JURY TRIAL DEMANDED

Consolidated with

**Case No.: SX-2014-CV-278**

**ACTION FOR DEBT AND  
CONVERSION**

JURY TRIAL DEMANDED

---

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

*Plaintiff,*

vs.

**UNITED CORPORATION,**

*Defendant.*

---

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

*Plaintiff,*

vs.

**FATHI YUSUF,**

*Defendant.*

**JOINT MOTION RE ADDITIONAL 40 DAYS IN ORDER**

The parties have jointly conferred as to how to move the case as the Court recently directed, and have done so extensively and diligently before making this very limited motion. They found dates that will allow them to effectively meet the January 15<sup>th</sup> deadline for the filing of dispositive motions established by the Joint Discovery and Scheduling Plan approved by the Master on January 29, 2018 (the "Plan").

However, they ask the Master, pursuant to his Order of July 31, 2018, to (1) allow them to engage in discovery provided for in Section B of the Plan outside of the deadlines established by the Plan *as long as they are completed before the dispositive motion deadline*, and (2) move the deadline for dispositive motions back 40 days -- from January 15<sup>th</sup> to February 25<sup>th</sup>, 2019 -- to better accommodate the Christmas and New Year's Holidays.

Counsel for both parties have cooperated on and agreed to make this motion, and Yusuf's counsel has agreed to have counsel for Hamed file this motion for both parties. If this minor change resulting in an additional 40 days is not acceptable to the Special Master, Counsel for the parties may need a telephonic status conference with the Master to discuss scheduling issues, as it will be impossible to meet certain of the deadlines already set: For example, Mr. Yusuf is overseas and cannot attend a deposition regarding H-142 before August 10<sup>th</sup>, and Attorney Holt had significant surgery yesterday and will not be on-island for a period.

**Dated:** August 3, 2018



**Carl J. Hartmann III, Esq. (Bar #48)**

*Co-Counsel for Plaintiff*

5000 Estate Coakley Bay, L-6  
Christiansted, VI 00820

Email: carl@carlhartmann.com

Tele: (340) 719-8941

Fax: (212) 202-3733

**Joel H. Holt, Esq.**

*Counsel for Plaintiff*

Law Offices of Joel H. Holt

2132 Company Street,  
Christiansted, VI 00820

Email: holtvi@aol.com

Tele: (340) 773-8709

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of August, 2018, I served a copy of the foregoing by email (Via CaseAnywhere), as agreed by the parties, on:

**Hon. Edgar Ross**

Special Master

edgarrossjudge@hotmail.com

**Gregory H. Hodges**

**Stefan Herpel**

**Charlotte Perrell**

Law House, 10000 Frederiksberg Gade

P.O. Box 756

St. Thomas, VI 00802

ghodges@dtflaw.com

**Mark W. Eckard**

Hamm, Eckard, LLP

5030 Anchor Way

Christiansted, VI 00820

mark@markeckard.com

**Jeffrey B. C. Moorhead**

CRT Brow Building

1132 King Street, Suite 3

Christiansted, VI 00820

jeffreymlaw@yahoo.com



**CERTIFICATE OF WORD/PAGE COUNT**

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

A handwritten signature in blue ink, reading "Carl J. Hand", with a long horizontal flourish extending to the right.