

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

**PLAINTIFF'S NOTICE OF OBJECTION TO LIQUIDATING PARTNER'S  
EIGHTH BI-MONTHLY REPORT**

The Liquidating Partner's Sixth Bi-Monthly Report, filed May 31, 2016, is once again filled with self-serving and inaccurate statements. As such, Hamed hereby submits a general objection to that report. In this regard, most of the report restates assertions from the prior seven bi-monthly reports. The Plaintiff incorporates his prior objections 1-7 thereto as filed with this Court previously.

The latest report has some further comments on the on-going accounting process. It should be noted that the Plaintiff's requests for even **the most basic accounting information** (such as cancelled checks, vendor invoices and operating bank statements) apparently **cannot be provided or will not be provided by the Liquidating Partner**. Moreover, the Liquidating Partner also objected to the manner in

which the Hamed CPAs sought to review the financials as being too onerous. Therefore, to avoid this burden and these issues, Plaintiff has agreed to do the “leg work” to get the 2012-present cancelled checks, vendor invoices and bank statements and review them independently – which is now being done.

While the partnership’s accountant, Mr. Gaffney, is no longer being asked for more documents, despite being paid to assist the Partnership on a full time basis, Hamed’s CPA’s have withdrawn the request for documents at this time and simply asked him to answer 130 very specific questions about the accounting methods and decisions. These (reduced) questions are required for a fundamental understanding of what decisions were made in generating the financials. It is estimated by the CPA’s that these will take less than 40 hours (of the 160+ hours per month Mr. Gaffney is being paid by the Partnership) since the questions no longer have any extensive document requests.

**Dated:** June 17, 2016



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**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of June, 2016, I served a copy of the foregoing by email, as agreed by the parties, on:

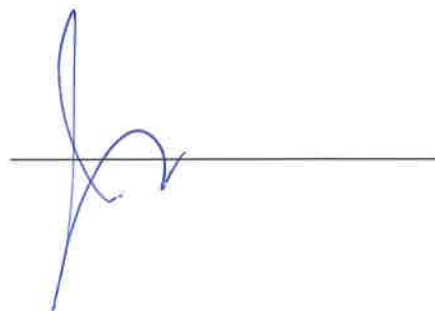
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A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be the name of the person who served the documents.