

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS/ST. JOHN**

UNITED CORPORATION,

Plaintiff,

v.

WAHEED HAMED,
(a/k/a Willy or Willie Hamed),

Defendant.

Case No.: ST-13-CV-101

**PLAINTIFF UNITED’S MOTION TO
EXTEND TIME TO FILE ITS
RESPONSE IN OPPOSITION TO
DEFENDANT’S MOTION FOR
SUMMARY JUDGMENT**

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SUMMARY JUDGMENT**

COMES NOW Plaintiff United Corporation, (“Plaintiff United”), by its Counsel, and respectfully moves this honorable Court to extend the deadline to file any Response to Defendant’s Motion for Summary Judgment until April 7th, 2014. Pursuant to this Court’s February 11, 2014 Order, Plaintiff is required to file any Response to Defendant’s Summary Judgment Motion no later than March 7th, 2014. Plaintiff requests that the deadline of March 7th, 2014 be extended to April 7th, 2014 for the following reasons:

1. Plaintiff’s counsel has conferred with Defendant’s counsel regarding Plaintiff’s request to extend time for filing of its response to April 7th, 2014. Defendant’s counsel advised the undersigned that Defendant “will not actively oppose this Motion.”
2. Further, to properly oppose Defendant’s Motion for Summary Judgment, filed on February 5, 2014, Plaintiff’s counsel needs to review voluminous discovery. In addition to the large discovery, Plaintiff’s counsel has had to attend to a personal medical issue for the last three weeks, thereby affecting his ability to timely respond.

3. As Defendant's Motion is a dispositive motion, the court should allow Plaintiff additional time to respond to Defendant Motion for Summary Judgment.

4. This Motion is not intended to delay the proceedings in this matter.

WHEREFORE, the Court should grant this Motion to extend until April 7, 2014 the deadline for filing any responses to Defendant's Motion for Summary Judgment.

Dated: March 5th, 2014

Respectfully Submitted,
THE DEWOOD LAW FIRM
Counsel for Plaintiff


By: 

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT a true and exact copy of the foregoing was served via electronic mail on this 6th day of March 2014:

Carl J. Hartmann III, Esq.
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Nizar A. DeWood, Esq.