## IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX MOHAMMAD HAMED, Plaintiff, V. ACTION FOR DAMAGES, INJUNCTIVE AND DECLARATORY RELIEF FATHI YUSUF and UNITED CORPORATION, Defendants. JURY TRIAL DEMANDED

## CORRECTIVE DECLARATION OF CARL J. HARTMANN III

- I, Carl J. Hartmann III, declare, pursuant to 28 U.S.C. Section 1746, as follows:
- 1. I am co-counsel of record for the Plaintiff.
- 2. I filed a *Declaration* on January 22, 2014, as **Exhibit 4** in support of Plaintiff Hamed's Motion to Compel.
- 3. Due to an oversight, in paragraph 8 of my declaration, I stated that I had emailed or spoken with "John Gaffney" dozens and dozens of times in an effort to obtain the "live" accounting passwords, but that statement should have read that I emailed, wrote to or spoke with "John Gaffney or Nizar DeWood" dozens and dozens of times.

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

Dated: January 27, 2014

Carl J. Hartmann, III