

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

MOHAMMAD HAMED By His Authorized Agent WALEED HAMED,)

Plaintiff,)

v.)

FATHI YUSUF and UNITED CORPORATION,)

Defendants.)


CIVIL NO. SX-12-CV- 370

ACTION FOR DAMAGES
INJUNCTIVE AND
DECLARATORY RELIEF
JURY TRIAL DEMANDED

NOTICE OF SUPPLEMENTATION OF THE PRELIMINARY INJUNCTION RECORD

The Plaintiff hereby gives notice of supplementing the exhibits already submitted into the preliminary injunction hearing by filing two new documents received (attached as Exhibit A) that supplement Plaintiff's Hearing Exhibits # 7 and 15.

Dated: March 18, 2013



Joel H. Holt, Esq.
Counsel for Plaintiff
2132 Company Street,
Christiansted, VI 00820
holtvi@aol.com
340-773-8709

Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Est. Coakley Bay, L6
Christiansted, VI 00820
Carl@carlhartmann.com
340-642-4422

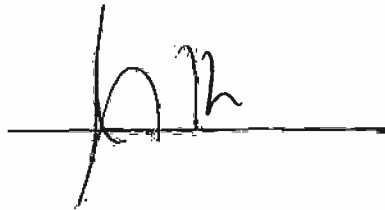
CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March, 2013, I served a copy of the foregoing Motion by hand on:

Nizar A. DeWood
The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820

And by email (jdruzso@fuerstlaw.com) and mail to:

Joseph A. DiRuzzo, III
Christopher David
Fuerst Ittleman David & Joseph, PL
1001 Brickell Bay Drive, 32nd. Fl.
Miami, FL 33131

A handwritten signature in black ink, appearing to read "JD", is written over a horizontal line.

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

| | | |
|--|---|-------------------------|
| MOHAMMAD HAMED by His Authorized Agent WALEED HAMED, |) | |
| |) | |
| <i>Plaintiff,</i> |) | CIVIL NO. SX-12-CV- 370 |
| v. |) | |
| |) | ACTION FOR DAMAGES |
| FATHI YUSUF and UNITED CORPORATION, |) | INJUNCTIVE AND |
| |) | DECLARATORY RELIEF |
| <i>Defendants.</i> |) | |
| |) | JURY TRIAL DEMANDED |

DECLARATION OF WALEED HAMED

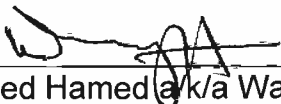
I, Walled Hamed a/k/a Wally Hamed, declare, pursuant to 28 U.S.C.

Section 1746, as follows:

1. I have personal knowledge of the facts set forth herein.
2. Attached hereto is another rent notice for March rent sent by United Corporation to Mohammad Hamed for the Plaza Extra supermarket at Sion Farm.
3. Attached hereto is one additional check drawn on the Plaza Extra Supermarket accounts to pay the defendants' counsel (Fuerst Ittleman David & Joseph, PL) that was not agreed to or authorized by my father, Mohammed Hamed, as follows:
 - Check 5005-\$82,274.87 dated March 6, 2013

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 18, 2013



Waleed Hamed a/k/a Wally Hamed

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

March 1, 2013

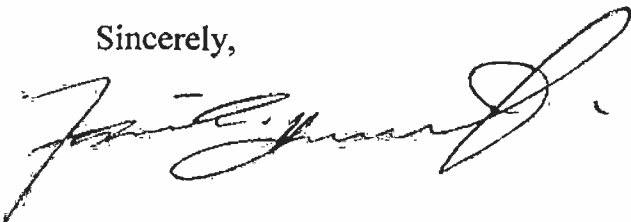
Mohammad Abdul Qader Hamed
Plaza Extra Supermarket
4-C & 4-D Estate Sion Farm
Christiansted, VI 00821

Statement of Rent due for Plaza Extra – East as of March 1, 2013

| | | |
|--|---------------------------------|------------------------------|
| Rent due for Plaza Extra – East January 1, 2012 through March 1, 2013 | Balance Due | \$3,554,481.95 |
| ADD: 1% interest on outstanding Balance | | \$ <u>35,544.82</u> |
| | Amount Due | \$3,590,026.77 |
| March 2013 Rent currently due: | | <u>\$250,000.00</u> |
| | Total Balance due March 1, 2013 | <u>\$3,840,026.77</u> |

Please forward a check immediately.

Sincerely,



Fathi Yusuf

UNITED CORPORATION
DBA PLAZA EXTRA
(340) 719-1870
PO BOX 3649
ST CROIX, VI 00851

BANCO POPULAR DE PUERTO RICO
101-667/216

5005
CHECK NUMBER
MICRONTOR

DATE
Mar 6, 2013

AMOUNT

\$ ****\$82,274.87

PAY Eighty-Two Thousand Two Hundred Seventy-Four and 87/100 Dollars
TO THE ORDER OF: FUERST ITTLEMAN DAVID & JOSEPH PL
1001 BRICKELL BAY DRIVE
32ND FLOOR
MIAMI, FL 33131

Memo:


AUTHORIZED SIGNATURE

⑈005005⑈ ⑆021606674⑆ 191⑈256269⑈

Details on Back

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