

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

MOHAMMAD HAMED, by his authorized	)	
Agent WALEED HAMED,	)	Case No.: SX-12-CV-370
	)	
Plaintiff,	)	ACTION FOR DAMAGES,
	)	INJUNCTIVE, AND
v.	)	DECLARATORY RELIEF
	)	
FATHI YUSUF and UNITED CORPORATION,	)	<b><u>JURY TRIAL DEMANDED</u></b>
	)	
Defendants.	)	
	)	
	)	
	)	
_____	)	

**MOTION TO VACATE INJUNCTION PENDING  
POSTING OF ADDITIONAL SECURITY**

Defendants, through their undersigned counsel, respectfully move this Court, pursuant to Fed. R. Civ. P. 65(c), to vacate this Court’s injunction, as set forth in its order dated April 25, 2013, pending the posting of a cash bond, a bond countersigned by a qualified surety or secured by unencumbered property of a value equal to at least \$22 million and providing Defendants with such further relief as is just and proper under the circumstances.

In support of this motion, Defendants respectfully refer this Court to the accompanying memorandum.

**DUDLEY, TOPPER and FEUERZEIG, LLP**

Dated: November 15, 2013

By: /s/ G. Hodges  
Gregory H. Hodges (V.I. Bar No. 174)  
1000 Frederiksberg Gade - P.O. Box 756  
St. Thomas, VI 00804  
Telephone: (340) 715-4405  
Telefax: (340) 715-4400  
E-mail:[ghodges@dtflaw.com](mailto:ghodges@dtflaw.com)

and

Nizar A. DeWood, Esq. (V.I. Bar No. 1177)  
The DeWood Law Firm  
2006 Eastern Suburbs, Suite 101  
Christiansted, VI 00830  
Telephone: (340) 773-3444  
Telefax: (888) 398-8428  
Email: [info@dewood-law.com](mailto:info@dewood-law.com)

Attorneys for Fathi Yusuf and United Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of November, 2013, I caused the foregoing **MOTION TO VACATE INJUNCTION PENDING POSTING OF ADDITIONAL SECURITY** to be served upon the following via e-mail:

Joel H. Holt, Esq.  
**LAW OFFICES OF JOEL H. HOLT**  
2132 Company Street  
Christiansted, V.I. 00820  
Email: [holtvi@aol.com](mailto:holtvi@aol.com)

Carl Hartmann, III, Esq.  
5000 Estate Coakley Bay, #L-6  
Christiansted, VI 00820  
Email: [carl@carlhartmann.com](mailto:carl@carlhartmann.com)

*/s/ N. DeWood*

---