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

MOHAMMAD HAMED , by his authorized agent WALEED HAMED,	Case No.: SX-2012-cv-370
Plaintiff/Counterclaim Defendant,	
VS.	ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF
FATHI YUSUF and UNITED CORPORATION,	
Defendants and Counterclaimants.	JURY TRIAL DEMANDED
VS.	
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	
Counterclaim Defendants.	
MOHAMMAD HAMED,	Case No.: SX-2014-CV-278
Plaintiff, vs.	ACTION FOR DEBT AND
FATHI YUSUF,	CONVERSION JURY TRIAL DEMANDED
Defendant.	

PLAINTIFF'S MOTION TO STRIKE THE REPORT OF DEFENDANTS' ACCOUNTING EXPERT, BDO

The Plaintiff moves to strike expert opinion of the Defendants' accounting expert, BDO Puerto Rico, PSC ("BDO"), pursuant to FRED 702 as well as FRED 401 and 403. 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. Motion to Strike Defendants' Accounting Opinion Page 2

Dated: October 3, 2016

Jeel H. Holt, Esq. Counsel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street, Christiansted, VI 00820 Email: holtvi@aol.com Tele: (340) 773-8709 Fax: (340) 773-8677

Carl J. Hartmann III, Esq.

Co-Counsel for Plaintiff 5000 Estate Coakley Bay, L6 Christiansted, VI 00820 Email: carl@carlhartmann.com Tele: (340) 719-8941

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2016, I served a copy of the foregoing by email, as agreed by the parties, on:

Hon. Edgar Ross

Special Master % edgarrossjudge@hotmail.com

Gregory H. Hodges

Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 ghodges@dtflaw.com

Mark W. Eckard

HAMM Eckard, LLP 5030 Anchor Way Christiansted, VI 00820 mark@markeckard.com

Jeffrey B. C. Moorhead CRT Brow Building 1132 King Street, Suite 3 Christiansted, VI 00820 jeffreymlaw @yahoo.com