

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

MOHAMMAD HAMED By His Authorized Agent WALEED HAMED,)	
)	
Plaintiff,)	CIVIL NO. SX-12-CV- 370
V:)	
)	
FATHI YUSUF and UNITED CORPORATION,)	ACTION FOR DAMAGES
)	INJUNCTIVE AND
Defendants.)	DECLARATORY RELIEF
)	JURY TRIAL DEMANDED

**NOTICE OF SUPPLEMENTATION OF RECORD RE
MOTIONS FILED AFTER THE PRELIMINARY INJUNCTION WAS ENTERED**

The Plaintiff hereby gives notice of supplementing the record re the motions filed after the entry of the preliminary injunction with the following documents (listed in chronological order):

- 1) Email re notice of Mohammad Hamed filing tax returns (Exhibit 1).
- 2) New claim for additional back rent from United (landlord) to Plaza Extra (tenant) dating back to 1994 (Exhibit 2).
- 3) Directive from Yusuf (Plaza Extra letterhead) re no hiring of new employees (Exhibit 3).
- 4) Request For Clarification from Willie Hamed re Yusuf memo (Exhibit 4).

Dated: May 24, 2013



Joel H. Holt, Esq.
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340-773-8709

Carl J. Hartmann III, Esq.
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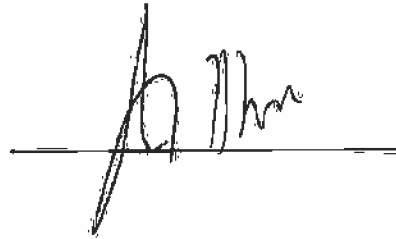
CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of May, 2013, I served a copy of the foregoing Notice by hand on:

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

And by email (jdiruzzo@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 "J. DiRuzzo", is written over a horizontal line. The signature is stylized and cursive.

From: Joel Holt <holtvi@aol.com>

To: jdiruzzo <jdiruzzo@fuerstlaw.com>; dewoodlaw <dewoodlaw@gmail.com>; cdauid <cdauid@fuerstlaw.com>; kglenda <kglenda@cameronlawvi.com>

Bcc: carl <carl@carlhartmann.com>; kimjapinga <kimjapinga@gmail.com>; wallyhstx <wallyhstx@yahoo.com>; williemhamed <williemhamed@yahoo.com>; mafihamed <mafihamed@hotmail.com>; shawnhamed <shawnhamed@live.com>

Subject: Mohammad Hamed

Date: Thu, May 16, 2013 2:59 pm

Counsel-I want to let you know that my client, Mohammad Hamed, filed all of his previously un-filed tax returns today under the current VI program "Operation Last Chance" with the IRB, reporting 50% of the net income from the three Plaza Extra supermarkets as his income. The IRB was provided with a copy of Judge Brady's opinion (we had previously provided them with other documents as well). I have repeatedly questioned why you have allowed your clients to file tax returns claiming 100% of this income as their income. I would hope you would correct those filings to be consistent with what you and your clients have repeatedly told the Court--that my client is entitled to 50% of this net income. Please let me know if you have any questions.

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BY: FIRST CLASS MAIL & EMAIL ONLY

May 17, 2013

Joel Holt, Esq.
2132 Company Street
Christiansted, VI 00820


Re: Rent Due – Plaza Extra – East Operations

Dear Attorney Holt,

On behalf of United Corporation, the following is a notice of the value of rents due as follows:

Rent due for Plaza Extra – East		
Bay No. 1 January 1, 1994 through April 4, 2004		
69,680 SQ. FT. at \$5.55 10 years and 95 days	Balance Due	\$3,967,894.19
Bay No. 5 May 1, 1994 through October 31, 2001		
3,125 SQ. FT. at \$12.00 6 years and 184 days	Balance Due	\$243,904.00
Bay No. 8 April 1, 2008 through May 30, 2013		
6,250 SQ. FT. at \$12.00 5 years and one month	Balance Due	\$381,250.00
Total Amount Due		<u>\$4,593,048.19</u>

These amounts are undisputed, and have been outstanding for a very long time - before 2012. This amount does not reflect the rent increase requested and noticed to Mohammed Hamed since January 1, 2012. We reserve our client’s right for the additional rents due and owing based on the rent increase after January 1, 2012. Kindly review the amount with your client, and advise when a check can be issued. Thank you.

Sincerely,

Nizar A. DeWood, Esq.



UNITED CORPORATION ^{DBA}

PLAZA EXTRA

U. S. VIRGIN ISLANDS

PHONE: 340-719-1870

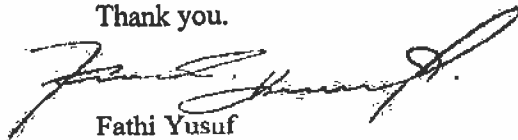
FAX: 340-719-1874

Date: May 21, 2013

To All:

Please note that there will be no new hiring of any family members. This applies to all members of the Yusuf and Hamed family. No wages, salaries, stipends or any kind of payment will be paid to any new hires.

Thank you.



Fathi Yusuf

Secretary & Treasurer





PLAZA EXTRA
U. S. VIRGIN ISLANDS
PHONE: 340-775-5646 FAX 340-775-5766

May 22, 2013

Dear Fathi Yusuf:

You sent a letter yesterday that ended by saying "No wages, salaries, stipends or any kind of payment will be paid to any new hires." Did you mean to say that Plaza Extra will not hire anyone else in the future? Please clarify.



Willie Hamed

Father's representative

