**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

**MOHAMMAD HAMED**, by his )

authorized agent WALEED HAMED, )

)

*Plaintiff/Counterclaim Defendant*, )

)

vs. ) **CIVIL NO. SX-12-CV-370**

)

**FATHI YUSUF** and )

**UNITED CORPORATION**, ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND

) DECLARATORY RELIEF

*Defendants/Counterclaimants*, )

)

vs. ) JURY TRIAL DEMANDED

)

**WALEED HAMED, WAHEED** )

**HAMED, MUFEED HAMED,** )

**HISHAM HAMED,** )

and **PLESSEN ENTERPRISES, INC.**, )

)

*Counterclaim Defendants*. )

)

**JOINT STIPULATION TO FURTHER EXTEND SCHEDULING DEADLINES**

The Parties hereto, by their respective counsel, hereby submit a proposed Third Amended Scheduling Order, attached hereto as Exhibit 1, that extends certain deadlines by agreement while keeping the scheduled trial date. It is respectfully requested that the Order as submitted be approved and entered by the Court.

It should be noted that the Status Conference was moved from July 28th to August 5th as one defense counsel will be off-island on July 28. If the proposed August 5th date is not available for the Court, a revised Order can be submitted if a new date after August 5th is supplied by the Court.

The Parties have also agreed to certain extensions for the Plaintiff to file responses to the following motions:

1. Response to Defendant’s April 7, 2014, Motion To Appoint A Master/Wind Up the Partnership—it is agreed the Plaintiff has until April 30, 2014 to respond to this motion.
2. Response to Defendant’s April 8, 2014, Emergency Motion To Further Extend the Deposition of Mohammad Hamed-it is agreed the Plaintiff has until April 28, 2014, to respond to this motion.

Finally, the parties request a telephonic discovery conference during the first week of May to address all outstanding discovery motions so that these issues can be resolved well before the fact depositions are to be completed, which is June 6, 2014, under the proposed Third Amended Scheduling Order being submitted with this Stipulation.

**Dated:** April 17, 2014 By the Plaintiffs:

**Joel H. Holt, Esq.**

*Counsel for Plaintiff*

Law Offices of Joel H. Holt

2132 Company Street,

Christiansted, VI 00820

Email: holtvi@aol.com

Tele: (340) 773-8709

Fax: (340) 773-8677

**Carl J. Hartmann III, Esq.**

*Counsel for Plaintiff*

5000 Estate Coakley Bay, L-6

Christiansted, VI 00820

(340) 719-8941

carl@carlhartmann.com

Dated: April 17, 2014 By the Defendants:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Nizar A. DeWood**

*Counsel for Defendants*

The DeWood Law Firm

2006 Eastern Suburb, Suite 101

Christiansted, VI 00820

**Gregory H. Hodges**

*Counsel for Defendants*

Law House, 10000 Frederiksberg Gade

P.O. Box 756

St. Thomas, VI 00802

[ghodges@dtflaw.com](mailto:ghodges@dtflaw.com)

Dated: April 17, 2014 By Additional Counterclaim Defendants:

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Carl J. Hartmann III, Esq.**

*Counsel for the Waheed Hamed*

5000 Estate Coakley Bay, L-6

Christiansted, VI 00820

(340) 719-8941

[carl@carlhartmann.com](mailto:carl@carlhartmann.com)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Mark W. Eckard**

*Counsel for Waleed Hamed, Hisham Hamed and Mufeed Hamed*

Eckard, P.C.

#1 Company Street

P.O. Box 24849

Christiansted VI 00824