

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, )

v. )

FATHI YUSUF and UNITED CORPORATION, )

Defendants/Counterclaimants, )

v. )

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

Additional Counterclaim Defendants. )

CIVIL NO. SX-12-CV-370

ACTION FOR INJUNCTIVE  
RELIEF, DECLARATORY  
JUDGMENT, AND  
PARTNERSHIP DISSOLUTION,  
WIND UP, AND ACCOUNTING

Consolidated With

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

Plaintiff, )

v. )

UNITED CORPORATION, )

Defendant. )

CIVIL NO. SX-14-CV-287

ACTION FOR DAMAGES AND  
DECLARATORY JUDGMENT

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

Plaintiff, )

v. )

FATHI YUSUF, )

Defendant. )

CIVIL NO. SX-14-CV-278

ACTION FOR DEBT AND  
CONVERSION

<b>FATHI YUSUF and</b>	)	
<b>UNITED CORPORATION,</b>	)	
	)	
Plaintiffs,	)	<b>CIVIL NO. ST-17-CV-384</b>
	)	
v.	)	<b>ACTION TO SET ASIDE</b>
	)	<b>FRAUDULENT TRANSFERS</b>
<b>THE ESTATE OF MOHAMMAD HAMED,</b>	)	
<b>WALEED HAMED,</b> as Executor of the Estate of	)	
Mohammad Hamed, and <b>THE MOHAMMAD A.</b>	)	
<b>HAMED LIVING TRUST,</b>	)	
	)	
Defendants.	)	
_____	)	
<b>KAC357, INC.,</b>	)	
	)	
Plaintiff,	)	<b>CASE NO.: SX-18-CV-219</b>
	)	
v.	)	<b>ACTION FOR DEBT AND</b>
	)	<b>UNJUST ENRICHMENT</b>
<b>FATHI YUSUF,</b> a partner, and	)	
<b>THE HAMED-YUSUF PARTNERSHIP</b>	)	
a/k/a <b>THE PLAZA EXTRA SUPERMARKET</b>	)	
<b>PARTNERSHIP,</b>	)	
	)	
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:



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 motion to be served upon the following via the Case Anywhere docketing system:

**Hon. Edgar Ross**

Special Master  
edgarrossjudge@hotmail.com

**Gregory H. Hodges**

**Stefan Herpel**

**Charlotte Perrell**

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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).



**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,

v.

**FATHI YUSUF** and **UNITED CORPORATION**,  
  
Defendants/Counterclaimants,

v.

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

**CIVIL NO. SX-12-CV-370**

**ACTION FOR INJUNCTIVE  
RELIEF, DECLARATORY  
JUDGMENT, AND  
PARTNERSHIP DISSOLUTION,  
WIND UP, AND ACCOUNTING**

**Consolidated With**

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

v.

**UNITED CORPORATION**,  
  
Defendant.

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

**ACTION FOR DAMAGES AND  
DECLARATORY JUDGMENT**

---

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

v.

**FATHI YUSUF**,  
  
Defendant.

**CIVIL NO. SX-14-CV-278**

**ACTION FOR DEBT AND  
CONVERSION**



**WHEREAS**, 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;

**NOW, THEREFORE**, the parties agree as follows:


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,

**DATED:** August 22, 2018

By:

  
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**DUDLEY, TOPPER AND FEUERZEIG, LLP**

**DATED:** August 21, 2018

By:



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Attorneys for Defendants



**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, )

v. )

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

Defendants/Counterclaimants, )

v. )

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

Additional Counterclaim Defendants. )

**CIVIL NO. SX-12-CV-370**

**ACTION FOR INJUNCTIVE  
RELIEF, DECLARATORY  
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PARTNERSHIP DISSOLUTION,  
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**WALEED HAMED**, as Executor of the )  
Estate of **MOHAMMAD HAMED**, )

Plaintiff, )

v. )

**UNITED CORPORATION**, )

Defendant. )

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

**ACTION FOR DAMAGES AND  
DECLARATORY JUDGMENT**

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

Plaintiff, )

v. )

**FATHI YUSUF**, )

Defendant. )

**CIVIL NO. SX-14-CV-278**

**ACTION FOR DEBT AND  
CONVERSION**

\_\_\_\_\_)  
**FATHI YUSUF and**  
**UNITED CORPORATION,**

Plaintiffs,

v.

**THE ESTATE OF MOHAMMAD HAMED,**  
**WALEED HAMED,** as Executor of the Estate of  
Mohammad Hamed, and **THE MOHAMMAD A.**  
**HAMED LIVING TRUST,**

Defendants.  
\_\_\_\_\_)

**CIVIL NO. ST-17-CV-384**

**ACTION TO SET ASIDE  
FRAUDULENT TRANSFERS**

\_\_\_\_\_)  
**KAC357, INC.,** a USVI Corporation,

Plaintiff,

v.

**FATHI YUSUF,** a partner, and  
**THE HAMED-YUSUF PARTNERSHIP**  
a/k/a **THE PLAZA EXTRA SUPERMARKET**  
**PARTNERSHIP,**

Defendants.  
\_\_\_\_\_)

**CASE NO.: SX-18-CV-219**

**ACTION FOR DEBT AND  
UNJUST ENRICHMENT**

**ORDER**

The Court having read the stipulation submitted by the parties relating to case no. SX 18-CV-219, one of the consolidated cases in this action, and being otherwise fully advised in the premises,

**IT IS HEREBY ORDERED** that KAC357, Inc.'s claims that were previously included in Hamed's Revised Claims are deemed re-presented against the partnership for resolution by Master Ross in a manner identical with all other Hamed Revised Claims; and

**IT IS FURTHER ORDERED** that Defendants need not answer this Complaint, and instead KAC357 and Yusuf will henceforth file any necessary pleadings concerning KAC357's claims against the partnership in the proceedings before Master Ross.

**DATED:** August \_\_\_\_, 2018

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**DOUGLAS A. BRADY**  
Judge of the Superior Court

**A T T E S T:**

**Estrella H. George**  
Clerk of the Court

By: \_\_\_\_\_  
Deputy Clerk