

**IN THE SUPREME COURT OF THE VIRGIN ISLANDS**

FATHI YUSUF, )  
 )  
 Appellant, )  
 )  
 v. )  
 )  
 MOHAMMAD HAMED, WALEED )  
 HAMED, WAHEED HAMED, MUFEED )  
 HAMED, HISHAM HAMED, and )  
 PLESSEN ENTERPRISES, INC., )  
 )  
 Appellees. )  
 )  
 \_\_\_\_\_ )

**S. CT. CIV. NO. 2015-0009**

Re: Super. Ct. Civ. No. SX-12-CV-370

**RESPONSE TO NOTICE RE: STAY MOTION**

In response to appellee Mohammed Hamed’s Notice Re: Stay Motion representing that the inventory for Plaza Extra-West will not be completed before February 23, 2015, appellant Fathi Yusuf attaches an email dated February 18, 2015 from the company performing the inventory stating that “our crew will be finished tonight with all the inventory process.”

Respectfully Submitted,

**DUDLEY, TOPPER AND FEUERZEIG, LLP**

**DATED:** February 18, 2015

By: /s/Gregory H. Hodges  
 Gregory H. Hodges (VI Bar No. 174)  
 Stefan B. Herpel (VI Bar No.1019)  
 Law House  
 1000 Frederiksberg Gade  
 P.O. Box 756  
 St. Thomas, VI 00804  
 Telephone: (340) 774-4422  
 Facsimile: (340) 715-4400  
 E-Mail: [ghodges@dtflaw.com](mailto:ghodges@dtflaw.com)  
[sherpel@dtflaw.com](mailto:sherpel@dtflaw.com)

**DUDLEY, TOPPER  
AND FEUERZEIG, LLP**

1000 Frederiksberg Gade  
P.O. Box 756

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

(340) 774-4422

02/18/2015

VERONICA HANDY, ESQUIRE  
CLERK OF THE COURT

Fathi Yusuf v. Mohammad Hamed, et al.  
S. Civ. Civ. No. 2015-0009  
Re: Super. Ct. Civ. No. SX-12-CV-370  
Page 2

and

Nizar A. DeWood, Esq. (V.I. Bar No. 1177)  
The DeWood Law Firm  
2006 Eastern Suburbs, Suite 101  
Christiansted, VI 00830  
Telephone: (340) 773-3444  
Telefax: (888) 398-8428  
Email: [info@dewood-law.com](mailto:info@dewood-law.com)

Attorneys for Fathi Yusuf

**CERTIFICATE OF SERVICE**

I hereby certify that on February 18, 2015, I caused the foregoing **Response To Notice Re: Stay Motion** to be electronically filed with the Clerk of the Court using the V.I. Supreme Court e-filing system and that the attorneys listed below, who are Filing Users, will be e-served by the Notice of Electronic Filing:

Joel H. Holt, Esq.  
Law Offices of Joel H. Holt  
2132 Company Street  
Christiansted, V.I. 00820  
Email: [holtvi@aol.com](mailto:holtvi@aol.com)

Counsel for Plaintiff/Appellee  
Mohammad Hamed

Mark W. Eckard, Esq.  
Eckard, P.C.  
P.O. Box 24849  
Christiansted, VI 00824  
Email: [mark@markeckard.com](mailto:mark@markeckard.com)

Counsel for Counterclaim Defendants/Appellees  
Waleed Hamed, Mufeed Hamed, and Hisham  
Hamed

Carl J. Hartmann, III, Esq.  
5000 Estate Coakley Bay, #L-6  
Christiansted, VI 00820  
Email: [carl@carlhartmann.com](mailto:carl@carlhartmann.com)

Counsel for Counterclaim Defendant/Appellee  
Waheed Hamed

Jeffrey B.C. Moorhead, Esq.  
C.R.T. Building  
1132 King Street  
Christiansted, VI 00820  
Email: [jeffreymlaw@yahoo.com](mailto:jeffreymlaw@yahoo.com)

Counsel for Counterclaim Defendant/Appellee  
Plessen Enterprises, Inc.

/s/ Gregory H. Hodges

DUDLEY, TOPPER  
AND FEUERZEIG, LLP  
1000 Frederiksberg Gade  
P.O. Box 756  
St. Thomas, U.S. V.I. 00804-0756  
(340) 774-4422

02/18/2015

VERONICA HANBY-ECOWIDE  
CLERK OF THE COURT

**Gregory H. Hodges**

---

**From:** Yusuf Yusuf <ysquare\_88@yahoo.com>  
**Sent:** Wednesday, February 18, 2015 2:30 PM  
**To:** Gregory H. Hodges  
**Subject:** Fwd: Plaza extra inventory

Sent from my iPhone

Begin forwarded message:

**From:** "Romero, Yorlene" <YRomero@RGIS.com>  
**Date:** February 18, 2015 at 11:16:42 AM AST  
**To:** Mike Yusuf <mikifyusuf@yahoo.com>, 'Wally Hamed' <wallyhstx@yahoo.com>, "Hisham (Shawn) Hamed" <shawnhamed@yahoo.com>, "nejeh27@earthlink.net" <nejeh27@earthlink.net>, Yusuf Yusuf <ysquare\_88@yahoo.com>  
**Cc:** Dist114 <D114@RGIS.com>  
**Subject:** RE: Plaza extra inventory

Good morning to all of you, as planed our crew will be finished tonight with all the inventory process.

Please do not hesitate to contact us if you need any additional service or information.  
Thank you!

Yorlene Romero—  
District Manager  
District 114  
San Juan, PR  
S(787) 782-6950 Office  
( 787) 685-1108 Mobile  
7 (787) 273-7831 Fax  
[www.rgis.com](http://www.rgis.com)

¡El Trabajo en Equipo divide el esfuerzo y multiplica los resultados!

Note: The information in this email may be confidential and legally privileged. If you are not the intended recipient, you must not read, use or disseminate the information; please advise the sender immediately by reply email and delete this message and any attachments without retaining a copy. Although this email and any attachments are believed to be free of any virus or other defect that may affect any computer system into which it is received and opened, it is the responsibility of the recipient to ensure that it is virus free and no responsibility is accepted by RGIS, LLC for any loss or damage arising in any way from it use.