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

MOHAMMAD HAMED, by his) CIVIL NO. SX-12-CV-370
authorized agent WALEED HAMED,)
) ACTION FOR DAMAGES,
Plaintiff/Counterclaim Defendant,) INJUNCTIVE RELIEF
) AND DECLARATORY RELIEF
VS.)
) JURY TRIAL DEMANDED
FATHI YUSUF and UNITED CORPORATIO	N,)
)
Defendants/Counterclaimants,)
)
VS.)
)
WALEED HAMED, WAHEED HAMED,)
MUFEED HAMED, HISHAM HAMED, and)
PLESSEN ENTERPRISES, INC.,)
Additional Counterplains Defendants	
Additional Counterclaim Defendants.)
	_ /

DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF'S RENEWED MOTION TO SHOW CAUSE DATED OCTOBER 23, 2014 AND MOTION TO SHOW CAUSE DATED OCTOBER 28, 2014

Defendants/counterclaimants Fathi Yusuf ("Yusuf") and United Corporation ("United") (collectively, the "Defendants"), through their undersigned counsel, respectfully submit this Response In Opposition To Plaintiff's Renewed Motion To Show Cause Dated October 23, 2014 and Motion To Show Cause Dated October 28, 2014. Although Defendants categorically deny that plaintiff/counterclaim defendant Mohammad Hamed ("Hamed") is entitled to any relief pursuant to his serial motions to show cause (dated September 25, 2014, October 15, 2014, October 23, 2014, and October 28, 2014) and they dispute the allegations of fact purportedly supporting these motions, Defendants respectfully submit that as a result of the parties' conference with the Master on October 28, 2014, all matters raised in the pending Motions to Show Cause are now moot, and should be denied for the following reasons:

- Additional Counterclaim Defendant Waleed Hamed will return to work as a manager at the Plaza Extra – East store and his name will be returned to that store's electronic payroll.
- 2. The parties met on October 28 and 30, 2014 and Hamed was provided with all requested financial information and access to the accounting personnel who could answer any questions about such financial information. Further, with the assistance of the Master, the parties have agreed on procedures to obtain a current inventory of assets and equipment valuations.
- 3. Finally, in light of the agreements reached before the Master on October 28, 2014, all pending motions to show cause are now moot and should be dismissed without prejudice.

Accordingly, Defendants respectfully request this Court to enter an Order dismissing all Motions to Show Cause as most and providing such further relief as is just and proper.

Respectfully submitted,

THE DEWOOD LAW FIRM

DATED: November 4, 2014

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and

By:

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Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of November, 2014, I caused the foregoing **Defendants' Response In Opposition To Plaintiff's Renewed Motion To Show Cause Dated October 23, 2014 And Motion To Show Cause Dated October 28, 2014** to be served upon the following via e-mail:

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