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

## MOHAMMAD HAMED by His Authorized Agent WALEED HAMED,

Plaintiff,

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FATHI YUSUF and UNITED CORPORATION, )

Defendants.

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES INJUNCTIVE AND DECLARATORY RELIEF

JURY TRIAL DEMANDED

## PLAINTIFF HAMED'S OPPOSITION TO DEFENDANTS' "EMERGENCY MOTION" RE BOND

Plaintiff Hamed, by and through its undersigned counsel, opposes the "Emergency Motion" filed by Defendants on December 16, 2013. Interestingly, Defendants chose to file this "emergency motion" without first responding to Plaintiff's pending motion to partially reconsider/clarify the Bond Order.<sup>1</sup> In any event, for the reasons set forth herein, Plaintiff respectfully submits that this "emergency motion" be denied until this Court can address the December 16<sup>th</sup> motion for reconsideration.

## I. A Request to Post Non-Cash Security Is Normal, Allowed in this Jurisdiction and not a Refusal to Post Bond

The posting of a non-cash bond consisting of property is common in this jurisdiction, as has been noted very recently by the Supreme Court of the Virgin Islands, the Appellate Division of the District Court and the District Court itself. Most importantly, in *First Am. Dev. Group v. WESTLB, et al.*, 2012 WL 1526100 at \*5 (D.V.I. April 30,

<sup>&</sup>lt;sup>1</sup> As noted in that motion, it was filed 3 days after the receipt of the Bond Order. See Exhibit 1 to Plaintiff's December 13<sup>th</sup> motion. Hence, it can hardly be said that Plaintiff is not diligently paying attention to this Court's Bond Order. Indeed, since the filing of that motion, Plaintiff has been obtaining title reports to demonstrate that the real property being offered as collateral is free and clear of any liens.

2012), the Supreme Court of the Virgin Islands approved the filing of real property as security for a bond (in a case where Defendants' counsel was counsel in that case as well), holding in part:

Consequently, if First American wishes to effectuate the stay of the execution of the Superior Court's August 24, 2011 Judgment, it must post a bond countersigned by a qualified surety or **secured by unencumbered property of a value equal to or greater than the bond** with the Superior Court . . . . (Emphasis added).

*See also, Milligan v. Khodra,* 46 VI 305, 2004 WL 3383654 at \*10 (D.V.I. App. Div. 2004)("bond can be cash, property or surety bond"); *Marrero v. United Indus., Serv. Transp., Prof'l & Gov't Workers of N. Am.,* 2012 WL 2865970 at \*1 (D.V.I. July 12, 2012). ("Courts in this jurisdiction have permitted the posting of property bonds in lieu of a cash bond").<sup>2</sup>

Indeed, in remanding this case, the Supreme Court did not criticize this Court's use of other security in the form of escrowed profits, it simply held that these profits could not be used because of the encumbrance created by the TRO in the criminal case.

<sup>&</sup>lt;sup>2</sup> While these cases deal with a supersedeas bond under Rule 62(c), both Rule 62(c) and Rule 65(c) use the term "security" so this distinction is moot. *See e.g. Nichols v. Deutsche Bank Nat. Trust Co.*, CIV. 07CV2039-L NLS, 2007 WL 4181111 (S.D. Cal. Nov. 21, 2007):

As security pursuant to Rule 65(c) of the Federal Rules of Civil Procedure, the deed of trust shall remain on the Property as security for the payment of such costs and damages as may be incurred or suffered by any party who is found to have been wrongfully enjoined or restrained.

Thus, the request to clarify this Court's Bond Order is not novel or without merit. Moreover, in *Frank C. Pollara Grp., LLC v. Ocean View Inv. Holding*, 9-60, 2013 WL 5135690 (D.V.I. Sept. 13, 2013), the District Court, after noting it has discretion in the posting of security, just this year allowed real property to be posted as a bond, **using the amount of the tax assessment of the property as its value,** as proposed by Plaintiff here.

In short, there has been no refusal to post a bond as suggested by Defendants, simply clarification so the bond can be posted using unencumbered property.

#### II. The Amount of the Bond

Aside from the fact that Plaintiff has also requested a reduction in the bond of \$100,000 because Defendants have conceded they are no longer considering amending the Plea in the criminal case (upon which this \$100,000 figure was based), two additional points need to be noted.

First, in calculating the bond, this Court relied on the salaries of the managers as being \$347,000, which included \$61,000 in the annual bonus and vacation pay of each manager, which figures were submitted by Defendants. See ¶3 of Gaffney declaration attached as Exhibit 1 to Defendants' May 9<sup>th</sup> motion to amend bond. Using this figure, this Court found that half of this salary was the cost that would be needed to replace the four current Hamed managers. However, Defendants have now stated in writing that they will not pay this \$61,000 payment this year, which they have refused to rescind despite being told that this unilateral change violates the terms of the preliminary injunction. See **Exhibit A.** Thus, unless these bonuses and vacation pay are paid, the bond also needs be reduced accordingly since Defendants represented to this Court

## Plaintiff's Opposition to Emergency Motion Page 4

that this amount was part of each manager's current salary, which this Court then used to calculate the bond.<sup>3</sup>

Second, the bond includes \$695,000 to cover one-half of the four Hamed salaries going forward. At the very least, Plaintiff should be given the option of having his four sons forego this portion of their salaries if this Court choses not to accept a property bond, as no bond is needed to secure this amount (\$695,000) if this portion of their salaries is not actually being paid going forward.

It is respectfully submitted that this Court should dutifully consider all of these issues—the posting of property, the reduction in the amount required where appropriate and the alternatives that exist regarding the amount of the bond—before granting the drastic remedy of dissolving an injunction that has been in place for almost eight months without incident. Indeed, Defendants did not even address the bond issue for over six weeks after the Supreme Court's September 30<sup>th</sup> ruling, confirming this is not as much of an urgent issue as a tactical one to try to change the status quo without regard to the merits of the case.

<sup>&</sup>lt;sup>3</sup> In its motion to reconsider/clarify the bond, Plaintiff proposed to use this sum--four times \$61,000 less taxes, or approximately \$200,000--as part of the bond in this case, so a reduction of \$200,000 would be an appropriate reduction to deal with this issue. It would also moot the need to file a motion addressing this issue if the payment is not made, as these payments have been paid on a regular basis well before the injunction was entered, as noted in the attached summary documents. See Exhibit B. Indeed, that is why Gaffney listed this amount as part of the manager's regular salary.

## III. Conclusion

Clearly the "emergency motion" is designed to prevent this Court from being able to carefully consider the motion to reconsider/clarify the Bond Order, including alternative solutions that will secure Defendants as required by Rule 65(c), while allowing the status quo to continue while the case proceeds on the merits. Indeed, \$795,000 of the required \$1,200,000 (the \$100,000 no longer needed in the criminal case and the \$695,000 in future salaries) has still not been incurred. As such, it is respectfully submitted that Defendants' emergency motion should be denied, as the motion to reconsider/clarify will result in an adequate bond being timely posted.

Dated: December 23, 2013

Joer H. Holt, Esq. Coursel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street, Christiansted, VI 00820 Email: holtvi@aol.com Tele: (340) 773-8709 Fax: (340) 773-8677

#### Carl J. Hartmann III, Esq.

Co-Counsel for Plaintiff 5000 Estate Coakley Bay, Unit L-6 Christiansted, VI 00820 Email: carl@carlhartmann.com Tele: (340) 719-8941 Plaintiff's Opposition to Emergency Motion Page 6

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this  $23^{rd}$  day of December, 2013, I served a copy of the foregoing in compliance with the parties consent, pursuant to Fed. R. Civ. P. 5(b)(2)(E), to electronic service of all documents in this action on the following persons:

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

Gregory H. Hodges VI Bar No. 174 Law House, 10000 Frederiksberg Gade P.O. Box 756 ST. Thomas, VI 00802 ghodges@dtflaw.com

MARA

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

MOHAMMAD HAMED,

Plaintiff,

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FATHI YUSUF and UNITED CORPORATION,

Defendants.

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES, INJUNCTIVE AND DECLARATORY RELIEF

JURY TRIAL DEMANDED

## DECLARATION OF JOEL H. HOLT

I, Joel H. Holt, declare, pursuant to 28 U.S.C. Section 1746, as follows:

- 1. I am counsel of record for the Plaintiff and have personal knowledge of the foregoing facts.
- 2. Fathi Yusuf sent a memo, a copy of which is attached, stating that no vacation pay or bonuses will be paid this year.
- 3. Plaintiff believes this decision violates the April 25<sup>th</sup> Preliminary Injunction Order, which provides that no unilateral action may be taken that affects the operations of the three Plaza Extra Supermarket stores as they have been operated prior to this commencement of this litigation. In this regard, these bonuses and vacation pay have been considered part of the regular salary of the seven Yusuf and Hamed managers, as noted in ¶3 of Gaffney's declaration submitted to this Court by Defendants in support of their May 9<sup>th</sup> motion to amend the bond.
- 4. However, when asked to reconsider this directive that no bonuses or vacation be paid, Defendants' counsel, Nizar DeWood, stated that these bonuses and vacation pay would not be paid.

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

Dated: December 23, 2103

8	EXHIBIT	
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## PLAZ EXTRA EAST



## PLAZA EXTRA (EAST) BONUS 2010

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WADDA E. CHARRIEZ	<b>OFFICE MANAGER</b>	\$4,500.00
MARY S. GONZALEZ	ACCOUNTS PAYABLE	\$3,000.00
LAVEINA BARTLETTE	ASST. ACCOUNT PAYABLES	\$1,000.00
JACEIVER BARTLETTE	RECEIVABLE	\$500.00
ALBERTO MALDONADO	GROCERY MANAGER	\$2,000.00
MICHAELINA HENRY	FLOOR MANAGER	\$4,500.00
FATHI HANNUN	PRODUCE MANAGER	\$2,000.00
CHRITUS THEOPHILUS	WAREHOUSE	\$2,500.00
CLARIS JOSEPH	RECEIVING	\$1,000.00
RAYMOND WILLIAMS	DAIRY MANAGER	\$3,500.00
FUAD MAHMOUD	SECURITY	\$3,000.00
JUAN CONCEPCION	SECURITY	\$7,000.00
	MEAT MANAGER	\$9,000.00
JOAQUIN ORTIZ	MEAT CLERK	\$1,000.00
MANUELA LIMA	GENERAL MANAGER	\$50,000.00 4
WALLY HAMED		\$50,000.00
MUFEED HAMED	MANAGER	\$50,000.00
YUSUF YUSUF	MANAGER	\$250.00
MONICA LLOYD	DELI-BAK MANAGER	
GERRY SEERAM	PRODUCE ASST.	\$2,000.00
NEALYSA ARMSTRONG	COMPUTER ROOM	\$500.00
REUEL SALTERS	FROZEN MANAGER	\$2,000.00

TOTAL

\$199,250.00

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## PLAZA EXTRA (EAST) BONUS 2011

WADDA E. CHARRIEZ LAVEINA BARTLETTE MARY S. GONZALEZ JACEIVER BARTLETTE ALBERTO MALDONADO MICHAELINA HENRY FATHI HANNUN CHRISTUS THEOPHILUS CLARIS JOSEPH **RAYMOND WILLIAMS** FUAD MAHMOUD JUAN CONCEPCION JOAQUIN ORTIZ WALLY HAMED MUFEED HAMED YUSUF YUSUF MONICA LLOYD GERRY SEERAM NEALYSA ARMSTRONG **REUEL SALTERS TROY WILLIAMS** 

**OFFICE MANAGER** OFFICE ASST. ACCOUNTS PAYABLE RECEIVABLE GROCERY MANAGER FLOOR MANAGER WAREHOUSE MANAGER WAREHOUSE RECEIVING DAIRY MANAGER SECURITY SECURITY MEAT MANAGER GENERAL MANAGER MANAGER MANAGER DELI-BAK MANAGER PRODUCE ASST. COMPUTER ROOM FROZEN MANAGER VALUE PACK

1000.00 3,000.00 750.00 2,000.00 4,500.00 2,000.00 2,500.00 1,000.00 3,500.00 3,000.00 7,000.00 9,000.00 50,000.00 50,000.00 € 50.000.00 500.00 2,000.00 500.00 2,000.00 1000.00

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#### TOTAL 199,750.00

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## PLAZA EXTRA (EAST) BONUS 2012

WADDA E. CHARRIEZ	OFFICE MANAGER	4500.00
LAVEINA BARTLETTE	OFFICE ASST.	1000.00
MARY S. GONZALEZ	ACCOUNTS PAYABLE	3,000.00
SABRINA MOTILAL	RECEIVABLE	500.00
ALBERTO MALDONADO	GROCERY MANAGER	2,000.00
MICHAELINA HENRY	FLOOR MANAGER	4,500.00
FATHI HANNUN	WAREHOUSE MANAGER	2,000.00
CHRISTUS THEOPHILUS	WAREHOUSE	2,500.00
CLARIS JOSEPH	RECEIVING	1,000.00
RAYMOND WILLIAMS	DAIRY MANAGER	3,500.00
FUAD MAHMOUD	SECURITY	3,000.00
JUAN CONCEPCION	SECURITY	7,000.00
JOAQUIN ORTIZ	MEAT MANAGER	9,000.00
WALLY HAMED	GENERAL MANAGER	50,000.00
MUFEED HAMED	MANAGER	50,000.00
YUSUF YUSUF	MANAGER	50,000.00
MONICA LLOYD	DELI-BAK MANAGER	500.00
GERRY SEERAM	PRODUCE ASST.	2,000.00
REUEL SALTERS	FROZEN MANAGER	2,000.00
TROY WILLIAMS	VALUE PACK	1000.00
KIZMA PETERSEN	FRONT END	500.00
KATISHA KING	ASST. FLOOR/FRONT	500.00

TOTAL 200,000.00

## PLAZ EXTRA WEST

### Plaza Extra West Bonus 2010

Name Khalil Ahmad Myra Senhouse Veronica Cruz Clara Modeste Lissette Lima Salomon Laurencin Juan Ledèsma Orlando Garcia Patricia Martin Iris Osorio Karen Quinn Virgilio Henriquez Abdelkrem Boucenna Victor Petersen Trevor Sabion Marva Samson Kenia Walcott Maher Yusuf **Hisham Hamed** Marian James Mary JnBaptiste **Raymond Davis** 

Position Warehouse Manager Office Clerk Office Clerk Office Clerk Office Clerk Meat Manager Asst. Meat Manager Frozen Meat Clerk Meat Clerk Computer Room Manager Produce Manager Grocery Manager Grocery Floor Manager Dell Manager Asst. Deli Manager **General Manager** Asst. General Manager Grocery Clerk Grocery Clerk **Dairy Manager** 

Amount \$6,000.00 \$3,500.00 \$600.00 \$2,000.00 \$3,500.00 \$8,000.00 \$3,500.00 \$1,500.00 \$800.00 \$750.00 \$3,000.00 \$2,000.00 \$20,000.00 \$1,500.00 \$3,000.00 \$750.00 \$500.00 \$50,000.00 2 \$50,000.00 E \$1,500.00 \$800.00 \$2,000.00

Total

\$165,200.00

#### Plaza Extra West Bonus 2011

Name Khalil Ahmad Myra Senhouse Veronica Cruz Clara Modeste Lissette Lima Salomon Laurencin Juan Ledesma Orlando Garcia Iris Osorio Karen Quinn Abdelkrem Boucenna Trevor Sabion Marva Samson Maher Yusuf Hisham Hamed Marian James Mary JnBaptiste Jess Isale

Position Warehouse Manager Office Clerk Office Clerk Office Clerk Office Clerk Meat Manager Asst. Meat Manager Frozen Meat Clerk Computer Room Manager Grocery Manager Floor Manager Deli Manager **General Manager** Asst. General Manager Grocery Clerk Grocery Clerk Warehouse Assistant

Total

\$163,400.00

Amount

\$6,000.00

\$3,500.00

\$600:00

\$2,000.00

\$3,500.00

\$8,000.00

\$3,500.00

\$1,600.00

\$750:00

\$3,000.00

\$24,000.00

\$3,000.00

\$750.00

\$1,500.00

\$800.00

\$1,000.00

\$50,000.00 🛩

\$50,000.00

#### Plaza Extra West Bonus 2012

Name Khalil Ahmad Myra Senhouse Veronica Cruz **Clara Modeste** Lissette Lima Salomon Laurencin Juan Ledesma Orlando Garcia Iris Osorio Karen Quinn Abdelkrem Boucenna **Trevor Sabion** Marva Samson Maher Yusuf **Hisham Hamed** Marian James Mary JnBaptiste Jess Isaie Alfredo Nieves'

Position Warehouse Manager **Office Clerk** Office Clerk Office Clerk Office Clerk Meat Manager Asst. Meat Manager Frozen Meat Clerk Computer Room Manager Grocery Manager Floor Manager Deli Manager General Manager Asst. General Manager **Grocery Clerk** Grocery Clerk Warehouse Assistant Produce Manager

Total

\$165,400.00

Amount

\$6,000.00

\$3,500.00

\$600.00

\$2,000.00

\$3,500.00

\$8,000.00

\$3,500.00

\$1,500.00

\$750.00

\$3,000.00

\$24,000.00

\$3,000.00

\$750.00

\$50,000.00

\$1,500.00

\$800.00

\$1,000.00

\$2,000.00

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Employee ID Employee Masked SS No Reference Date	Pay Type Pay	Pay Hr Pay Amt	Amount	Gross MedicalIns Garnishment Soc_Sec_ER MedicalIns_	Fed_Income EmplLoan MASA Medicare_ER	Soc_Sec ChildCare CashDrawer FUTA_ER	Medicare HigherEduc AFLAC SUI_ER	
580083688 RICHARDS, CHERYL XXX-XX-3688 141769 12/31/10	Salary	750.00	596.11	750.00 -46.50	-96.51 -10.88	-46.50	-10.83	
580089201 FREYLINGER, GERAR XXX-XX-9201 141770 12/31/10	Salary	9,000.00	5,784.66	9,000.00 -558.00	-2,526.84 -130.50	-558.00	-130.50	
580091013 YUSUF, FATHI XXX-XX-1013 141771 12/31/10	Salary	50,000.00	32,521.00	50,000.00	-16,754.00 -725.00		-725.00 2	
580139068 HAMED, WAHEED M. XXX-XX-9068 141772 12/31/10	Salary	50,000.00	32,594.70	50,000.00	-16,680.30 -725.00		-725.00	
580151861 INDUSTRIOUS, JUDIT XXX-XX-1861 141773 12/31/10	Salary	400.00	341.59	400.00	-27.81	-24.80	-5.80	
580161493 JACKSON, MAUREEN XXX-XX-1493 141774 12/31/10	Salary	400.00	341.59	400.00	-27.81 -5.80	-24.80	-5.80	
580168521 BRATHWAITE, CARIN XXX-XX-8521 141775 12/31/10	Salary	300.00	272.72	300.00 -18.60	-4.33 -4.35	-18.60	4.35	

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580169216 LAKE-KING, JENNIFER XXX-XX-9216 141776 12/31/10	Salary	125.00	100.44	125.00 -7.75	-15.00 -1.81	-7.75	-1.81	
580169659 MADURO, JULIA XXX-XX-9659 141777 12/31/10	Salary	500.00	440.00	500.00 -31.00	-21.75 -7.25	-31.00	-7.25	
580175988 GUMBS, WENTWORT XXX-X5988 141778 12/31/10	Salary	17,000.00	10,291.50	17,000.00 -1,054.00	-5,408.00 -246.50	-1,054.00	-246.50	
580253840 YUSUF, NAJEH F. XXX-XX-3840 141779 12/31/10	Salary	50,000.00	32,521.00	50,000.00	-16,754.00 -725.00		-725.00	
580339392 DE LA ROSA CASTILL XXX-XX-9392 141780 12/31/10	Salary	2,500.00	1,903.50	2,500.00 -155.00	-405.25 -36.25	-155.00	-36.25	
580358101 MAHD, MA'MOUN F. XXX-XX-8101 141781 12/31/10	Salary	3,000.00	2,101.82	3,000.00 -186.00	-668.68 -43.50	-186.00	-43.50	
580372698 ESPRIT, LINDA L. XXX-XX-2698 141782 12/31/10	Salary	100.00	67.73	100.00 -6.20	-20.00 -4.62 -1.45	-6.20	-1.45	

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580067334 JOSEPH BLYDEN, CH XXX-XX-7334 151102 12/30/11	Regular	. Sile	250.00	235.87	250.00		-10.50 -15.50	-3.63 -3.63	
580068397 ABRAHAM, DIANE C. XXX-XX-8397 151103 12/30/11	Regular	4	150.00	117.56	150.00	-23.96	-6.30	-2.18 -2.18	
580071889 CASTRO, CARLOS XXX-XX-1889 151104 12/30/11	Regular		300.00	262.95	300.00	-20.10	-12.60 -18.60	-4.35	
580083204 BELL, ANTOINETTE E. XXX-XX-3204 151105 12/30/11	Regular	14	100.00	94.35	100.00		-4.20 -6.20	-1.45 -1.45	
580083688 RICHARDS, CHERYL XXX-XX-3688 151106 12/30/11	Regular		750.00	604.74	750.00	-102.88	-31.50 -46.50	-10.88 -10.88	
580089201 FREYLINGER, GERAR XXX-XX-9201 151107 12/30/11	Salary		0°.000.6	5,974.07	9,000.00	-2,517.43	-378.00	-130.50 -130.50	
580091013 YUSUF, FATHI XXX-XX-1013 151108 12/30/11	Salary		50,000.00	32,532.09	50,000.00	-16,742.91		-725.00	

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	Medicare HigherEduc AFLAC Medicare_ER	-725.00	-7.25 -7.25	-5.80	-1.81 -1.81	-7.25 -7.25	-7.25	-246.50
0,2011	Soc_Sec ChildCare CashDrawer Soc_Sec_ER MedicalIns_		-21.00	-16.80 -24.80	-5.25 -7.75	-21.00	-21.00	-714.00
011 to Dec 3	Fed_Income EmplLoan MASA PreTXCIGNA SULER	-16,668.20	-50.10	-24.42	-15.00			-5,474.69
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t order is by (	Pay Type	Salary	Regular	Regular	Regular	Regular	Regular	Salary
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# United Corporation\* Payroll Register For the Period From Dec 30, 2011 to Dec 30, 2011

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580212663 580212663 REDD, BRITTANY L. XXX-XX-2663 151116 12/30/11	Regular		150.00	137.67	150.00	-3.85	-6.30	-2.18	
580253840 YUSUF, NAJEH F. XXX-XX-3840 151117 12/30/11	Salary	. '	50,000.00	32,556.99	50,000.00	-16,718.01		-725.00	
580270349 CALLWOOD, KANEES XXX-XX-0349 151118 12/30/11	Regular	54 m = =	100.00	94.35	100.00		-4.20 -6.20	-1.45 -1.45	
580339392 DE LA ROSA CASTILL XXX-XX-9392 151119 12/30/11	Regular	n	3,000.00	2,302.32	3,000.00	-528.18	-126.00 -186.00	-43.50	
580358987 EUSEBE, ANDREW R. XXX-XX-8987 151120 12/30/11	Regular		250.00	222.02	250.00	-13.85	-10.50 -15.50	-3.63 -3.63	
580372698 ESPRIT, LINDA L. XXX-XX-2698 151121 12/30/11	Regular	-	125.00	79.48	125.00	-38.46	-5.25 -7.75	-1.81	
580373276 LEWIS, EDILIA XXX-XX-3276 151122 12/30/11	Regular		200.00	188.70	200.00		-8.40 -12.40	-2.90	

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United Co Pa For the Period Froi Filter Criteria includes: Report order is by Check Date. Report is printed in Detail Format.	nt order is by Che	FO ck Date. Report is p	United For the Period I	United Corporation - STT OLD Payroll Register Period From Dec 29, 2012 to Dec 29, 2012	- STT OLD ster 2012 to Dec 2	9, 2012	Pa	Page: 3
Employee ID Employee Masked SS No Reference Date	Pay Type Pa	Pay Hr Pay Amt	Amount	Gross Mędicalins Garnishment PreTxAFLÁC FUTA_ER	Fed_Income EmplLoan MASA PreTxCIGNA SUI_ER	Soc_Sec ChildCare CashDrawer Soc_Sec_ER	Medicare HigherEduc AFLAC Medicare_ER	
580169216 LAKE-KING, JENNIFER XXX-XX-9216 65182 12/29/12	Regular	125.00	00 102.94	125.00	-15.00	-5.25 -7.75	-1.81 -1.81	
580169659 MADURO, JULIA XXX-XX-9659 65183 12/29/12	Regular	500.00	00 444.20	500.00	-27.55 -2.50	-21.00 -31.00	-7.25 -7.25	
580170806 DORSET, KAREEMA XXX-XX-0806 65184 12/29/12	Regular	500.00	00 471.75	500.00		-21.00 -31.00	-7.25 -7.25	
580175988 GUMBS, WENTWORT XXX-XX-5988 65185 12/29/12	Salary	17,000.00	00 10,576.45	17,000.00	-5,463.05	-714.00 -1,054.00	-246.50 -246.50	
580253840 YUSUF, NAJEH F. XXX-XX-3840 65186 12/29/12	Salary	50,000.00	00 32,602.03	50,000.00	-16,672.97		-725.00	
580339392 DE LA ROSA CASTILL XXX-XX-9392 65187 12/29/12	Regular	3,000.00	00 2,308.67	3,000.00	-521.83	-126.00 -186.00	-43.50 -43.50	
580372698 ESPRIT, LINDA L. XXX-XX-2698 65188 12/29/12	Regular	125.00	00 99.57	125.00	-18.37 -0.63	-5.25 -7.75	-1.81 -1.81	

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Employee ID Employee Masked SS No Reference Date	Pay Type Pay Hr	Pay Amt	Amount	Gross Medicatins Garnishment PreTxAFLAC FUTA_ER	Fed_Income EmplLoan MASA PreTxCIGNA SUI_ER	Soc_Sec ChildCare CashDrawer Soc_Sec_ER	Medicare HigherEduc AFLAC Medicare_ER	
580071889 CASTRO, CARLOS XXX-XX-1889 65175 12/29/12	Regular	300.00	263.58	300.00	-19.47	-12.60 -18.60	-4.35	
580083688 RICHARDS, CHERYL XXX-XX-3688 65176 12/29/12	Regular	750.00	606.80	750.00	-100.82 -3 75	-31.50 -46.50	-10.88 -10.88	
580089201 FREYLINGER, GERAR XXX-XX-9201 65177 12/29/12	Salary	9,000.00	5,989.49	9,000.00	-2,502.01	-378.00 -558.00	-130.50 -130.50	
580091013 YUSUF, FATHI XXX-XX-1013 65178 12/29/12	Salary	50,000.00	32,550.87	50,000.00	-16,724,13		-725.00	
580139068 HAMED, WAHEED M. XXX-XX-9068 65179 12/29/12	Salary	50,000.00	32,627.61	50,000.00	-16,647.39		-725.00	
580161493 JACKSON, MAUREEN XXX-XX-1493 65180 12/29/12	Regular	500.00	422.28	500.00	-49.47	-21.00	-7.25 -7.25	
580168521 BRATHWAITE, CARIN XXX-XX-8521 65181 12/29/12	Regular	400.00	353.89	400.00	-23.51 -2.00	-16.80 -24.80	-5.80	

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