

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS/ST. JOHN**

UNITED CORPORATION,

Plaintiff,

v.

WAHEED HAMED,
(a/k/a Willy or Willie Hamed),

Defendant.

Case No.: ST-13-CV-101

**PLAINTIFF UNITED'S MOTION TO
STAY FILING OF RESPONSE TO
DEFENDANT'S BILL OF COSTS**

**PLAINTIFF UNITED'S MOTION TO STAY FILING OF RESPONSE TO
DEFENDANT'S BILL OF COSTS**

COMES NOW Plaintiff United Corporation, ("UNITED"), by its Counsel, and respectfully moves this honorable Court to stay the filing of Response to Defendant's September 17th, 2014 Bill of Costs for the following reasons:

1. On September 30th, 2014, Plaintiff United filed a Motion for Reconsideration of this Court's Order granting Summary Judgment and dismissing this matter with prejudice.
2. The Motion detailed the basis for the reconsideration, including Defendant's failure to disclose to the court material facts of such nature as to have resulted in a different outcome.
3. Because Plaintiff's Motion for Reconsideration is before the court, this matter remains pending. As such, Defendant's Bill of Cost is not ripe for consideration, and any response thereto may become moot if the Court grants Plaintiff's Motion.


4. As such, Plaintiff respectfully requests stay of the deadline for filing of Response to Defendant's Bill of Costs.

WHEREFORE, the Court should grant this Motion. A proposed Order is attached herewith.

Dated: October 3, 2014

Respectfully Submitted,
THE DEWOOD LAW FIRM
Counsel for Plaintiff

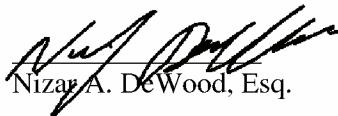
By: _____


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Email: dewoodlaw@gmail.com

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT a true and exact copy of the foregoing Motion to Stay Filing of Response and proposed Order were served via electronic mail on this 3rd day of October, 2014:

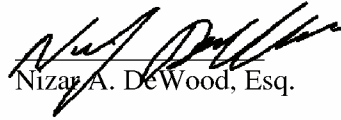
Carl J. Hartmann III, Esq.
5000 Estate Coakley Bay Unit L-6
Christiansted, USVI 00820
Email: carl@carlhartmann.com


Nizar A. DeWood, Esq.

AMENDED CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT a true and exact copy of the foregoing Motion to Stay Filing of Response and proposed Order were served via electronic mail on this 6th day of October, 2014:

Carl J. Hartmann III, Esq.
5000 Estate Coakley Bay Unit L-6
Christiansted, USVI 00820
Email: carl@carlhartmann.com


Nizar A. DeWood, Esq.

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ORDER

ORDER

Before the Court is Plaintiff Motion to Stay Filing of Response to Defendant's Bill of Costs; duly advised in the premises and for good cause shown it is hereby

ORDERED that the Motion is **GRANTED**;

ORDERED that any Response to Defendant's Bill of Costs is hereby **STAYED** until adjudication of Plaintiff's Motion for Reconsideration.

ORDERED that copies of this Order be served upon the parties of record.

ORDERED this ____ day of _____, 2014.

**HON. MICHAEL C. DUNSTON
SUPERIOR COURT JUDGE**

ATTEST

ESTRELLA GEORGE
ACTING CLERK OF THE COURT

BY: _____
Deputy Clerk