


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.)	
)	ACTION FOR DAMAGES
FATHI YUSUF and UNITED CORPORATION,)	INJUNCTIVE AND
)	DECLARATORY RELIEF
Defendants.)	
)	JURY TRIAL DEMANDED

PLAINTIFF'S NOTICE OF FILING SUPPLEMENTAL DECLARATIONS RE MOTION TO COMPEL COMPLIANCE WITH PRELIMINARY INJUNCTION

The Plaintiff hereby files two supplemental declarations in support of his January 22nd Motion to Compel the Defendants to comply with the preliminary injunction, attached as Exhibits 1 and 2 hereto.

Dated: January 28, 2014



Joel H. Holt, Esq.
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carl@carlhartmann.com
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January, 2014, 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



Sent from my BlackBerry 10 smartphone.

From: Maggie Burke
Sent: Monday, January 27, 2014 6:19 PM
To: shawnhamed@yahoo.com
Cc: Yvette Clendenen
Subject: Re: Plaza Extra Account Access

**EXHIBIT
A**

Good day Shawn

The account administrator is Mike, I have forward your request to his attention.
Maggie Burke, MLO | Dual Role Manager

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Scotiabank | Commercial Banking
Post Office Box 420, St. Thomas, USVI, 00804

T: 340.715.9616 F: 340.777.9373
maggie.burke@scotiabank.com
scotiabank.com



shawnhamed@yahoo.com

01/27/2014 05:22 PM

To Yvette Clendenen <yvette.clendenen@scotiabank.com>
cc Maggie Burke <maggie.burke@scotiabank.com>
Subject Re: Plaza Extra Account Access

Thank you for your response. Who are the administrators on the accounts?

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Sent from my BlackBerry 10 smartphone.

From: Yvette Clendenen
Sent: Monday, January 27, 2014 4:46 PM
To: Hisham (Shawn) Hamed



Cc: Maggie Burke
Subject: Re: Fw: Plaza Extra Account Access

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Good Day Mr. Hamed,

In response to your email request below, the administrators on the account for On-line Banking are the ones that have to make the adjustments.









Regards,


 "Hisham \ (Shawn) Hamed" <shawnhamed@yahoo.com>

"Hisham \ (Shawn) Hamed" <shawnhamed@yahoo.com>

01/17/2014 12:22 PM

Please respond to
"Hisham \ (Shawn) Hamed" <shawnhamed@yahoo.com>

 
"yvette.clendenen@scotiabank.com"
<yvette.clendenen@scotiabank.com>
To
 
cc
 
Fw: Plaza Extra Account Access
Subject
 

Good day Mrs. Clendenen,

2

I am contacting you because I still have limited access to the Plaza Extra accounts. The one account that I do have access to, account # *****2918, is also limited. I came in and signed all the signatory cards required. How can I resolve this?

Your help is greatly appreciated.

Hisham (Shawn) Hamed
Plaza Extra West
US Virgin Islands
Tel: 340.719-1870
Fax: 340.719-1874

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law. If you have received this communication in error, immediately return this communication to the sender and delete the original message and any copy of it in your possession.

On Friday, September 6, 2013 1:48 PM, "shawnhamed@yahoo.com" <shawnhamed@yahoo.com> wrote:

Sent from my BlackBerry 10 smartphone.

From: shawnhamed@yahoo.com
Sent: Friday, September 6, 2013 1:47 PM
To: Yvette Clendenen
Subject: Plaza Extra Account Access

Good day Mrs. Clendenen,



I cannot view checks written or even the check numbers of written checks. Can you please explain to me why I have limited access to the Plaza Extra accounts?

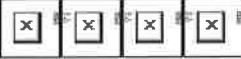
Thank you,
Hisham Hamed

Sent from my BlackBerry 10 smartphone.

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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

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

