

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

MOHAMMAD HAMED, by his)
authorized agent WALEED HAMED,)

Plaintiff/Counterclaim Defendant,)

vs.)

FATHI YUSUF and)
UNITED CORPORATION,)

Defendants/Counterclaimants,)

vs.)

WALEED HAMED, WAHEED)
HAMED, MUFEED HAMED,)
HISHAM HAMED,)
and PLESSEN ENTERPRISES, INC.,)

Counterclaim Defendants.)

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF

JURY TRIAL DEMANDED

NOTICE OF FILING

Comes now the plaintiff and hereby files his **Third** Supplemental Rule 26 Self
Disclosures on defendant's counsel.

Dated: March 18, 2014



Joel H. Holt, Esq.
Counsel for Plaintiff
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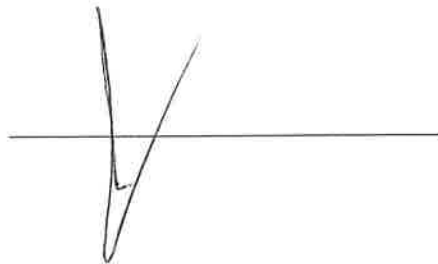
CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March, 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
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Mark Eckard, Esq.
Eckard, PC
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A handwritten signature in black ink is written over a horizontal line. The signature is stylized and appears to be the name 'Mark Eckard'.

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PLAINTIFF HAMED'S THIRD SUPPLEMENTAL RULE 26 DISCLOSURES

Comes now Mohammad Hamed (Hamed), by counsel, pursuant to Rule 26(a)(1) and hereby files his *Third Supplemental Disclosures* as follows:

WITNESSES:

1. Nisha Aubain– c/o Tropical Shipping & Construction Co., Ltd.
- has knowledge of contract between Plaza Extra and Tropical Shipping

DOCUMENTS:

Email dated March 17, 2014 from Nisha Aubain – 1 page

Dated: March 18, 2014



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From: Nisha Aubain [mailto:NAubain@tropical.com]
Sent: Monday, March 17, 2014 5:53 PM
To: Mikefususuf@yahoo.com; Willie Hamed; wallyhstx@yahoo.com; Nejeh F. Yusuf; Ysquare88@yahoo.com; mafi@plazaextra.com; shawn@plazaextra.com
Cc: Gordon Cole; Karla Yhan
Subject: Plaza Extra and Tropical Shipping
Importance: High

Good afternoon everyone.

To clarify conversations of late, please note the following:

- The Contract amendment to extend Plaza Extra's contract rates with Tropical Shipping from 2014 to 2017, was signed by Mike Yusuf and days later by Willie Hamed. The same contract.
 - o Both parties signed the same contract to ensure that both families associated with Plaza Extra were involved with the renewal.
 - o Mike requested on 2/6/14 that Seaside Market and Deli be removed from the Plaza Contract and that was done; again, both Mike and Willie signed the same contract.
- The existing contract is between Plaza Extra Supermarket (not United Corporation) and Tropical Shipping & Construction Co., Ltd.
 - o United Corporation was added to the Plaza Extra Contract on 5/28/08, in an amendment signed and executed by Willie.
 - o The existing contract lists the following affiliates (most have been affiliate for many years): All three Plaza Extra Stores, Hasim Hamed, Willie Hamed, Wally Hamed, Mufeed Hamed, Nejeh Yusuf, Mike Yusuf, Yusuf Yusuf and Untied Corp.
- Over the past 13 years both Mr. Yusuf and Willie have signed the contract extensions, amendments adding affiliates, negotiating terms and contract renewals.
 - o Willie signed the contract renewals from 2005 to 2011 (3 amendments), Mr. Yusuf signed the 2011 to 2014 extension (one amendment), and Mike and Willie signed the 2014 to 2017 extension (one amendment).

The relationship that Tropical Shipping have built with Plaza Extra is very important to us. More than this, the relationships that I have built with both families are very important to me and I would never do anything to jeopardize this. Tropical and myself are committed to being a natural party and ethical business partner to Plaza Extra. With this being said, if Tropical Shipping is to proceed in a manner that is different to the one described above, please provide written instructions as to how we are to move forward: who is allowed to sign amendments and contracts? Who does the VID checks go to? Who should Tropical communicate with if there is an issue?

Thank you!

Best regards,

Nisha F. Aubain
Tropical Shipping
Phone: (340)-714-6522
Cell: (340)-690-2358