

**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**

**MOTION TO SHOW CAUSE**

Today Fathi Yusuf has had United's Controller, John Gaffney, go into the Sage50 (formerly Peachtree) accounting system and alter it to permanently remove Wally Hamed from the payroll. See **Exhibit A**, Email from Wadda Charriez.

As the Court will recall, a prior motion to Show Cause was filed when:

the electronic transfer for payroll for the Plaza East store was not approved by Fathi Yusuf because he wanted to make a unilateral change (without an Order from this Court) by deleting Wally Hamed from the payroll. As such, while the payroll for the other two stores was processed and paid, none of the 200 employees for Plaza East were paid through the established electronic payroll. Hamed was asked about this and his counsel notified Yusuf's counsel that Hamed did not agree. . . .

Thereafter, the Special Master explicitly warned that unilateral changes such as this were contempt of Court. Now, in advance of the Proposed Plan, Yusuf has done it again and more seriously.

**Dated:** October 15, 2014



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### **CERTIFICATE OF SERVICE**

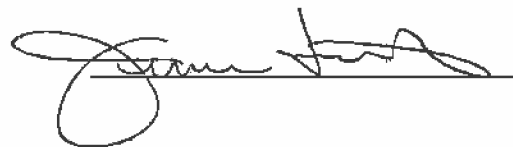
I hereby certify that on this 15<sup>th</sup> day of October, 2014, I served a copy of the foregoing by email, as agreed by the parties, on:

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A handwritten signature in black ink, appearing to read "Jeffrey Moorhead", is written over a horizontal line.

# EXHIBIT A

On Wednesday, October 15, 2014 11:10 AM, Plaza Extra  
<[plazaextra@yahoo.com](mailto:plazaextra@yahoo.com)> wrote:

Good Morning

Today for the last four weeks the same thing happen with the payroll. I doing my payroll Monday like always direct deposit and check with not changes I sent the direct deposit and notified Yusuf and mufeed for they approve. mufeed sent it and approved and when I coming Wednesday morning I realize the Direct Deposit still pending and an **Peachtree (Sage 50) the Direct Deposit Employees a change to checks and Waleed Hamed payroll is deleted from the system (Peachtree).**

Wadda Charriez

