

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

MOHAMMAD HAMED, <i>by his authorized</i>)	
<i>agent</i> WALEED HAMED,)	
)	CIVIL NO. SX-12-CV-99
Plaintiff,)	
v.)	
)	ACTION FOR DAMAGES,
FATHI YUSUF and UNITED CORPORATION,)	INJUNCTIVE AND
)	DECLARATORY RELIEF
Defendants.)	JURY TRIAL DEMANDED
_____)	

PLAINTIFF'S SUPPLEMENTATION OF TRO MOTION

In the plaintiff's October 22nd TRO reply memorandum (DE 18), it was pointed out that the defendants were still sending rent notices to the plaintiff regarding the Plaza Supermarket store located in Sion Farm ("Plaza East"). This point was made to demonstrate that United does not own this store, despite the defendants' assertions to the contrary. In short, United is only the landlord of the Plaza East store, not the owner. Notwithstanding this point made in the October 22nd reply, on November 1, 2012, the defendants sent a new rent notice to the plaintiff at the Plaza Extra Supermarket, again admitting that United does not own this store, a copy of which is attached as Exhibit A.

Dated: November 5, 2012

Is/Joel H. Holt, Esq.
Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820

Dated: November 5, 2012

Is/Carl J. Hartmann, III, Esq.
Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Estate Coakley Bay, L-6
Christiansted, VI 00820

Plaintiff's Notice of Filing
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CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of November, 2012, I filed the foregoing with the Clerk of the Court, and delivered by ECF to the following:

Joseph A. DiRuzzo, III
Fuerst Ittleman David & Joseph, PL
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/s/ Joel H. Holt

EXHIBIT A

UNITED CORPORATION
4C & 4D Sion Farm
St Croix, USVI 00821
Phone (340) 778-6240

November 1, 2012

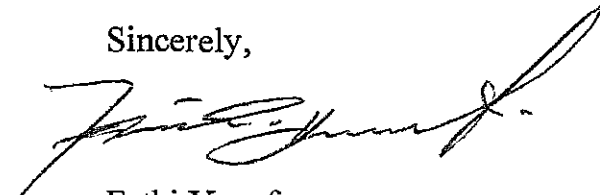
Mohammad Abdul Qader Hamed
Plaza Extra Supermarket
4-C & 4-D Estate Sion Farm
Christiansted, VI 00821

Statement of Rent due for Plaza Extra – East as of November 1, 2012

Rent due for Plaza Extra – East, January 1, 2012 through Oct. 31, 2012	Balance Due	\$2,440,295.90
ADD: 1% interest on outstanding Balance		<u>\$ 24,402.96</u>
	Amount Due	\$2,464,698.86
November 2012 Rent currently due:		<u>\$250,000.00</u>
	Total Balance due November 1, 2012	<u>\$2,714,698.86</u>

Please forward a check immediately.

Sincerely,



Fathi Yusuf

