

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

MOHAMMAD HAMED,)	
)	CIVIL NO. SX-14-CV-287
Plaintiff,)	
v.)	ACTION FOR DAMAGES
)	AND DECLARATORY RELIEF
UNITED CORPORATION,)	
)	
Defendant.)	
)	
)	
)	

ANSWER AND COUNTERCLAIM

Defendant United Corporation (“United”), through its undersigned counsel, answers the correspondingly numbered paragraphs of the Complaint as follows:

1-4. Admitted.

5. Denied, except it is admitted that \$2.7 million was withdrawn by Fathi Yusuf (“Yusuf”) from a United account used in the operation of the Plaza Extra supermarkets and deposited into another United account controlled by United as a partial reconciliation of accounts between Mohammed Hamed (“Hamed”) and Yusuf.

6. Denied, except it is admitted that United was aware that Hamed objected.

7-9. Denied.

AFFIRMATIVE DEFENSES

1. The Complaint fails to state a claim upon which relief can be granted.

2. Hamed’s claims are barred by the doctrine of estoppel.

3. Hamed’s claims are barred by his fraud or inequitable conduct.

4. Hamed’s claims are barred by the doctrine of unclean hands.

5. Hamed’s claims are barred by the doctrine of laches or the applicable statute of

limitations.

6. Hamed’s claims are barred by the doctrine of waiver.

7. Hamed's claims are barred or diminished by United's right of recoupment and setoff.

8. Hamed has failed to join a necessary and indispensable party, namely, Yusuf.

For all the foregoing reasons, United respectfully requests this Court to dismiss the Complaint with prejudice, award United its reasonable costs and attorneys' fees, and provide United with such further relief as is just and proper under the circumstances.

COUNTERCLAIM

Pursuant to Fed. R. Civ. P. 13 and Super. Ct. R. 34, for its counterclaim against Hamed, United alleges:

JURISDICTION

1. This Court has subject matter jurisdiction pursuant to V.I. Code Ann. tit. 4, § 76(a).

RELATED PENDING LITIGATION

2. On September 17, 2012, Hamed filed suit against Yusuf and United in this Court, Hamed v Yusuf, et al, Civil No. SX-12-CV-370 (the "370 Case"). Among the allegations in the First Amended Complaint in the 370 Case were allegations that are substantially similar to Hamed's allegations in this case.

3. Specifically, in the 370 Case, Hamed alleged, *inter alia*, the following:

On or about August 20, 2012, Yusuf unilaterally and wrongfully converted \$2.7 million from Plaza Extra "supermarket accounts" used to operate the Partnership's three stores, placing the funds in a separate "non-supermarket" United account controlled only by him. Said conversion was a willful and wanton breach of the Partnership agreement between Hamed and Yusuf.

See ¶ 29 of the First Amended Complaint in the 370 Case and compare with ¶ 5 of the Complaint in this case. Among the relief sought by Hamed in the 370 Case was the following:

- 1) A full and complete accounting to be conducted by a court-appointed Master with Declaratory Relief against both defendants to establish Hamed's rights under his Yusuf/Hamed Partnership with Yusuf, including his rights regarding the operation of the three Plaza Extra supermarkets and the withdrawal of funds from the Partnership accounts associated with these three Plaza supermarkets;

- 3) Declaratory Relief and Injunctive Relief against both defendants requiring the immediate return of all funds improperly withdrawn from the bank accounts of the three Plaza supermarket accounts by Yusuf, including but not limited to the \$2.7 million recently removed by Yusuf to an account to which Hamed does not have access;

- 6) Declaratory Relief as to the Partnership's rights in any business and/or assets purchased by United using partnership assets or obtained without providing the Partnership the opportunity to participate in the ownership of these newly acquired businesses and/or assets[.]

See p. 15-16 of the First Amended Complaint in the 370 Case.

4. Yusuf and United filed a First Amended Counterclaim in the 370 Case seeking, *inter alia*, rent owed to United for the use and occupancy of the premises occupied by the Plaza

Extra supermarket in Sion Farm, St. Croix (“Plaza Extra – East”), and a full and complete accounting as between Hamed and Yusuf of the monies withdrawn from the Plaza Extra Stores by their respective families.

5. As a comparison of the First Amended Complaint in the 370 Case with the Complaint in this case shows, the claims alleged and relief sought by Hamed in this case are encompassed within the 370 Case. Further, the pleadings, discovery, and sworn testimony in the 370 Case establish that the \$2.7 million at issue in both cases was money taken by Yusuf under a claim of right pursuant to his business agreement with Hamed.

FACTS COMMON TO ALL COUNTS

6. United was incorporated in 1979. Yusuf is an officer, director and the principal shareholder of United and Yusuf’s wife and children comprise the remaining officers, directors, and shareholders of United, which developed, owns and operates United Shopping Plaza on St. Croix.

7. In April 1986, Plaza Extra – East was opened at United Shopping Plaza. In October 1993, the Plaza Extra supermarket in Tutu Park Mall, St. Thomas (“Plaza Extra – Tutu Park”) was opened. In 2000, the Plaza Extra supermarket in Grove Place, St. Croix (“Plaza Extra – West”) (collectively, the “Plaza Extra Stores”) was opened.

8. In return for a modest investment of money and because Hamed was his brother-in-law, Yusuf agreed with Hamed to equally divide the net profits of the Plaza Extra Stores after payment of rent, expenses (including insurance covering United Shopping Plaza), and taxes (including United’s gross receipts taxes).

9. Hamed and Yusuf agreed that rent owed to United for the premises occupied by Plaza Extra – East would accrue until such time as Yusuf decided that their business accounts

should be reconciled. The reconciliation of business accounts would not only involve payment of accrued rent to United, but also advances that Hamed and Yusuf had taken by withdrawing money from the Plaza Extra Stores' safes. Under their agreement, Yusuf was the person responsible for making all decisions regarding when the reconciliation would take place and hence when the rent would be paid.

10. There has been only one full reconciliation of accounts since the business agreement between Hamed and Yusuf was formed, and it occurred at the end of 1993. The rent payment due United from 1986 through December 31, 1993 was paid by means of a setoff on an account that reflected credits and debits made between Hamed and Yusuf. Specifically, Hamed's one-half portion of the rent was paid by means of a setoff against amounts Yusuf owed him by virtue of some large withdrawals made in preceding years.

11. On October 23, 2001, the Federal Bureau of Investigation ("FBI") raided the Plaza Extra Stores and United's office seizing substantially all of the financial and accounting records of the Plaza Extra Stores. Shortly before the raid, one of Hamed's sons (Mufeed) and one of Yusuf's sons (Maher) examined and tabulated some but not all of the receipts from the Plaza Extra – East store safe reflecting cash withdrawals made over the years by Hamed and his sons and Yusuf and his sons. After calculating the total withdrawals these receipts showed were made by each family, it was agreed that the Hameds had withdrawn \$2.9 million and the Yusufs \$1.3 million leaving a balance due to Yusuf of \$1.6 million.

12. In September 2003, United, Yusuf, two of Yusuf's sons, and two of Hamed's sons were indicted on a number of charges arising out of the operation of the Plaza Extra Stores, including conspiracy to defraud the United States, money laundering, mail fraud, conspiracy to evade taxes, causing false tax returns, and conspiracy to conduct a criminal enterprise. Hamed,

who had retired in 1996 and returned to Jordan, was not indicted since his continuing role as a partner in the Plaza Extra Stores was not evident and the defendants in the criminal case, who were operating under a joint defense agreement, were counseled not to take any action suggesting the existence of a partnership. Pursuant to a plea agreement entered in February 2010, United pled guilty to one count of tax evasion and paid millions of dollars in taxes, interest, and penalties. All charges against the individual defendants were thereafter dismissed with prejudice.

13. In late 2010, Yusuf received information from the Department of Justice in the criminal case that showed or strongly suggested that Hamed and his son, Waleed, had taken or “skimmed” millions of dollars from the Plaza Extra Stores without Yusuf’s knowledge.

14. Pursuant to a letter dated August 15, 2012 to Hamed written on behalf of Yusuf, notice was given to Hamed that Yusuf would be withdrawing the sum of \$2,784,706.25 from United’s operating account for the Plaza Extra Stores. As explained in the letter, attached as **Exhibit A**, that amount represented the sum of \$1,600,000 (the reconciled receipts tabulated from the Plaza Extra – East safe prior to the FBI raid), \$1,095,381.75 (reflected in additional attached receipts that had not been examined by Maher Yusuf and Mufeed Hamed shortly before the FBI raid), and 50% of the balances in two foreign bank accounts containing money from the Plaza Extra Stores.

15. While Yusuf withdrew the \$2,784,706.25 over the objection of Hamed, the propriety of the withdrawal is the subject of Hamed’s and Yusuf’s claims for accounting pending in the 370 Case. Hamed has been aware of United’s purchase of the property described in ¶ 7 of the Complaint in this case since at least January 25, 2013, the date of the hearing on his emergency motion for injunctive relief in the 370 Case, since United’s purchase of this property

was a subject of testimony at that hearing. Since that time, Hamed has made no effort to establish that any portion of the \$2,784,706.25 withdrawn by Yusuf was in fact used by United to purchase any property.

COUNT I

DECLARATION

16. Paragraphs 1 through 15 of this Counterclaim are realleged.

17. There is an actual controversy between Hamed and United regarding their respective rights and obligations with respect to the \$2,784,706.25 withdrawn by Yusuf from an operating account of the Plaza Extra Stores in August 2012.

18. United is entitled to a judgment declaring that it has no liability or obligation to Hamed whatsoever with respect to any withdrawal made by Yusuf from the Plaza Extra Stores and that Hamed's notice of lis pendens filed in this case must be discharged of record.

COUNT II

SLANDER OF TITLE

19. Paragraphs 1 through 18 of this Counterclaim are realleged.

20. In recording the lis pendens in this matter, see Exhibit A to the Complaint, Hamed published false statements, namely, that he has valid claims affecting title to United's property and that United does not hold clear, legal title to such property.

21. Hamed's publication is harmful to United's interest in the property and was made by Hamed with either the intent to harm United or with recognition that it was likely to do so.

22. Hamed knew that the statements published in his notice of lis pendens were false and misleading or acted in reckless disregard of the falsity of such statements.

23. As a result of Hamed's slander of title, United has suffered loss including, but not limited to, impairment of vendibility or value caused by Hamed's disparagement, carrying costs for the property, and the expense United has incurred and will continue to incur to counteract Hamed's false publication.

Accordingly, United respectfully requests entry of judgment in its favor providing the following relief:

- i. a judgment declaring that United has no liability or obligation to Hamed whatsoever with respect to Yusuf's withdrawal of \$2,784,706.25 or any other amount from the Plaza Extra Stores and discharging the notice of lis pendens Hamed recorded against United's property;
- ii. a judgment against Hamed for compensatory, consequential, and punitive damages for his slander of United's title to property in such amount as United establishes entitlement at trial;
- iii. judgment awarding United its reasonable attorneys' fees and costs in defending against the Complaint and prosecuting this Counterclaim; and
- iv. judgment providing such other and further relief as the Court deems just and proper.

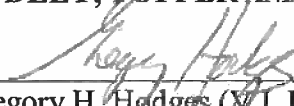
Pursuant to Fed. R. Civ. P. 38(b), United demands a trial by jury of all issues triable by right to a jury.

Respectfully submitted,

DUDLEY, TOPPER AND FEUERZEIG, LLP

Dated: August 18, 2014

By:


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Telephone: (340) 773-3444
Telefax: (888) 398-8428
Email: info@dewood-law.com

Attorneys for Fathi Yusuf

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2014, I caused the foregoing Answer and Counterclaim to be served upon the following via United States mail:

Joel H. Holt, Esq.
LAW OFFICES OF JOEL H. HOLT
2132 Company Street
Christiansted, V.I. 00820
Email: holtvi@aol.com

Carl Hartmann, III, Esq.
5000 Estate Coakley Bay, #L-6
Christiansted, VI 00820
Email: carl@carlhartmann.com

**DUDLEY, TOPPER
AND FEUERZEIG, LLP**

1000 Frederiksberg Gade
P.O. Box 756

St. Thomas, U.S. V.I. 00804-0756

(340) 774-4422



UNITED CORPORATION
d/b/a PLAZA EXTRA SUPERMARKET
4C & 4D Sion Farm
Christiansted, VI 00820

BY HAND DELIVERY

*Received by
8/16/2012*

Date: August 15, 2012

Mohammed Hamed
By and through Waleed Hamed
Plaza Extra Supermarket
Sion Farm Store
Christiansted, V.I. 00820

Re: Notice of Withdrawal

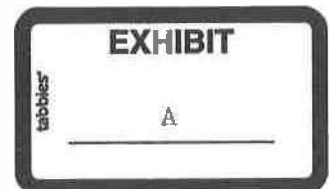
Dear Mr. Hamed,

The amount of \$2,784,706.25 will be withdrawn from United's operating account effective August 15th, 2012. This amount equals the proceeds you previously withdrew through your agent Waleed Hamed. To ensure full accuracy, attached are the receipts you requested during mediation demonstrating the \$1,095,381.75 of withdrawals. The below itemized amounts are not in dispute.

Past Confirmed Withdrawals	\$1,600,000.00
Additional Withdrawals per the attached requested receipts	\$1,095,381.75
Fifty percent (50%) of St. Maarten Bank Account	\$44,355.50
Fifty percent (50%) of Cairo Arabian Bank	\$44,696.00

Should you have any concerns about these amounts, please provide the basis for your concerns in writing. Thank you.

Yours
Fathi Yusuf
for Fathi Yusuf



Mohammed Hamad

1	8/3	5,000.00	1
2	8/15	10,000.00	2
3	9/6	20,035.00	3
4	9/14	5,010.00	4
5	9/21	3,000.00	5
6	9/26	1,000.00	6
7	10/3	20,000.00	7
8	10/17	15,000.00	8
9	10/27	5,000.00	9
10	10/31	6,000.00	10
11	11/2	15,075.00	11
12	11/22	8,000.00	12
13	11/29	10,000.00	13
14	12/12	7,510.00	14
15	12/20	20,000.00	
16	12/16	11,000.00	
17	1/24	4,000.00	
18	2/9	4,000.00	
19	2/10	10,000.00	
20	2/20	2,500.00	
21	3/27	2,700.00	
22	3/27	2,000.00	
23	4/24	12,000.00	23
24	5/22	20,000.00	24
25	6/19	4,000.00	25
26	7/17 (Car)	12,500.00	26
27	7/20	20,000.00	27
28	8/1	1,000.00	28
29	8/14	25,040.00	29
30	8/24	710.00	30
31	9/11	7,010.00	31
32	10/13	1,500.00	32

10/25	Bank of America	2,085.00
10/26		2,000.00
11/5		40,015.00
11/11	Tractor from F. to M. Wood	2,575.00
12/14		20,000.00
12/17	311,965.00	6,500.00 *
1/7		92,000.00
1/21		1,500.00
1/23		1,500.00
1/30		40,000.00
2/14		3,000.00
3/10		25,000.00
3/20		3,000.00
4/16	Walmart 149,350	146,385.00 *
4/27	Walmart	2,200.00
11	Walmart	2,440.00
4/23	Walmart	2,500.00
from 8/6 to 9/6	Walmart	67,960.00
from 10/1 to 11/1	Walmart	63,108.00
1/15/17	Walmart	22,000.00
2/5		18,000.00
3/10		20,000.00
3/31		15,000.00
5/7	864,514.00	35,000.00 **

PLAZA ETNA
 40-40 BLOOMINGHAM
 CATED, ST. CROIX V.I. 00820
 (809) 778-8240

CUSTOMER'S ORDER NO. _____ DATE 8/2 1997
 NAME Wally PHONE NO. _____
 ADDRESS _____

SOLD BY	CASH	CHECK	CHARGE	C.O.D.	ON ACCOUNT	PAY OUT	IN REB.
QUAN.	DESCRIPTION			PRICE	AMOUNT		
	<u>that's fine</u>				<u>35,000.00</u>		
This Water is Not Sold As Drinking Water						TAX	
Received by <u>[Signature]</u>						TOTAL	<u>35,000.00</u>

01193 Thank You
 All claims and returned goods must be accompanied by this bill
 PRINTED IN U.S.A.

[Signature]
 5,000.00
 DEFENDANT'S RESPONSE
 0112038

PLAZA EXTRA
 4C-4D SION FRAM
 GATED, ST. CROIX V. I. 00820
 (809) 778-6240

CUSTOMER'S ORDER NO. _____ DATE 5/7 97
 NAME Wally PHONE NO. _____
 ADDRESS _____

SOLD BY	CASH	CHECK	CHARGE	C.O.D.	ON ACCT	PAID OUT	NOSE REF.
---------	------	-------	--------	--------	---------	----------	-----------

QUAN.	DESCRIPTION	PRICE	AMOUNT
-------	-------------	-------	--------

	<u>thirty five</u>	<u>00</u>	<u>35,000.00</u>
--	--------------------	-----------	------------------

This Water is Not Sold
 As Drinking Water

TAX _____

Received by: [Signature]

TOTAL 35,000.00

01193 Thank You PRINTED IN U.S.A.

PLAZA EXTRA
 4C-4D SION FRAM
 GATED, ST. CROIX V. I. 00820
 (809) 778-6240

CUSTOMER'S ORDER NO. _____ DATE 5/31 97
 NAME Mohamed Hamed PHONE NO. _____
 ADDRESS _____

SOLD BY	CASH	CHECK	CHARGE	C.O.D.	ON ACCT	PAID OUT	NOSE REF.
---------	------	-------	--------	--------	---------	----------	-----------

QUAN.	DESCRIPTION	PRICE	AMOUNT
-------	-------------	-------	--------

			<u>15,000.00</u>
--	--	--	------------------

This Water is Not Sold
 As Drinking Water

TAX _____

Received by: [Signature]

TOTAL 15,000.00

01174 Thank You PRINTED IN U.S.A.

PLAZA EXTRA
4C-4D SIGN FRAM
CSTED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.

DATE

NAME

Muhammad Hamed

PHONE NO.

ADDRESS

PAID BY CASH CHECK CHARGE C.O.D. ON ACCT. PAID OUT MORE REC.

QUAN.	DESCRIPTION	PRICE	AMOUNT
-------	-------------	-------	--------

10,000.00

This Water is Not Sold
As Drinking Water

TAX

TOTAL

10,000.00

01125

Thank You

PRINTED IN U.S.A.

All claims and returned goods must be accompanied by this bill.

PLAZA EXTRA
4C-4D SIGN FRAM
CSTED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.

DATE

NAME

Muhammad Hamed

PHONE NO.

ADDRESS

PAID BY CASH CHECK CHARGE C.O.D. ON ACCT. PAID OUT MORE REC.

QUAN.	DESCRIPTION	PRICE	AMOUNT
-------	-------------	-------	--------

20,000.00

This Water is Not Sold
As Drinking Water

TAX

TOTAL

20,000.00

01157

Thank You

PRINTED IN U.S.A.

All claims and returned goods must be accompanied by this bill.

DEFENDANT'S RESPONSE

FY 004127

0112040

PLAZA EXTRA 446-0060
 4C-4D SION FRAM
 C'STED, ST. CROIX V. I. 00820
 (809) 778-6240

CUSTOMER'S ORDER NO.		DATE		3-13 1998	
NAME					
ADDRESS					
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT	MOBL. RETD.
QUAN.	DESCRIPTION			PRICE	AMOUNT
	Two thousand				\$ 2000.00
	Plastering				
	Blouse				
	\$ 750.00				
TAX					
TOTAL					2000.00

ALL claims and returned goods MUST be accompanied by this bill.

00646

Rec'd by _____

DATE FORGON 7 JAN 2007
 80620/0024 Plaza EXTE

Total 98 = 13,650.-

446-0061

PLAZA EXTRA
4C-4D SIGN FRAM
ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE				
NAME		9/27/98				
ADDRESS						
SOLD BY	CASH	C.O.D.	CHARGE	ON ACCT.	MOSE. PAID.	PAY OUT
QUAN.		DESCRIPTION		PRICE	AMOUNT	
		+ 1/250 S.M.			8.000 00	
		TAX				
				TAX		
				TOTAL	8.000 00	

ALL claims and returned goods MUST be accompanied by this bill.

00708

Rec'd by

RAPIDFORMS 7443-377
800-257-6364 7443-377

DEFENDANTS' RESPONSE
0112042

FY 004129

446-0091

FRAM (TRA
40-40 5/16 FRAM
LITCHFIELD, ST. JOHN V.I. 00820
(809) 773-6240

CUSTOMER'S ORDER NO.		DATE		4120		19 98	
NAME <i>Wally</i>							
ADDRESS							
SOLD BY	CASH	C.O.D.	CHEQUE	CREDIT	MOSE RETR.	PKD OUT	
QUAN.	DESCRIPTION			PRICE	AMOUNT		
					<i>5000</i>		
	<i>improvis</i>						
	<i>Wally</i>						
				TAX	<i>00</i>		
				TOTAL	<i>5000</i>		

ALL claims and returned goods MUST be accompanied by this bill.

00794

Rec'd by *Jack*

RAPIDFORMS 74462 - SPT
800257-0304 74463 - SPT

340-0050

PLAZA EXTRA
4C-4D SION FRAM
COSTED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE	7/3	99
NAME		Wally		
ADDRESS				

QUAN.	DESCRIPTION	PRICE	AMOUNT
	the hood		10 300.00
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

02700

Rec'd by

RAPID FORMS 74488-8FE
803/287-6354

DEFENDANTS' RESPONSE

0112051

FY 004138

340-0048

PLAZA EXTRA
 4C-4D SHIN FRAM
 CUSTED, ST. CROIX V. I. 00820
 (809) 778-8240

CUSTOMER'S ORDER NO.	DATE
NAME	19
<i>Wentley</i>	
ADDRESS	
<i>1000</i>	

QUAN.	DESCRIPTION	PRICE	AMOUNT
	<i>Fin...</i>		\$500.00
	<i>Thank you!</i>		
	<i>Wentley</i>		
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

694

Rec'd by

RAPIDFORMS
 800.257.9364

340-0052

PLAZA EXTRA
40-4D SION FRAM
D'STED. ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE	9/3	19 99
NAME <i>Wall</i>				
ADDRESS				
QUAN. DESCRIPTION PRICE AMOUNT				
	<i>one</i>			
<i>Thank You!</i>				
TAX				
TOTAL				<i>100.00</i>

ALL claims and returned goods MUST be accompanied by this bill.

02698

Rec'd by

Juan Roman

RAPIFORMS 7443 - 527
800257-6301 7443 - 527

340-0047

PLAZA EXTRA
4C-4D SIGN PROGRAM
10820
809) 771-8240

CUSTOMER'S ORDER NO.		DATE	10/11/8	TO	37
NAME		Waco			
ADDRESS					
QUAN.	DESCRIPTION	PRICE	AMOUNT		
		\$200.00			
<i>Thank You!</i>					
<i>Thank You!</i>					
		TAX			
		TOTAL	\$200.00		

ALL claims and returned goods MUST be accompanied by this bill.

02946

Rec'd by

RAPIDFORMS 74403-811
800/257-3054

DEFENDANTS' RESPONSE
0112055

FY 004142

340-0046

PLAZA EXTRA
4C-4D SION FRAM
C/S FED. ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE	
NAME		11/8 1999	
ADDRESS			
QUAN.			
DESCRIPTION			
PRICE		AMOUNT	
		5,000.00	
Thank you!			
TAX			
TOTAL			

ALL claims and returned goods MUST be accompanied by this bill.

02950

Rec'd by

RAPIDFORMS 74403-571
606257-5054

DEFENDANTS' RESPONSE

0112056

FY 004143

340-0044

PLAZA EXTRA
4C-4D SIL IN FRAM
10810 ST. CLAY AVE. I. 00820
(809) 722-4000

CUSTOMER'S ORDER NO.		DATE	11/23	19	75
NAME		Wally			
ADDRESS					
QUAN.	DESCRIPTION	PRICE	AMOUNT		
	Jaini		\$1600.00		
	one Hirsch				
	Six				
Thank					
		TAX			
		TOTAL	\$1600.00		

ALL claims and returned goods MUST be accompanied by this DR.

03796

Rec'd by

7448-344
800-267-8354

DEFENDANTS' RESPONSE
0112057

FY 0044

340-0043

PLAZA EXTRA
4C-4D SION FRAM
CSTED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE <u>11/30</u>	
NAME		10:45	
ADDRESS <u>Wiley</u>			

QUAN.	DESCRIPTION	PRICE	AMOUNT
..4000.00		\$	5000.00
	SALE		
THANK YOU!			
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

03792

Printed By:

RAPIDFORMS 7482 - 8PT
800/257-8384 7483 - 8PT

DEFENDANTS' RESPONSE
0112058

FY 004145

340-0040

PLAZA EXTRA
 4C-4D SION FRAM
 ESTED, ST. CROIX V. I. 00820
 (809) 778-6240

CUSTOMER'S ORDER NO.	DATE
NAME	12-17-99
WALLY Hamed	
ADDRESS	

QUAN.	DESCRIPTION	PRICE	AMOUNT
01	Chair		\$10.00
	WALL Hamed		
Thank You!			
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

3 59

Rec'd by *[Signature]*

RAPIFORMS 7443
 800-257-6334 7443-3PT

DEFENDANTS RESPONSE

0112061

FY 004148

340-0038

PLAZA EXTRA
4C-4D SION FRAM
STED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.	DATE
NAME	12-27 19 95
ADDRESS	

QUAN.	DESCRIPTION	PRICE	AMOUNT
1	4C-4D SION FRAM		11.77 00
Thank You!			
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

03281

Rec'd by *Lynn Rose*

SAFECORP
800-227-3884 7443-3872

340-0037

PLAZA EXTRA
4C-4D SION FRAM
USTED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE	
NAME <i>Wally</i>		<i>01-10 100</i>	
ADDRESS			
QUAN.	DESCRIPTION	PRICE	AMOUNT
	<i>Thin Thawed</i>	<i>7.31</i>	<i>1</i>
<i>Thank You!</i>			
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

03135

Rec'd by

PLAZA EXTRA 74483-821
809-778-6240

Total in 2000 = 85,122

DEFENDANTS' RESPONSE
0112063

FY 004150

340-0036

PLAZA EXTRA
4C-4D SION FRAM
DISTED, ST. CROIX V. I. 00820
(809) 778-8240

CUSTOMER'S ORDER NO.		DATE	01-14	19	00
NAME		Wemyth			
ADDRESS					
QUAN.	DESCRIPTION	PRICE	AMOUNT		
	Thin + 4 in. sent for 1 hour 1/2	3500	07		
Thank you!					
Wemyth		TAX			
		TOTAL	3500	07	

ALL claims and returned goods MUST be accompanied by this bill.

031.39

Rec'd by _____

RAPIDFORMS 74402-2PT
800-257-8334 74403-3PT

DEFENDANTS' RESPONSE

0112064

FY 004151

340-0035

PLAZA EXTRA
4C-4D SION FRAM
C/STED, ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE	01-25	19	00
NAME <i>H. Kelly</i>					
ADDRESS					
QUAN.	DESCRIPTION	PRICE	AMOUNT		
	<i>Two thin Snow</i>	<i>1.85</i>	<i>25.00</i>	<i>02</i>	
<i>Thank You!</i>					
		TAX			
		TOTAL	<i>26.85</i>		

ALL claims and secured goods MUST be accompanied by this bill.

03167

Rec'd by

RAPIDFORMS 74483-3PT
800/257-8364 74483-3PT

340-0034

PLAZA EXTRA
4C-4D SION FRAM
ST. CROIX V. I. 00820
(809) 778-6240

CUSTOMER'S ORDER NO.		DATE	
		01-27 19 00	
NAME			
Walker			
ADDRESS			
QUAN.	DESCRIPTION	PRICE	AMOUNT
		4	3 USD 00
	Three Thousand		
	THANK YOU		
		TAX	
		TOTAL	

ALL claims and returned goods MUST be accompanied by this bill.

03154

Rec'd by _____

RAPIDFORMS 74483-3PT
800-257-8364

DEFENDANTS' RESPONSE
0112066

FY 004153

340-0031

PLAZA EXTRA
4C-4D SION FRAM
C'STED, ST. CROIX V. I. 00820
(809) 778-8240

CUSTOMER'S ORDER NO.		DATE	2/18	19 00
NAME		Wm. H. J.		
ADDRESS				
QUAN.	DESCRIPTION	PRICE	AMOUNT	
			1785	00
	note from 5:00			
	... of early pm			
	... 5:00			
	Thank you			
		TAX		
		TOTAL	1785	00

ALL claims and returned goods MUST be accompanied by this bill.

01920

Rec'd by _____

RAPIDFORMS 74482 - SPT
800-257-8354 74483 - SPT

DEFENDANTS' RESPONSE
0112067

FY 004154

38469

340-0025

Customer's
Order No.

Date

2/23

1900

Name

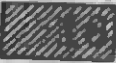
Nully H...

Address

SOLD BY		CASH	C. O. D.	CHANGE	ON ACCT	DEBIT NETS	PAID OUT	
QUAN.	DESCRIPTION			PRICE	AMOUNT			
	Handwritten						Handwritten	
	<i>Handwritten</i>						<i>Handwritten</i>	

All claims and returned goods MUST be accompanied by this bill:

Rec'd By

NO.  51

340-0024

NAME		DATE
ADDRESS		4/17/00
CITY, STATE, ZIP		

PAID BY	CASH	C.A.B.	CHEQUE	ON ACCT.	DEBITED	PAID BY
---------	------	--------	--------	----------	---------	---------

CUSTOMER'S ORDER NO.		RECEIVED BY:
		<i>1900</i>

Ken H. [unclear]
[unclear]

KEEP THIS COPY FOR YOUR RECORDS
©1998 REPORT # 8L240

340-0022

NO.  80

NAME	<i>Wally</i>	DATE	<i>2/1/50</i>
ADDRESS:			
CITY, STATE, ZIP			

PAID BY	CASH	C.O.D.	CHECK	ON ACCT.	PHONE RTR.	PAY 907
---------	------	--------	-------	----------	------------	---------

1							
	<i>Four thousand</i>						<i>4000.00</i>
CUSTOMER'S ORDER NO.				RECEIVED BY:			

KEEP THIS COPY FOR YOUR RECORDS

CLASS. RECORDS - 61348

NO. ██████ 89

340-0020

NAME: *Villod*

ADDRESS: *Nelly*

CITY, STATE, ZIP

SOLE DR	CASH	C.A.B.	GRAND	ON ACC.	FORMS ETC.	PAY OUT

						\$ 3500.00
<i>Three thousand five hundred</i>						
<i>[Signature]</i>						\$ 3500.00

CUSTOMER'S ORDER NO.

RECEIVED BY:

KEEP THIS COPY FOR YOUR RECORDS
CROSS REFERENCE SL 240

340-0019

PLAZA EXTRA

4C-4D'SION FRAM
CISTED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.	PHONE	DATE
NAME		6/17/00
ADDRESS		
CASE	S.O.D.	
four hands		R 400.00
Dung		TAX
SOLD BY	RECEIVED BY	TOTAL 400.00

© PRODUCT 801 All claims and returned goods MUST be accompanied by this bill.

1838


To Reorder:
800-226-8360 or nebs.com

Thank You

DEFENDANTS' RESPONSE

0112074

FY 004161

NO.  42 340-0018

NAME: <i>[Handwritten]</i>	DATE: <i>6/2/80</i>
ADDRESS: <i>Wally</i>	
CITY, STATE, ZIP	

<input type="checkbox"/> PAID BY	<input type="checkbox"/> CASH	<input type="checkbox"/> C.O.D.	<input type="checkbox"/> CHARGE	<input type="checkbox"/> ON ACCT.	<input type="checkbox"/> NEWS PAPER	<input type="checkbox"/> POST OFF
----------------------------------	-------------------------------	---------------------------------	---------------------------------	-----------------------------------	-------------------------------------	-----------------------------------

AMOUNT	<i>\$ 3500.00</i>
<i>Three thousand five hundred & no/100</i>	
<i>[Signature]</i>	
CUSTOMER'S ORDER NO.	RECEIVED BY:

KEEP THIS COPY FOR YOUR RECORDS
01998 RECORDS 54246

DEFENDANTS' RESPONSE
0112075

PY 004162

NO.  44

340-0017

NAME:	DATE: 6/26/00
ADDRESS: Nelly	
CITY, STATE, ZIP	

SOLD BY	CASH	C.R.A.	CHARGE	ON ACCT.	INSTR. BY	Paid Off
---------	------	--------	--------	----------	-----------	----------

<i>five thousand</i>					5000	00
<i>10/11</i>						
					\$	5000 00
CUSTOMER SIGNATURE NO.:				RECEIVED BY:		

KEEP THIS COPY FOR YOUR RECORDS
 01998 01998 01998

340-0016

NO. 47

NAME:	DATE:
ADDRESS: <i>Walley Han</i>	<i>8/30/00</i>
CITY, STATE, ZIP	

SOLD BY	CASH	C.O.D.	OR. AMT.	MONEY ORDER	PAID BY

<i>four thousand</i>	<i>\$ 4000.00</i>
<i>\$ 4000.00</i>	

CUSTOMER'S ORDER NO.	RECEIVED BY:
----------------------	--------------

KEEP THIS COPY FOR YOUR RECORDS
~~01206~~ ~~0112077~~ ~~0112077~~

340-0015

PLAZA EXTRA

4C-4D SION FRAM
C'STED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.	PHONE	DATE
		7/7/00
NAME		
Wally Hain		
ADDRESS		
QTY	DESC.	PRICE
		\$ 13362.00
Thank you Thousand Thank you to Friend		
Dough		TAX
SOLD BY	RECEIVED BY	TOTAL
		13362.00

© PRODUCT 629 All claims and returned goods MUST be accompanied by this bill.

1475

To Reorder:
201-225-6380 or nabe.com

Thank You

DEFENDANTS' RESPONSE

0112078

FY 004165

340-0014

PLAZA EXTRA

4C-4D SION FRAM
CATED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.		PHONE	DATE																																								
NAME		8/7/00																																									
ADDRESS W. Kelly																																											
<table border="1"> <thead> <tr> <th>QTY</th> <th>DESC</th> <th>PRICE</th> <th>AMOUNT</th> </tr> </thead> <tbody> <tr> <td></td> <td>TB - the</td> <td></td> <td></td> </tr> <tr> <td></td> <td>...</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>				QTY	DESC	PRICE	AMOUNT		TB - the				...																														
QTY	DESC	PRICE	AMOUNT																																								
	TB - the																																										
	...																																										
SOLD BY		RECEIVED BY	TAX																																								
			TOTAL																																								
			200.00																																								

All claims and returned goods MUST be accompanied by this bill.

1528

To Reorder: 800-225-5360 or nls.com

Thank You

DEFENDANTS' RESPONSE
0112079

FY 004166

340-0013

PLAZA EXTRA

4C-4D SION FRAM
C'STED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.		PHONE		DATE 5/11/2000	
NAME <i>Carla G.</i>					
ADDRESS					
QTY	PRICE	CHARGE	BLADCT	NO. OF PPS	PAY OUT
<i>four thousand</i>					\$ 4000.00
SOLD BY <i>[Signature]</i>					TAX
RECEIVED BY					TOTAL <i>4000.00</i>

PRODUCT 000 All claims and returned goods MUST be accompanied by this bill.

1522!

To Reorder:
800-225-5380 or nebs.com

Thank You

DEFENDANTS' RESPONSE

0112080

FY 004167

340-0012

PLAZA EXTRA

4C-4D SION FRAM
C'STED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.		PHONE	DATE 8/13/00
NAME Nally			
ADDRESS			
CASH	C.C.B.	CHEQUE	TOTAL PAID OUT
<i>Three in line</i> <i>Taxant, fine</i> <i>cancel the price</i> <i>W.H.</i>			\$325.00
SOLD BY			TAX
RECEIVED BY			TOTAL \$325.00

© PRODUCT claims and returned goods MUST be accompanied by this bill.

1194

To Reorder:
800-225-6380 or nabs.com

Thank You

DEFENDANT'S RESPONSE

0112081

FY 004168

340-0010

PLAZA EXTRA

4C-4D SION FRAM
C'STED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.		PHONE	DATE
			8/25/00
NAME			
<i>Miller</i>			
ADDRESS			
CASH	C.O.D.	CHEQUE	CN ACCT. DEBIT CRDT
<i>Four thousand five hundred</i>			4500.00
TAX			
TOTAL			4,500
PAID BY		RECEIVED BY	
<i>[Signature]</i>		<i>[Signature]</i>	

PRODUCT 209 All claims and returned goods MUST be accompanied by this bill.

1495

To Reorder:
800-225-6360 or nabe.com

Thank You

DEFENDANTS' RESPONSE

0112082

FY 004169

340-0011

PLAZA EXTRA

4C-4D SION FRAM
C'STED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.		PHONE	DATE
NAME		9/28/00	
ADDRESS			
<i>four thousand seven hundred fifty</i>			
			\$4750.00
<i>Wm Jtt.</i>			
TAX			
TOTAL		4750.00	

All claims and returned goods MUST be accompanied by this bill.

1512

To Reorder:
800-326-6300 or nabco.com

Thank You

DEFENDANT'S RESPONSE

0112083

FY 004170

340-0008

PLAZA EXTRA

4C-4D SION FRAM
C'STED, ST. CROIX V.I. 00820
(340) 778-6240

CUSTOMER'S ORDER NO.		PHONE	DATE
NAME		10/19/00	
wally Harnock			
ADDRESS			
CASH	C.D.E.	CHECK	PAY OUR
<i>That has said fine in school D. J. H.</i>			3500.00
SOLD BY			TAX
RECEIVED BY			TOTAL 3500.00

C PRODUCT #28 All claims and returned goods MUST be accompanied by this bill.

1779

To Reorder:
800-225-6390 or neba.com

Thank You

DEFENDANTS' RESPONSE

0112054

FY-004171

Plaza Extra - 1002

4C & D Estate Stone Farm
Fsted, St. Croix, V.I. 00821
Tel: (340) 778-8240
Fax: (340) 778-1200

#14 Estate Plassen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No.		2/8/01							
Account Name		Wally Hamed							
Address		Phone							
SOLD BY		CASH		C.O.D.		CHECK		C.HARGE	
QUAN		DESCRIPTION		PRICE		AMOUNT			
			Seven hundred Twenty		\$		7201.00		
			Med House						
			france						
							\$ 720.00		
Received by		C. H. Francis							
All claims and returned items MUST be accompanied by this invoice									

340-0053

Total amount 95,365

DEFENDANTS' RESPONSE
0112085

FY 004172

Plaza Extra 1153

4C & D Estate Sion Farm
C'sted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
F'sted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No. <u>37761</u>				
Account Name <u>Edwally H...</u>				
Address _____				
Phone _____				
SOLD BY _____	CASH _____	COD _____	CHECK _____	CHARGE _____
QUAN _____	DESCRIPTION <u>one thousand one hundred Sixty SIX</u>	PRICE <u>\$ 1166.00</u>	AMOUNT <u>\$ 1166.00</u>	
449-1649				
Received by <i>[Signature]</i>				<u>\$ 1166.00</u>

All claims and returned items **MUST** be accompanied by this invoice.

Plaza Extra

0793

4C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No		Date		Phone	
Account Name		Nalley Howard		3/31/81	
Address					
SOLD BY	CASH	C.O.D.	CHECK	CHARGE	
QUAN	DESCRIPTION	PRICE	AMOUNT		
	Hours work	\$ 720.00			
	(winter)	\$ 250.00			
	Winter maintenance	\$ 970.00			
Received by <i>Walter Frensch</i>				449-1648	

All claims and returned items MUST be accompanied by this invoice.

DEFENDANTS' RESPONSE
 0112088

FY 004175

Plaza Extra

0894

4C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No. _____			Date: <u>3/3/01</u>		
Account Name: _____			Phone: _____		
Address: <u>Wally Hamed</u>					
SOLO BY	CASH	COO	CHECK	CHARGE	
QUAN	DESCRIPTION			PRICE	AMOUNT
					<u>1,248.00</u>
	<u>one thousand</u>				
	<u>two hundred forty eight</u>				
	<u>Rung A</u>				
					<u>1,248.00</u>
Received by _____			449-1673		

All claims and returned items MUST be accompanied by this invoice.

Plaza Extra 1202

4C & D Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No.		Date <u>4/9/01</u>			
Account Name <u>Wally Hamed</u>					
Address _____					
Phone _____					
SOLD BY		CASH	C.O.D.	CHECK	CHARGE
QUAN		DESCRIPTION		PRICE	AMOUNT
		<u>one thousand five hundred</u>		<u>\$</u>	<u>1500.00</u>
<u>449-1628</u>					
Received by <u>[Signature]</u>			<u>\$ 1500.00</u>		

All claims and returned items MUST be accompanied by this invoice

Plaza Extra 0989

4C & D Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No. _____ Date 5/8/01
Account Name Wally Hamed
Address _____

SOLD BY _____ CASH _____ C.O.D. _____ CHECK _____ CHARGE _____

QUAN	DESCRIPTION	PRICE	AMOUNT
	<u>Two Thousand</u>		<u>2,000.00</u>
	<u>Wally Hamed</u>		

449-0491

Received by _____ 2,000

All claims and returned items MUST be accompanied by this invoice.

Plaza ExtraSM 1000

4C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No. _____		Date <u>5/15/01</u>	
Account Name <u>Nelly Hamed</u>		Address _____	
SOLD BY _____		PHONE _____	
CASH	C.O.D.	CHECK	CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT
	<u>Three thousand</u>	<u>3,000.00</u>	
	<u>JAH</u>		
449-0493		<u>3,000.00</u>	
Received by _____			

All claims and returned items MUST be accompanied by this invoice.


DEFENDANTS' RESPONSE
 Q112095

FY 004182

Plaza Extra 2012

C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No		Date		6/11/12	
Account Name		Address		Phone	
Wally Hamer					
SOLD BY		CASH		CHECK	
DUAN		CODE		CHARGE	
DESCRIPTION		PRICE		AMOUNT	
Two thousand				2000.00	
 Received by		449-1661		2000.00	

All claims and returned items **MUST** be accompanied by this invoice

Plaza Extra 2014

4C & D Estate Sion Farm
 C'sted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 F'sted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No.		Date: 6/6/01	
Account Name: <i>Wally Hamed</i>			
Address:			
Phone:			
SOLD BY		CASH	COD
		CHECK	CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT
	<i>Six thousand</i>	<i>5375.00</i>	
	<i>Three hundred seventy five</i>		
	<i>Have</i>		
449-1631			
Received by: <i>[Signature]</i>			

All claims and returned items MUST be accompanied by this invoice

Plaza Extra 2022

4C & D Estate Slon Farm
 Csted. St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted. St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 749-1874

Purchase Order No.		Date	
Account Name		6/10/01	
Wally Hammece			
Address			
PROMP			
SOLD BY	CASH	COO	CHECR
			CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT
	Two Thousand		2000.00
Received by			449-0549
			2000.00

All claims and returned items MUST be accompanied by this invoice

Plaza Extra 2031

4C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No.		Date	
Account Name		6/18/01	
Address			
Phone			
SOLD BY	CASH	S.O.D.	CHECK
QUAN	DESCRIPTION	PRICE	AMOUNT
	Three thousand		
	849-0551		3,000 -
Received by			

All claims and returned items MUST be accompanied by this invoice.

DEFENDANTS' RESPONSE

0112102

FY 004189

Plaza Extra 2033

C & D Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No.		Date <u>6/19/01</u>		
Account Name <u>Wally Hammer</u>		Address		
Phone		Phone		
SOLD BY	CASH	C.O.D.	CHEQUE	CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT	
	<u>Three thousand</u>		<u>3000.00</u>	
449-0552			<u>3000.00</u>	
Received by <u>[Signature]</u>				

All claims and returned items MUST be accompanied by this invoice.

DEFENDANTS' RESPONSE

0112103

Plaza Extra 2034

C & D Estate Sion Farm
 C'sted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plassen
 F'sted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No. _____		Date <u>6/70/01</u>	
Account Name: <u>Jolly Hamedel</u>			
Address _____			
SOLD BY _____		CASH	C.O.D.
		CHECK	CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT
	<u>Three thousand</u>		<u>3500.00</u>
	<u>five hundred</u>		
Received by <u>[Signature]</u>		449-0553	<u>3500.00</u>

All claims and returned items MUST be accompanied by this invoice

Plaza Extra 2046

4C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00844
 Tel: (340) 719-1870
 Fax: (340) 719-1874

Purchase Order No. _____ Date 6/26/01
 Account Name Wally Hamed Phone _____
 Address _____ SOLD BY _____ CASH _____ C.O.D. _____ CHECK _____ CHARGE _____

QUAN	DESCRIPTION	PRICE	AMOUNT
			1500.00
	<i>Paul to house on 2nd floor</i>		
	<i>12/20/00</i>		
	<i>Wally Hamed</i>		
			1500.00

Received by _____ 449-1635

All claims and returned items **MUST** be accompanied by this invoice

Plaza Extra 2197

40 & D Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No. _____ Date 7/2/01
Account Name Wally Hamer
Address _____
SOLD BY _____ CASH _____ COO _____ CHECK _____ CHARGE _____
QUAN _____ DESCRIPTION Two thousand PRICE _____ AMOUNT 2000.00
449-0556
Received by [Signature] 2000.00
All claims and returned items MUST be accompanied by this invoice

Plaza Extra

1672

4C & D Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No		Date		Phone	
Account Name		Wally Homed			
Address					
SOLD BY		CASH	C.O.D.	CHECK	CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT		
	Three thousand	3000.00	3000.00		
	<i>[Signature]</i>				
Received by		449-1247		3000.00	

All claims and returned items MUST be accompanied by this invoice

Plaza Extra 2326

4C & D Estate Sion Farm
C'sted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
F'sted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No. _____ Date 7/17/01

Account Name _____

Address Wally Hamed Phone _____

QUAN	DESCRIPTION	CHARGE			AMOUNT
		CASH	C.O.D.	CHECK	
	<u>Auto Wash</u>				<u>2,500</u>

Received by _____ 449-1658

All claims and returned items **MUST** be accompanied by this invoice

Plaza Extra 2328

4C Estate Gion Farm
Fsted. St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted. St. Croix. V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No. _____ Date: 2/20/01
Account Name: Wally Namode
Address: _____ PHONE _____
CASH _____ COO _____ CHECK _____ CHARGE _____
SOLD BY _____ PRICE _____ AMOUNT 250.00
DESCRIPTION
Two thousand
four hundred
44
AA
449-1606
250.00
Received by _____
All claims and returned items MUST be accompanied by this invoice.

Plaza Extra 2347

4C & D Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Pleasen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No. _____ Date 5/6/01
Account Name Wally Hamed
Address _____
Phone _____
SOLD BY: CASH C.O.D. CHECK CHARGE
QUAN. DESCRIPTION PRICE AMOUNT
1 fourth house _____ 5000.00
[Signature]
[Signature]
449-0557 5000.00
Received by _____

All claims and returned items MUST be accompanied by this invoice

DEFENDANTS' RESPONSE
0112115

FY 004202

PLAZA EXTRA

C & D Estate Sion Farm
 C'sted, St. Croix, V.I. 00821
 Tel: (340) 778-8240
 Fax: (340) 778-1200

#14 Estate Plesson
 F'sted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

3553

Purchase Order No.		Date <u>8/8/01</u>			
Account Name <u>Wally Hameel</u>					
Address _____					
SOLD BY		CASH	COO	CHECK	CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT		
	<u>Five thousand</u>		<u>5000.00</u>		
<u>al-ff</u>					
			<u>5000.00</u>		
Received by _____		449-0560			

All claims and returned items MUST be accompanied by this invoice

DEFENDANTS' RESPONSE

0112117

FY 004204

PLAZA EXTRA

#14 Estate Sion Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-6240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874 2703

Purchase Order No.		Date	
Account Name		wally wamed	
Address		8/9/01	
PHONE		CHARGE	
CASH		COD	
CHECK		PRICE	
AMOUNT		2500.00	
DESCRIPTION		449-1644	
QUAN		2500.00	
Received by		[Signature]	

All claims and returned items MUST be accompanied by this invoice

PLAZA EXTRA

40 & D Estate Sion Farm
 St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Ploosen
 St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874 2775 1

Purchase Order No.		Date: 8/31/01	
Account Name: Wally Homed			
Address:			
Phone:			
SOLD BY	CASH	C.O.D.	CHECK
QUAN		DESCRIPTION	PRICE
			2500.00
Two thousand five hundred			
Handwritten signature			
			2500.00
Received by		849-1618	

All claims and returned items MUST be accompanied by this invoice.

PLAZA EXTRA

4C & D Estate Sion Farm
 Csted, St. Croix, V.I. 00821
 Tel: (340) 778-6240
 Fax: (340) 778-1200

#14 Estate Plessen
 Fsted, St. Croix, V.I. 00841
 Tel: (340) 719-1870
 Fax: (340) 719-1874

3576

Purchase Order No.		Date	
Account Name		9/7/01	
Address			
SOLD BY		CASH	COO
		CHECK	CHARGE
QTY	DESCRIPTION	PRICE	AMOUNT
	<i>Two thousand</i>		<i>2000.00</i>
<i>[Signature]</i>			
		<i>449-1619</i>	<i>2000.00</i>
Received by _____			

All claims and returned items MUST be accompanied by this invoice.

Plaza Extra 2050

4C & D Estate Sign Farm
Csted, St. Croix, V.I. 00821
Tel: (340) 778-5240
Fax: (340) 778-1200

#14 Estate Plessen
Fsted, St. Croix, V.I. 00841
Tel: (340) 719-1870
Fax: (340) 719-1874

Purchase Order No.		Date	
Account Name: <i>Wally Hameel</i>			
Address			
Phone			
SOLD*	CASH*	COO	CHECK
			CHARGE
QUAN	DESCRIPTION	PRICE	AMOUNT
	<i>Taxi to house and</i>		2000.00
			2000.00
Received by <i>[Signature]</i>			

449-1076

All claims and returned items MUST be accompanied by this invoice