

**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,
UNITED CORPORATION,)	AND DECLARATORY RELIEF
)	
Defendant.)	JURY TRIAL DEMANDED
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ANSWER TO COUNTERCLAIM

COMES NOW the Plaintiff by counsel and hereby answers the counterclaim as follows:

1. Neither admit nor deny as this is a legal conclusion to be determined by the Court.
2. Admit the lawsuit was filed, which speaks for itself. Otherwise deny.
3. Admit.
4. Admit that relief among others was sought.
5. Deny.
6. Admit.
7. Admit.
8. Admit there was a partnership between Hamed and Yusuf, but deny this allegation as worded as it contains alleged agreements that were never made.
9. Deny.
10. Deny.
11. Deny.

12. Deny the second sentence as worded, as Hamed lives on St. Croix and otherwise has no knowledge of the allegations in this sentence. Otherwise admit.

13. Deny.

14. Admit the letter was sent which speaks for itself, but otherwise deny.

15. Deny.

16. As alleged.

17. Deny.

18. Deny.

19. As alleged.

20. Deny.

21. Deny.

22. Deny.

23. Deny.

AFFIRMATIVE DEFENSES

Counterclaim Defendant Mohammad Hamed raises the following affirmative defenses to the counterclaim asserted against him:

1. Counterclaim Plaintiffs have failed to state a claim upon which relief can be granted.

2. Counterclaim Plaintiffs have unclean hands and are therefore not entitled to recover.

3. Counterclaim Defendant asserts the affirmative defense of estoppel.

4. Counterclaim Defendant asserts the affirmative defense of fraud (as an equitable defense.)

5. Counterclaim Defendant asserts the affirmative defense of unconscionability.

Dated: August 27, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2014 a true and accurate copy of the foregoing was served by email, as agreed by the parties, on:

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