

**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

**PLAINTIFF HAMED'S OPPOSITION
TO DEFENDANTS' EMERGENCY MOTION
FOR PROTECTIVE ORDER TO CANCEL DEPOSITIONS**


On Friday, March 28, 2014 at 5:13 p.m., Defendants filed a motion seeking to have this Court issue a protective order to cancel previously scheduled depositions-- to which Defendants had in fact stipulated.¹ Defendants will be taking the deposition of Mohammad Hamed and Wally Hamed on Monday and Tuesday, but it now seek to cancel the long scheduled depositions of the Defendant and other parties set to follow in the three days thereafter.

¹ By agreement, the deposition of Defendants Fathi Yusuf and United Corporation and 5 others will be done on Wednesday through Friday, April 2-4, 2014 -- following the depositions of Mohammad Hamed and Wally Hamed on March 31 and April 1.

The putative reason for Defendants' motion is the "late" filing of a "me too" deposition notice by a new co-defendant, Waleed Hamed, for the same already agreed upon times and places. However, it is clear no such "me too" deposition notices were needed, as any party's counsel can attend and ask questions, mooted the need for these "me too" notices.

Hence, the "me too" notices were hereby withdrawn by a simultaneous "Notice of Withdrawal of Deposition Notice" with this response, mooted the motion for a protective order. As such, the motion for a protective order can be denied as moot.

Dated: March 31, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2014, I served a copy of the foregoing by email in compliance with the parties consent to electronic service of all documents in this action on the following persons:

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A handwritten signature in blue ink is positioned above a horizontal line. The signature is stylized and appears to be the initials 'MWE'.