

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

YUSUF YUSUF, derivatively on behalf of
PLESSEN ENTERPRISES, INC.,

Plaintiff,

v.

**WALEED HAMED, WAHEED HAMED,
MUFEED HAMED, HISHAM HAMED**
and **FIVE-H HOLDINGS, INC.**,

Defendants,

and

PLESSEN ENTERPRISES, INC.,

Nominal Defendant.

Case No. SX-13-CV-120

**CIVIL ACTION FOR DAMAGES
AND INJUNCTIVE RELIEF**

JURY TRIAL DEMANDED

**DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO
COUNTS I, V AND VII OF PLAINTIFF'S COMPLAINT**

The Defendants hereby move for partial summary judgment pursuant to Rule 56 as to Counts I, V, and VII of the Complaint, which are the equitable counts in the Complaint, as there is an adequate remedy at law. The basis for the motion is more fully set forth in the memorandum being submitted in support of said motion, which is incorporated herein by reference. For the reasons set forth therein, it is respectfully submitted that the relief sought be granted.

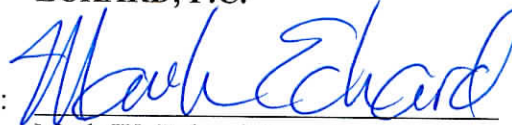
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Respectfully submitted,

ECKARD, P.C.

Dated: April 1, 2015

By:



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

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of April 2015, I served a copy of the foregoing document via email, as agreed by the parties, on the following person:

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