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

**DIVISION OF ST. CROIX**

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| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2012-CV-370** |
| *Plaintiff/Counterclaim Defendant*, |  |
| vs.  **FATHI YUSUF** and **UNITED CORPORATION** | **ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF** |
|  |  |
| *Defendants and Counterclaimants*.  vs.  **WALEED HAMED, WAHEED** **HAMED, MUFEED HAMED, HISHAM HAMED,** **and PLESSEN ENTERPRISES, INC.**,  *Counterclaim Defendants*, | JURY TRIAL DEMANDED |
|  | Consolidated with |
| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, *Plaintiff,*  vs. | **Case No.: SX-2014-CV-287** |
| **UNITED CORPORATION,** *Defendant.* |  |
| *­­­­­­*­­  **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, *Plaintiff*    vs.    **FATHI YUSUF**, *Defendant.* | Consolidated with  **Case No.: SX-2014-CV-278** |
| *­­­­­­*­­  **FATHI YUSUF**, *Plaintiff*,  vs.  **MOHAMMAD A. HAMED TRUST***, et al,*  *Defendants.* | Consolidated with  **Case No.: ST-17-CV-384** |
|  |  |

**HAMED’S WITHDRAWAL OF ALL WRITTEN DISCOVERY, DEPOSITION NOTICES AND MOTIONS AS TO HIS CLAIM H-3: ATTORNEYS' FEES OF $504,591.03** **PAID WITH PARTNERSHIP FUNDS TO THE FUERST LAW FIRM IN 2012- 2013**

Hamed's *Revised Claim H-3* relates to $504,591.03 of Partnership funds that Yusuf paid to his personal lawyers (Fuerst Law Firm) from September 2012 to April 2013.

**1. Yusuf and United Have Conceded this Claim**

Attached as **Exhibit 1** is a stipulation. In it, Yusuf and United concede Hamed Revised Claim H-3 as follows:

Yusuf and United will concede the amount claimed by Hamed in H-3 ($504,591.03)

2. **Hamed withdraws all** **Written Discovery, Disposition Notices**

**and Motions With Regard To Claim H-3**

A. Hamed withdraws his outstanding deposition notices as to DTF, the Fuerst Firm, Christopher David, Joseph DiRuzzo.

B. Hamed withdraws all written discovery requests specifically designated as relating to his claim H-3.

B. Hamed withdraws all notices as to H-3 including any notices under Rule 37.1.

C. Hamed withdraws his outstanding motions:

i. Of May 23, 2018:

Hamed's motion for a determination of 'no-privilege' or to compel waiver or presumption as to Hamed's second motion regarding claim H-3: Yusuf's payments to the Fuerst law firm from Partnership funds.

ii. Od May 24, 2018:

Hamed's motion for limited, 60-day enlargement of time as to just the depositions of three out-of-state counsel regarding claim H-3.

**Dated:** May 30, 2018 A

**Carl J. Hartmann III, Esq.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of May, 2018, I served a copy of the foregoing by email and (CaseAnywhere), as agreed by the parties, on:

**Hon. Edgar Ross** (w/ 2 Mailed Copies)

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).

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