

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

MOHAMMAD HAMED, by his)
authorized agent WALEED HAMED,)
)
Plaintiff/Counterclaim Defendant,)
)
vs.)

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF
AND DECLARATORY RELIEF

FATHI YUSUF and UNITED CORPORATION,)
)
Defendants/Counterclaimants,)
)
vs.)

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SUPERIOR COURT

WALEED HAMED, WAHEED HAMED,)
MUFEEED HAMED, HISHAM HAMED, and)
PLESSEN ENTERPRISES, INC.,)
)
Additional Counterclaim Defendants.)

Consolidated With

MOHAMMAD HAMED,)
)
Plaintiff,)
v.)
UNITED CORPORATION,)
)
Defendant.)

CIVIL NO. SX-14-CV-287

ACTION FOR DAMAGES
AND DECLARATORY RELIEF

**REPLY MEMORANDUM OF LAW IN FURTHER SUPPORT OF MOTION
TO STRIKE "HAMED'S RESPONSE RE JURY ISSUES"**

Defendants/counterclaimants Fathi Yusuf and United Corporation (collectively, "Defendants") submit this reply memorandum of law in further support of their October 14, 2016, motion for an order striking the document filed by Plaintiffs and entitled "*Hamed's Response Re Jury Issues*" dated September 27, 2016, from the record.¹

¹ Citations in the form "Yusuf Mem." are to Defendants' *Motion to Strike* dated October 14, 2016. Citations in the form "Hamed Mem." are to *Hamed's Opposition to Defendants' Motion to Strike Hamed's 'Response Re Jury Issues'* dated October 18, 2016.

Plaintiffs' gift for misdirection is impressive. Rather than sticking to the subject matter of the instant motion (timeliness) that Plaintiffs' know they cannot win, Plaintiffs devote nearly their entire ten-page brief to additional arguments for denying Defendants' September 25, 2014, motion to strike their jury demand. Plaintiffs toss in some procedural arguments that nominally touch upon the issue of untimeliness, but they have no cogent answer concerning the implications of failing to oppose Defendants' September 25, 2014, motion until more than 700 days after the time for doing so had expired.

Plaintiffs' memorandum is nothing more than an impermissible second bite at the apple – one that fell from the tree more than 700 days ago.

Defendants would be justified in filing another motion to strike to rid Plaintiffs' papers of all arguments except as addressed to untimeliness, but these Dickensian games must end sometime. Instead, Defendants simply ask the Court to ignore Plaintiffs' new and out-of-place arguments about waiver and focus only on the small portion of Plaintiffs' brief (*i.e.*, Hamed Mem. at 2-4) that actually addresses the timeliness issue.

ARGUMENT

All Motion Practice Was Not "Stayed" By The Court

Plaintiffs contend that they did not oppose Defendants' September 25, 2014, motion to strike their jury demand because a general stay, including motion practice, had been ordered by the Court on October 7, 2014, that has not yet been lifted. (Hamed Mem. at 2.) Plaintiffs rely exclusively upon statements made by Defendants' counsel in a motion filed by Defendants on June 29, 2016, seeking emergency relief from certain subpoenas Plaintiffs had served upon third

party banking institutions around that time.² (*Id.* at 2-3.) In Defendants' motion papers their counsel Gregory Hodges does write that “[d]iscovery in this case has been stayed since October 7, 2014.” (*Id.* Exhibit 1 ¶ 1.)

Hodges' statement is accurate. Discovery had been stayed by the Court. But that is not relevant. A review of the transcript of the October 7, 2014, court conference at which the Court purportedly entered a stay confirms (1) *discovery* was stayed; but (2) only motions “ancillary to the primary focus” of the case “that are not primary, or that are not required to be addressed” were to be held in abeyance. (Exhibit A at 6-7 (transcript of 10/7/14 conference).) No doubt for this reason, Plaintiffs, through their counsel Joel Holt, filed motions on October 23, 2014 (two), October 28, 2014, March 16, 2015, and May 4, 2015. Plaintiffs also filed substantive responses to motions made by Defendants on October 24, 2014, and April 1, 2015, and notices of filing for various Rule 26 supplemental disclosures on April 9, 2015, and April 23, 2015. (Exhibit B (copy of docket for ST-12-CV-370).)

Clearly, if a general stay had been ordered, Plaintiffs themselves violated it repeatedly.

In any event, it is obvious that no stay of the type described by Plaintiffs was ever ordered by the Court.

From the amount of ink they spill on the subject, Plaintiffs clearly view Defendants' motion to strike their jury demand as “primary,” not “ancillary.” At least they do now. But Plaintiffs wake from their sleep over 700 days since the alarm clock rang. They missed the school bus.

² Defendants are curious as to why Plaintiffs served the subpoenas in 2016 if they truly believed the Court had imposed a stay in 2014. To cop Plaintiffs' own style (Hamed Mem. at 5), Defendants are “VERY” curious.

The best evidence that Plaintiffs' papers should be stricken? The fact that nowhere in Plaintiffs' memorandum – *nowhere* – do they address (or even acknowledge the existence of) LRCi 7.1(e)(1), Super. Ct. R. 9 and Super. Ct. R. 10(a)(2), the lynchpin of Defendants' argument. (Yusuf Mem. at 2-4.)³

Plaintiffs are no shrinking violets. That Plaintiffs stand mute on this key point speaks volumes.

Indeed, Plaintiffs' brief contains *no citations at all on the issue of timeliness*. No statutes. No cases. No court rules. Moreover, Plaintiffs make no attempt at all to distinguish any of the cases and court rules cited by Defendants in support of their motion to strike. (See Yusuf Mem. at 2-6.)

As Defendants explained in their principal memorandum, Plaintiffs' only escape from the consequences of their gross delay would involve proof of their "excusable neglect." (Yusuf Mem. at 4.) Plaintiffs, however, never even attempted to make such a showing. Small wonder, as Plaintiffs' mistaken belief (assuming *arguendo* they held one) that a general stay was in place would not constitute excusable neglect. See *Otoe County Nat. Bank v. W & P Trucking, Inc.*, 754 F.2d 881, 884 (10th Cir. 1985) (decided under "excusable neglect" provision in Fed. R. Civ. P. 60(b)). Nor did Plaintiffs move first for the Court's permission to file the offending document as required under LRCi 7.1(e)(1) and Super. Ct. R. 10(a)(2).

Plaintiffs' neglect is not excusable.

³ LRCi 7.1(e)(1) provides: "A party shall file a response within fourteen (14) days after service of the motion. For good cause shown, parties may be required to file a response and supporting documents, including brief, within such shorter period of time as the Court may specify, or may be given additional time upon request made to the Court." Super. Ct. R. 10(a)(2) provides: "On motion, permit the act to be done after the expiration of the specified period if the failure to act was the result of excusable neglect." Both are clearly cited throughout Defendants' memorandum.

As indicated above, the bulk of Plaintiffs' memorandum is devoted to new arguments about the law of jury trial waiver. (Hamed Mem. at 4-9.) The Court must reject them out of hand.

This issue has been fully briefed. Again, Defendants' motion was filed on September 29, 2014. Plaintiffs' opposition was filed on September 26, 2016, although it is cagily captioned "Hamed's Response Re Jury Issues." Defendants filed their reply on October 14, 2016.

That Plaintiffs' opposition memorandum should be stricken does not mean that Plaintiffs have a right to file a surreply. Pages 4 through 9 of Plaintiffs' October 18, 2016, memorandum are exactly that – an unauthorized surreply addressing an issue that the parties have already briefed in full.

Pursuant to LRCi 7.1(a), "[o]nly a motion, a response in opposition, and a reply may be served on counsel and filed with the Court; further response or reply may be made only by leave of Court obtained before filing," and the Court may sanction counsel for violation of this limitation. Unless prior leave is sought and granted, a party has no right to file a surreply. *See Pollara v. Chateau St. Croix, LLC*, 2016 WL 2865874, *8 (Super. Ct. May 3, 2016) (D. Brady, J.) ("Plaintiffs have not sought leave to file a surreply and have not filed any supplement to their Opposition. As such, the Court has a complete record of all information necessary to determine whether the gist of the action doctrine bars Plaintiffs' tort claims.").

Plaintiffs did not seek the Court's permission to file a surreply. Pages 4 through 9 of Plaintiffs' brief must be disregarded, in connection with both this motion and Defendants' September 2014 motion to strike.

CONCLUSION

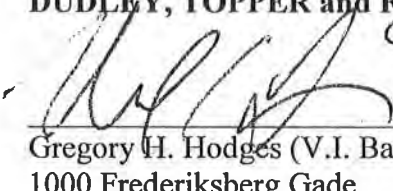
Defendants' motion to strike should be granted.

Respectfully submitted,

DUDLEY, TOPPER and FEUERZEIG, LLP

Dated: November 4, 2016

By:


Gregory H. Hodges (V.I. Bar No. 174)

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of November, 2016, I served the foregoing via e-mail addressed to:

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EXHIBIT A

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SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

MOHAMMAD HAMED, by his
authorized agent WALEED HAMED,

) CASE NO.:
)
) SX-2012-CV-0370

PLAINTIFF/COUNTERCLAIM DEFENDANT,

v.

FATHI YUSUF and
UNITED CORPORATION,

DEFENDANTS/COUNTERCLAIMANTS,

v.

WALEED HAMED, WAHEED HAMED,
MUFEEED HAMED, HISHAM HAMED,
and PLESSSEN ENTERPRISES, INC.,

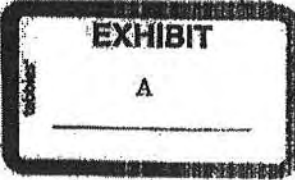
COUNTERCLAIM DEFENDANTS.

Tuesday, October 7, 2014

R.H. Amphlett Leader Justice Center
RR1 9000
Kingshill, St. Croix
U.S. Virgin Islands 00850

The above-entitled matter came on for a
telephonic **CIVIL STATUS CONFERENCE**, a hearing
before the Honorable Douglas A. Brady, Judge,
in Courtroom Number 211, commencing at 11:46 a.m.

Randall Jon Belsvik, FCRR
Official Court Reporter
(340) 778-9750, Ext. 7152



1 APPEARANCES

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3 On behalf of Mohammad Hamed:4 JOEL H. HOLT, ESQ.
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APPEARANCES (Continued)

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Mufeed Hamed and Hisham Hamed:

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On behalf of Plessen Enterprises, Inc.:

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Also present: Special Master Edgar Ross

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PROCEEDINGS

(Telephonic proceedings commence at 11:46 a.m.)

THE CLERK: Mohammed Hamed, et al. versus Fathi Yusuf and United Corporation., et al.

THE COURT: Good morning, gentlemen.

MR. HOLT: Good morning, Your Honor.

MR. HODGES: Good morning.

MR. ECKARD: Good morning, Judge.

THE COURT: Could you put your appearances on the record, please?

MR. HOLT: Joel Holt and Carl Hartmann for the plaintiff.

MR. HODGES: Gregory Hodges and Nizar Dewood for the defendants/counterclaimants.

MR. ECKARD: Mark Eckard for counterclaim defendants.

MR. MOORHEAD: Good morning, Your Honor. Jeffrey Moorhead on behalf of Plessen Enterprises, Inc.

THE COURT: Very well. We are here for a status conference. Master Edgar Ross is with me in the courtroom.

The first thing I'd like to say is that I'm not sure how it happened, but we've got a matter scheduled for this coming Thursday, October 9, and there's no need to have that hearing as well as what we're doing today, so that scheduled matter will be canceled.

1 To let the parties know, I will be issuing an order
2 granting the plaintiff's motion for partial summary judgement
3 as to the existence of a partnership. That shouldn't be any
4 surprise to anyone, since that conceded issue has led us to
5 where we stand today, but just to get that on the record,
6 I'll go ahead and issue an order in that regard.

7 I'm sorry that it took until this morning to get you
8 the document that was sent out by e-mail this morning
9 entitled Order Soliciting Comments, Objections and
10 Recommendations. I assume you've had a chance to take a look
11 at it.

12 The only things I think that are of significance and
13 different than what has been presented would be the
14 identification of Mr. Yusuf as a liquidating partner. Along
15 those lines, it's recognized that, as United's principal and
16 president, there are issues of conflict potentially, but
17 since that role is going to be under the supervision and with
18 the participation of the Master, I am confident that, to the
19 extent that those issues are not able to be resolved, that
20 the Master will be able to make sure that there are no
21 problems arising from any conflict between the interests of
22 United and the role of Mr. Yusuf as liquidating partner.

23 Of course, the other matters of significance in
24 there primarily would be the proposed manner in which each of
25 the three stores will be distributed from the partnership,

1 and the bottom line in this order sends the parties to work
2 with the Master immediately so that you can have an
3 opportunity to flesh out your concerns, and then requires
4 that each side submit a written response to this proposal
5 within 14 days from today. Yes, from today.

6 In order to allow the parties to -- and again, when
7 I talk about "the parties," Mr. Eckard and Mr. Moorhead, it's
8 not out of lack of respect for you guys, or having no
9 interest in your participation, but it's really plaintiff and
10 defendant who are the prime shakers and the movers here, and
11 I believe that all of the issues -- I am hopeful that all of
12 the issues as to the clients of Mr. Eckard and Mr. Moorhead,
13 being secondary to the primary parties, that those hopefully
14 can be folded into whatever resolution is going to be
15 accomplished.

16 But to allow focus on working on the details of the
17 plan, I'm going to stay discovery for the time being, subject
18 to any parties' suggestion that there is a need to reopen
19 discovery for any particular purpose, and we can do that, and
20 also subject to the recommendation of the Master, who will
21 hear any party who has a suggestion that a certain component
22 of discovery needs to be addressed presently.

23 But to allow focus on trying to look at the big
24 picture, and seeing if we can come up with a plan for going
25 forward, I'm going to stay discovery otherwise.

1 As everybody has seen, we haven't been proactive in
2 dealing with -- I lost count, but I would say it's accurate
3 to say dozens of pending motions, I don't know how many, but
4 there's a lot of motions out there that are ancillary to the
5 primary focus -- are you still there, gentlemen?

6 MR. HOLT: Yes, Your Honor.

7 THE COURT: Okay.

8 MR. HODGES: Yes, Your Honor.

9 THE COURT: Okay. We just had a power flash here.

10 So similar to the discovery, we are going to
11 continue to leave in abeyance those motions that are not
12 primary, or that are not required to be addressed, to come up
13 with a plan and a proposal for moving forward, and once
14 again, of course subject to any party indicating that there
15 is a need to address a particular motion, a particular issue,
16 and subject as well to the recommendation of the Master.

17 The order that you received this morning requires
18 that the parties meet together with the Master. And in
19 addition to taking a look at the plan, we will be -- I know
20 there are issues related to the rents that are due at Plaza
21 East, and that would be an issue that the parties need to
22 continue discussions with the Master concerning.

23 And the large portion of the work, it seems to me,
24 that is going to be taking place, is identifying and
25 cataloging partnership assets and forging a plan for the

1 liquidation or distribution of those assets. And all of that
2 can be done in the context of working with the Master
3 concerning putting together the nuts and bolts of the plan.

4 That's what I have this morning, and I'm willing
5 to -- I guess I should ask Judge Ross, is there anything
6 you'd like to add to that, Judge?

7 JUDGE ROSS: Nothing additional.

8 THE COURT: Can I hear from Mr. Hamed, what --

9 MR. HOLT: Yes, Your Honor, this is Joel Holt. Two
10 points, one simple one, and that is: You also have a status
11 conference set for Thanksgiving. I take it that is off?

12 THE COURT: We'll take it off.

13 MR. HOLT: All right. Secondly, I think while we're
14 all on the phone, maybe it might be helpful to try to set up
15 another meeting with Judge Ross, since he's going to be
16 taking over. I don't know if he wants to deal with this
17 after this, or if you want to talk about some time now.

18 THE COURT: Judge? Do you want to hear from
19 Judge Ross on that right now?

20 MR. HOLT: Yes, that would be fine.

21 JUDGE ROSS: Attorney Holt, this is Edgar Ross.
22 What I would suggest is that I get in touch with the
23 attorneys, and they find a suitable date and let me know,
24 because I'm always available. Some of you are private,
25 single practitioners, and I don't want to set a date that

1 interferes with your practice. So I would send you a notice
2 either today or tomorrow, asking you when you would like to
3 meet.

4 MR. HOLT: Okay. I think that's really all I have.
5 The parties did actually agree to a new scheduling order, but
6 I guess if you're suspending that too, that's a moot issue at
7 this point. So, Greg, I'll turn the floor -- Your Honor,
8 that's it for Hamed.

9 THE COURT: Thank you.

10 MR. HODGES: Thank you, Your Honor. This is Greg
11 Hodges. I really don't have anything to add. Obviously, I
12 think we'll need to review your order with our respective
13 clients, and get together with Attorney Holt and Judge Ross;
14 perhaps Attorney Holt initially, and then setting up a
15 meeting with Judge Ross at his convenience.

16 THE COURT: Okay, very good. And I -- you all
17 are -- I appreciate the degree to which everyone is willing
18 to accommodate each other, but now we do have a trial date of
19 December 1, for what that's worth, and I want to continue to
20 keep that date alive, and so I don't want to have us sitting
21 on these matters.

22 You can see in this order that you received this
23 morning, it requires comments within 14 days. I'd like to
24 try to stick to that, and that -- so that's going to
25 encourage you to get together with Judge Ross as soon as

1 you're able to do so. And as Judge Ross has said, he will
2 make himself available, and I'll just leave it to you to work
3 out those details.

4 MR. HOLT: All right, Your Honor. Thank you.

5 MR. HODGES: Your Honor, this is Greg Hodges. I
6 don't know if Judge Ross has had an opportunity to share with
7 you, but one of the unfortunately few things that Attorney
8 Holt and I agreed on recently was an extension of the
9 discovery period, the factual discovery period through
10 December 15, the expert initial report period until January
11 30, the rebuttal report until March 2nd I believe, and the
12 close of expert discovery until April 6. That was based on
13 the understanding that the trial date of December 1 was not
14 realistic under the circumstances.

15 Obviously, we don't control your docket, and those
16 were just suggestions that we were prepared to submit to the
17 Court, but I would respectfully submit that the, you know --
18 given the stay of discovery that you've talked about in this
19 conference, and the need for further discovery, that those
20 agreed dates ought to be favorably considered by the Court.

21 THE COURT: Has that been filed?

22 MR. HOLT: No.

23 MR. HODGES: I'm sorry?

24 MR. HOLT: No, we reached that agreement this
25 morning.

1 THE COURT: Well, why don't we -- I mean, I'm
2 amenable -- everybody has known for quite some time that
3 trial on December 1 is not realistic, but my interest here is
4 not so much doing anything other than trying to maintain
5 focus on the big picture and the end game, as opposed to
6 filling in the gaps along the sidelines.

7 It's also my intention not to stay discovery, with
8 the idea that this is going to prolong things. To the
9 contrary, the thinking is, is that if we can focus on the end
10 result, then perhaps some of the issues that are deemed
11 important now, and some of the discovery that's deemed
12 necessary now, may turn out not to be necessary.

13 As I said before, I'm open to any recommendation
14 from the Master, or motion from the parties, that the stay of
15 discovery is counterproductive, but, for the time being, at
16 least to give you all the opportunity to meet with Judge Ross
17 presently and the opportunity to get a response on the
18 proposed structure of the plan. For at least that period of
19 time, the discovery will be stayed. And as I said, I'm open
20 for discussion, suggestions as to how and if and when it
21 needs to be revisited.

22 Is there anything from Attorney Eckard or Attorney
23 Moorhead?

24 MR. ECKARD: Not from Attorney Eckard, Your Honor.

25 MR. MOORHEAD: No, Your Honor.

1 THE COURT: Very well. Attorney Holt, Attorney
2 Hodges, anything else we should be accomplishing this
3 morning?

4 MR. HOLT: No, Your Honor.

5 MR. HODGES: I don't think so, Your Honor. Thank
6 you for your time.

7 THE COURT: Okay, gentlemen. Thank you very much.
8 I appreciate your time this morning and look forward to
9 hearing from you shortly, and look forward to hearing good
10 reports about your meetings with Judge Ross.

11 That will conclude what we're going to do this
12 morning. Thank you.

13 MR. HOLT: Thank you, Your Honor.

14 MR. HODGES: Thank you, Your Honor.

15 (Proceedings conclude at 12:05)

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EXHIBIT B

SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX
CIVIL DOCKET

MOHAMMAD HAMED BY	Plaintiff)
HIS AUTH. AGENT)
WALEED HAMED)
Vs.)
)
UNITED CORPORATION)
)
	Defendant)

CASE NO: SX-2012-CV-0000370
FILING DATE: September 17, 2012
JUDGE: Hon. Douglas A. Brady
CASE TYPE: DAMAGES - CIVIL
SECONDARY null
PETITION

<u>PARTY NAME</u>	<u>LITIGANT</u>	<u>PARTY TYPE</u>
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MOHAMMAD HAMED BY HIS AUTH. AGENT WALEED HAMED ,	P001	PLAINTIFF
HOLT , JOEL H	P001	ATTORNEY FOR ANY OTHER PARTY
HARTMANN ESQ., CARL	P001	ATTORNEY FOR PLAINTIFF OR PETITIONER
UNITED CORPORATION ,	D002	DEFENDANT
DIRUZZO, III ESQ., JOSEPH A.	D002	ATTORNEY FOR DEFENDANT OR RESPONDENT
YUSUF , FATHI	D001	DEFENDANT

DOCKETS ENTERED ON THIS CASE:

<u>DOCKET DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
07/31/2015	LIQUIDATING PARTNER'S THIRD BI-MONTHLY REPORT; SUBMITTED BY GREGORY HODGES, ESQ. AND NIZAR DEWOOD, ESQ.	
07/06/2015	NOTICE OF ENTRY OF ORDER 07/02/2015 JOEL HOLT, ESQ. GREORY HODGES, ESQ. CARL HARTMANN, ESQ. EFFREY MOORHEAD, ESQ. NIZAR DEWOOD, ESQ. HON. EDGAR D. ROSS(EMAIL) MARK ECKARD, ESQ.	
07/02/2015	ORDER SIGNED THAT THE LIQUIDATING PARTNER, UNDER THE SUPERVISION OF THE MASTER, SHALL BE GRANTED ACCESS TO PLAZA EXTRA MERRILL LYNCH ACCOUNT (NO. 140-07759, IN THE NAME OF UNITED CORPORATION, SOLELY FOR PURPOSE CONSISTENT WITH WINDING UP THE HAMED-YUSEF PARTNERSHIP SIGNED BY JUDGE DOUGLAS A. BRADY	
07/01/2015	NOTICE OF ENTRY OF ORDER BY FIKISHA HARRIS 06/29/2015 JOEL HOLT, ESQ. CARL HARTMAN, ESQ. MARK ECKARD, ESQ. JEFFREY MOORHEAD, ESQ. NIZAR DEWOOD, ESQ.	
06/29/2015	MASTER'S ORDER RE CLOSING OUT ALL BANK ACCOUNTS AUTHORIZED BY THE HAMMED-YUSUF PARTNERSHIP IN BANCO POPULAR AND SOCTIABANK AND TRANSFERRING THE FUNDS THEREIN TO THE CLAIMS RESERVE ACCOUNT AS MANDATED BY THE LIQUIDATION ORDER HEREIN ENTERED BY THE COURT ON JANUARY 7, 2015; SIGNED BY JUDGE EDGAR D. ROSS	
06/05/2015	ORDER SIGNED BY JUDGE DOUGLAS A. BRADY; THAT PLAINTIFF'S MOTION AND MEMORANDUM IN SUPPORT OF MOTION FOR RECONSIDERATION OF PORTION OF RENT ORDER IS DENIED	
06/05/2015	NOTICE OF ENTRY OF ORDER 06/05/2015 JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ. NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ. MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ. HON. EDGAR ROSS(edgarrossjudge@hotmail.com)	
06/02/2015	LIQUIDATING PARTNER'S SECOND BI-MONTHLY REPORT SUBMITTED BY GREGORY HODGES, ESQ.	
* 05/18/2015	NOTICE OF FILING PLAINTIFF HAMED'S 13TH SUPPLEMENTAL RULE 26 INIDIAL DISCLOSURES RECEIVED ATTY JOEL H. HOLT	
* 05/12/2015	OPPOSITION TO MOTION FOR RECONSIDERATION OF PORTION OF RENT ORDER SUBMITTED BY GREGORY HODGES, ESQ.	
* 05/04/2015	PLAINTIFF'S MOTION AND MEMORANDUM IN SUPPORT OF MOTION FOR RECONSIDERATION OF PORTION OF RENT ORDER SUBMITTED BY HOEL HOLT, ESQ.	
05/04/2015	NOTICE OF ENTRY OF ORDER 04/30/2015 JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ.; NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.; MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.; HON. EDGAR ROSS (edgarrossjudge@hotmail.com)	

04/30/2015 NOTICE OF ENTRY OF ORDER
04/28/2015
JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ.;
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.;
MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.;
HON. EDGAR D. ROSS (edgarrossjudge@hotmail.com)
CASHIER

04/30/2015 MASTER'S ORDER REGARDING TRANSFER OF OWNERSHIP OF PLAZA EXTRA TUTU
PARK, ST. THOMAS SIGNED BY THE HONORABLE EDGAR D. ROSS, JUDICIAL
MASTER

04/29/2015 MOTION TO CLARIFY/MODIFY RELEASE OF PI BOND AND ORDER
SUBMITTED BY JOEL HOLT, ESQ.

04/28/2015 FILE RETURNED TO THE CLERK'S OFFICE

04/28/2015 NOTICE OF ENTRY OF ORDER
04/27/2015
JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ.
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.
MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.
HON. EDGAR D. ROSS (edgarrossjudge@hotmail.com)
CASHIER

04/28/2015 MASTER'S ORDER REGARDING BIDDING PROCEDURES FOR OWNERSHIP OF PLAZA
EXTRA-TUTU PARK SIGNED BY EDGAR D. ROSS, JUDICIAL MASTER

04/28/2015 NOTICE OF ENTRY OF ORDER
04/28/2015
JOEL H. HOLT, ESQ.; CARL HARTMANN III, ESQ.;
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.;
MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.;
HON. EDGAR D. ROSS (edgarrossjudge@hotmail.com)

04/28/2015 SECOND SUPPLEMENTAL ORDER RE RELEASE OF BOND SIGNED BY JUDGE DOUGLAS
A. BRADY

04/27/2015 MEMORANDUM OPINION AND ORDER SIGNED BY JUDGE DOUGLAS A. BRADY; THAT
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT IS DENIED, IN PART
, AS TO PLAINTIFF'S CLAIMS THAT THE STATUE OF LIMITATIONS PRECLUDES
DEFENDANT UNITED'S CLAIMS FOR PAST DUE RENT

04/27/2015 NOTICE OF ENTRY OF ORDER
04/27/2015
JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ.;
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.;
MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.;
HON. EDGAR ROSS (edgarrossjudge@hotmail.com);
JUDGES AND MAGISTRATES OF THE SUPERIOR COURT;
LAW CLERKS; LAW LIBRARY; IT; RECORD BOOK

04/27/2015 ORDER FOR DISCHARGE OF THE PRELIMINARY INJUNCTION BOND AND RELESE OF
PROPERTY AND CASH SECURING SAID BOND SIGNED BY JUDGE DOUGLAS A.
BRADY

04/27/2015 SUPPLEMENTAL ORDER RELEASING BOND SIGNED BY JUDGE DOUGLAS A. BRADY

* 04/23/2015 NOTICE OF FILING SUPPLEMENTAL RULE 26 DISCLOSURES
SUBMITTED BY JOEL HOLT, ESQ.

* 04/09/2015 NOTICE OF SUPPLEMENTATION OF THE RECORD
SUBMITTED BY JOEL HOLT, ESQ.

* 04/09/2015 PLAINTIFF HAMED'S SUPPLEMENTAL ULE 26 DISCLOSURES
SUBMITTED BY JOEL HOLT, ESQ.

* 04/09/2015 NOTICE OF FILING PLAINTIFF HAMED'S RULE 26 INITIAL DISCLOSURES
SUBMITTED BY JOEL HOLT, ESQ.

* 04/01/2015 REPLY TO OPPOSITION TO MOTION FOR RELEASE OF PI BOND
SUBMITTED BY JOEL HOLT, ESQ.

* 03/30/2015 OPPOSITION TO PLAINTIFF'S MOTION FOR RELEASE OF PI BOND ALONG WITH
LIQUIDATING PARTNER'S FIRST BI- MONTHLY REPORT; SUBMITTED BY
GREGORY H. HODGES, ESQ.

03/27/2015 MANDATE, OPINION OF THE COURT AND JUDGMENT RECEIVED FROM SUPREME
COURT

* 03/16/2015 MOTION AND M EMORANDUM FOR RELEASE OF PI BOND FILED BY JOEL HOLT
ALONG WITH A PROPOSED ORDER FOR DISCHARGE OF THE PRELIMINARY
INJUNCTION BOND AND RELEASE OF PROPERTY AND CASH SECURING SAID BOND

03/09/2015 NOTICE OF ENTRY OF ORDER
03/09/2015
JOEL HOLT, ESQ.; NIZAR DEWOOD, ESQ.;
MARK ECKARD, ESQ.; CARL HARTMANN III, ESQ.;
GREGORY HODGES, ESQ.; JEFFREY B.C. MOORHEAD, ESQ.;
HON. EDGAR ROSS (edgarrossjudge@hotmail.com)

03/06/2015 MASTER'S ORDER REGARDING TRANSFER OF OWNERSHIP OF PLAZA EAST
SIGNED BY EDGAR D. ROSS, JUDICIAL MASTER

03/05/2015 MASTER'S ORDER REGARDING TRANSFER OF OWNERSHIP OF PLAZA EXTRA WEST
SUBMITTED BY EDGAR D. ROSS, JUDICIAL MASTER

02/27/2015 ORDER DENYING STAY PENDING APPEAL SIGNED BY JUDGE DOUGLAS A BRADY

02/27/2015 NOTICE OF ENTRY OF ORDER BY FIKISHA HARRIS
02/27/2015
NIZAR DEWOOD, ESQ.
GREGORY H. HODGES, ESQ.
JOEL H. HOLT, ESQ.
CARL HARTMANN, III ESQ.
MARK W. ECKARD, ESQ.
JEFFREY B.C. MOORHEAD, ESQ.

02/27/2015 SUPREME COURT'S JUDGMENT AND OPINION OF THE COURT
RE: ORDERED THAT THE MOTION TO DISMISS IS GRANTED AND THAT THE
INSTANT APPEALS AND CROSS -APPEAL ARE DISMISSED FOR LACK OF
JURISDICTION;
ORDERED THAT THE MOTION FOR STAY PENDING APPEAL AND THE MOTION FOR
LEAVE TO EXCEED PAGE LIMITATION FOR PRINCIPAL AND REPLY BRIEFS ARE
DENIED AS MOOT;

02/23/2015 SUPREME COURT'S ORDER
RE: ORDERED THAT ON OR BEFORE 4:00 P.M. ON TUESDAY, FEBRUARY 24,
2015 APPELLANT SHALL FILE A RESPONSE TO APPELLEES' MOTION TO
DISMISS;

02/18/2015 STIPULATION RECEIVED, WITH CONSENT AND APPROVAL OF THE MASTER, TO
AMEND THE COURT'S ORDER ADOPTING FINAL WIND UP PLAN
SUBMITTED BY JOEL HOLT, ESQ. & NIZAR DEWOOD, ESQ.

02/13/2015 FILE FORWARDED TO JUDGE'S CHAMBER

02/10/2015 NOTICE OF INTENT TO SEEK A DETERMINATION FROM THE SUPREME COURT ON
MOTION FOR STAY OF PORTIONS OF JANUARY 7, 2015 ORDER PENDING APPEAL
BY DATE CERTAIN IF THE SUPERIOR COURT DOES NOT RESOLVE SUCH MOTION
SUBMITTED BY GREGORY HODGES, ESQ.

0.00

02/10/2015 REPLY TO HAMED'S OPPOSITION TO MOTION FOR STAY OF PORTIONS OF JANUARY 7, 2015 ORDER PENDING APPEAL SUBMITTED BY GREGORY HODGES, ESQ.

02/10/2015 REPLY TO PLESSSEN'S OPPOSITION TO YUSUF'S MOTION FOR STAY OF PORTIONS OF JANUARY 7, 2015 ORDER PENDING MOTION APPEAL GREGORY HODGES, ESQ.

02/09/2015 NOTICE OF SUPPLEMENTATION OF THE RECORD RE THE PENDING MOTION TO STAY SUBMITTED BY JOEL HOLT, ESQ.

02/06/2015 PLESSSEN'S OPPOSITION TO YUSUF'S MOTION TO STAY PART OF THE LIQUIDATION ORDER PENDING APPEAL RECEIVED; FILED BY JEFFREY B.C MOORHEAD, ESQ.

02/06/2015 REPLY TO PLESSSEN'S OPPOSITION TO YUSUF'S MOTION FOR STAY OF PORTIONS OF JANUARY 7, 2015 ORDER PENDING APPEAL SUBMITTED BY GREGORY HODGES, ESQ.

02/04/2015 CERTIFIED DOCKET FORWARDED TO THE SUPREME COURT OF THE VIRGIN ISLANDS, ORDERS

02/04/2015 HAMED'S OPPOSITION TO YUSUF'S JANUARY 29 TH MOTION TO STAY PART OF THE LIQUIDATION ORDER PENDING APPEAL SUBMITTED BY JOEL HOLT, ESQ.

02/02/2015 CERTIFIED DOCKET FORWARDED TO THE SUPREME COURT OF THE VIRGIN ISLANDS, ORDER AND INDEX

02/02/2015 NOTICE OF SUPPLEMENTATION OF THE RECORD SUBMITTED BY JOEL HOLT, ESQ.

01/30/2015 NOTICE OF VIDEO TAPED DEPOSITION

01/29/2015 FAHTI YUSUF'S MOTION TO STAY OF PORTIONS OF JANUARY 7, 2015 ORDER PENDING APPEAL, BRIEF IN SUPPORT OF MOTION FOR STAY OF PORTIONS OF JANUARY 7, 2015 ORDER PENDING APPEAL AND ORDER SUBMITTED BY GREGORY HODGES, ESQ.

01/29/2015 DOCKETING ORDER SIGNED SUBMITTED BY THE SUPREME COURT OF THE VIRGIN ISLANDS

01/28/2015 NOTICE OF APPEAL RECEIVED SUBMITTED BY THE SUPREME COURT OF THE VIRGIN ISLANDS

01/27/2015 ORDER APPROVING STIPULATION SIGNED BY JUDGE DOUGLAS A. BRADY

01/27/2015 NOTICE OF ENTRY OF ORDER
01/27/2014
JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ.;
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.;
MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.;
HON. EDGAR ROSS (edgarrossjudge@hotmail.com)

01/26/2015 STIPULATE, WITH THE CONSENT AND APPROVAL OF THE MASTER, TO AMEND THE COURT'S ORDER ADOPTING FINAL WIND UP PLAN AND ORDER SUBMITTED BY JOEL HOLT, ESQ. & NIZAR DEWOOD, ESQ.

01/26/2015 E-RECORD PREPARED AND SUBMITTED TO THE SUPREME COURT OF THE VIRGIN ISLANDS

01/13/2015 SCHEDULING ORDER SUBMITTED BY THE SUPREME COURT OF THE VIRGIN ISLANDS

01/12/2015 CERTIFIED DOCKET FORWARDED TO THE SUPREME COURT OF THE VIRGIN ISLANDS, ORDERS AND INDEX

01/09/2015 NOTICE OF ENTRY OF ORDER
01/07/2015
JOEL H. HOLT, ESQ.; CARL HARTMANN III, ESQ.;
NIZAR A. DEWOOD, ESQ.; GREGORY H. HODGES, ESQ.;
MARK W. ECKARD, ESQ.; JEFFREY B.C. MOORHEAD, ESQ.

01/07/2015 ORDER ADOPTING FINAL WIND UP PLAN SIGNED BY JUDGE DOUGLAS A. BRADY

01/07/2015 FINAL WIND UP PLAN OF THE PLAZA EXTRA PARTNERSHIP SIGNED BY JUDGE
DOUGLAS A. BRADY

01/05/2015 NOTICE OF APPEAL RECEIVED
SUBMITTED BY THE SUPREME COURT OF THE VIRGIN ISLANDS

01/05/2015 DOCKETING ORDER
SUBMITTED BY THE SPREME COURT OF THE VIRGIN ISLANDS

12/12/2014 NOTICE THAT THE CURRENT REGISTERED AGENT FOR PLESSSEN ENTERPRISES,
INC. IS JEFFREY MOORHEAD, ESQ.
SUBMITTE DBY JOEL HOLT, ESQ.

12/05/2014 MEMORANDUM OPINION AND ORDER SIGNED BY JUDGE DOUGLAS A. BRADY; THAT
DEFENDANT'S MOTION FOR RECONSIDERATION IS DENIED

12/05/2014 NOTICE OF ENTRY OF ORDER
12/05/2014
JOEL HOLT, ESQ.; CARL HARTMANN, ESQ.
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.
JEFFREY MOORHEAD, ESQ.; MARK ECKARD, ESQ.
HONORABLE EDGAR D. ROSS(edgarrossjudge@hotmail.com)
JUDGES AND MAGISTRATES OF THE SUPERIOR COURT
LAW CLERKS; LAW LIBRARY; IT; RECORD BOOK

11/07/2014 ORDER SIGNED BY JUDGE DOUGLAS A. BRADY; THAT PLAINTIFF'S RENEWED
MOTION FOR PARTIAL SUMMARY JUDGMENT AS TO THE EXISTENCE OF A
PARTNERSHIP IS GRANTED

11/07/2014 NOTICE OF ENTRY OF ORDER
11/07/2014
JOEL H. HOLT, ESQ.; CARL J. HARTMANN III, ESQ.;
NIZAR A. DEWOOD, ESQ.; GREGORY H. HODGES, ESQ.;
MARK W. ECKARD, ESQ.; JEFFREY B.C. MOORHEAD, ESQ.;
HON. EDGAR D. ROSS(edgarrossjudge@hotmail.com)

* 11/05/2014 DEFEDNANTS' RESPONSE IN OPPOSITION TO PLAINTIFF'S RENEWED MOTION TO
SHOW CAUSE DATED OCTOBER 23, 2014 AND MOTION TO SHOW CAUSE DATED
OCTOBER 28, 2014
SUBMITTED BY NIZAR DEWOOD, ESQ.

* 11/05/2014 NOTICE OF WITHDRAWAL OF ALL PRIOR MOTIONS TO SHOW CAUSE WITH ORDER
RE PENDING MOTIONS TO SHOW CAUSE
SUBMITTED BY: JOEL H. HOLT

10/29/2014 FATHI YUSUF'S RESPONSE TO HAMED'S COMMENTS CONCERNING THE COURT'S
PROPOSED WIND-UP PLAN WITH ATTACHMENTS FILED BY GREGORY H. HODGES,
ESQUIRE..

10/28/2014 PLAINTIFF HAMED'S RESPONSE TO DEFENDANT'S COMMENT RE PROPOSED
WINDING UP ORDER FILED BY ATTORNEY JOEL H. HOLT

* 10/28/2014 MOTION TO SHOW CAUSE AS TO ACCESS TO STORE INFORMATION AND
COMMUNICATION WITH EMPLOYEES/STAFF VENDORS FILED BY ATTORNEY JOEL
HOLT WITH EXHIBITS A TO D AND PROPOSED ORDER

10/28/2014 NOTICE OF FILING DOCUMENT IN THS OTHER DIVISION, FATHI YUSUF'S
RESPONSE TO HAMED'S COMMENTS CONCERNING THE COURT'S PROPOSED
WIND-UP PLAN
SUBMITTED BY GREGORY HODGES, ESQ.

10/24/2014 TRANSCRIPT FILED BY COURT REPORTER RANDALL JON BELSVIK FOR TELEPHONIC STATUS CONFERENCE HELD OCTOBER 7, 2014

* 10/24/2014 COUNTERCLAIM DEFENDANT WILLIE HAMED'S REPLY TO FATHI YUSUF'S OPPOSITION AS TO THE 10/15/2014 MOTION TO SHOW CAUSE FILED BY ATTORNEY CARL HARTMANN, III WITH EXHIBIT A

* 10/23/2014 FATHI YUSUF AND UNITED CORPORATION'S RESPONSES TO JOINT MOTION TO COMPEL FILED BY CHARLOTTE K. PERRELL, ESQ

* 10/23/2014 JOINT OPPOSITION OF PLAINTIFF AND THE HAMED COUNTERCLAIM DEFENDANTS TO DEFENDANTS' MOTIONS TO COMPEL SUBMITTED BY JOEL HOLT, ESQ.

* 10/23/2014 RENEWED MOTION TO SHOW CAUSE RECEIVED SUBMITTED BY JOEL HOLT, ESQ.

* 10/21/2014 DEFENDANT'S OPPOSITION TO MOTION TO SHOW CAUSE DATED OCTOBER 15, 2014 FILED BY ATTORNEY NIZAR WITH EXHIBIT A -DECLARATION OF J DEWOODOHN GAFFNEY

10/21/2014 FATHI YUSUF'S COMMENTS, OBJECTIONS AND RECOMMENDATIONS CONCERNING THE COURT'S PROPOSED PLAN FILED BY ATTORNEY GREGORY H. HODGES WITH EXHIBIT A-MAP

10/21/2014 PLAINTIFF HAMED'S COMMENTS RE PROPOSED WINDING UP ORDER SUBMITTED BY JOEL HOLT, ESQ.

* 10/15/2014 MOTION TO SHOW CAUSE RECEIVED SUBMITTED BY JOEL HOLT, ESQ.

* 10/08/2014 FATHI YUSUF'S REPLY BRIEF IN SUPPORT OF HIS MOTION FOR SUMMARY ORDER DIRECTING ELECTION OF PLESSEN DIRECTORS SUBMITTED BY GREGORY HODGES, ESQ.

10/07/2014 ORDER SOLICITING COMMENTS, OBJECTIONS AND RECOMMENDATIONS SIGNED BY JUDGE DOUGLAS A. BRADY

10/07/2014 NOTICE OF ENTRY OF ORDER
10/07/2014
JOEL HOLT, ESQ.; CARL HARTMANN III, ESQ.
NIZAR DEWOOD, ESQ.; GREGORY HODGES, ESQ.
MARK ECKARD, ESQ.; JEFFREY MOORHEAD, ESQ.
HON. EDGAR D. ROSS (edgarrossjudge@hotmail.com)

10/07/2014 NOTICE OF CANCELLATION OF VIDEOTAPED DEPOSITION OF WAHEED HAMED, MUFEED HAMED, HISHAM HAMED AND WALEED HAMED RECEIVED FROM ATTY. GREGORY HODGES

10/07/2014 RECORD OF PROCEEDING COMPLETED 0.00

10/06/2014 SUPPLEMENTAL REPLY TO OPPOSITION TO MOTION TO COMPEL RESPONSES TO DISCOVERY REQUESTS AND FOR SANCTIONS FILED BY CHARLETTE K. PERCELL, ESQUIRE.

10/06/2014 DEFENDANT FATHI YUSUF'S MOTION TO COMPEL RESPONSES TO DISCOVERY REQUESTS AND FOR SANCTIONS AS TO WAHEED HAMED AND PROPOSED ORDER FILED.

10/06/2014 DEFENDANT FATHI YUSUF'S MOTION TO COMPEL RESPONSES TO DISCOVERY REQUESTS AND FOR SANCTIONS AS TO MOHAMMAD HAMED AND WALEED HAMED AND PROPOSED ORDER FILED BY CHARLOTTE K. PERCELL, ESQUIRE.

10/06/2014 JOINT MOTION BY PLAINTIFF AND COUNTERCLAIM DEFENDANTS TO COMPEL RESPONSES TO DISCOVERY SUBMITTED BY JOEL HOLT, ESQ.

10/03/2014 NOTICE OF SERVICE OF DEFENDANTS' SUPPLEMENTAL RULE 26(a)(1)(A) DISCLOSURES
SUBMITTED BY CHARLOTTE PERRELL, ESQ.

10/03/2014 NOTICE OF SERVICE OF DEFENDANTS' OBJECTION AND RESPONSES TO COUNTERCLAIM DEFENDANT WAHEED HAMED'S ADDITIONAL REQUEST FOR THE PRODUCTION OF DOCUMENTS JOINTLY TO FATHI YUSUF AND UNITED CORPORATION
SUBMITTED BY CHARLOTTE PERRELL, ESQ.

10/01/2014 AMENDED NOTICE OF SERVICE OF DEFENDANTS' SUPPLEMENTAL RULE 26(a)(1)(A) DISCLOSURES
SUBMITTED BY CHARLOTTE PERRELL, ESQ.

10/01/2014 OPPOSITION TO MOTION TO SHOW CAUSE AND CROSS-MOTION FOR SIMILAR RELIEF GREGORY HODGES, ESQ.

09/30/2014 NOTICE OF SERVICE OF DEFENDANTS' SUPPLEMENTAL RULE 26(a)(1)(A) DISCLOSURES
SUBMITTED BY CHARLOTTE PERRELL, ESQ.

09/30/2014 EMERGENCY MOTION TO FURTHER EXTEND SCHEDULING ORDER DEADLINES AND ORDER
SUBMITTED BY GREGORY HODGES, ESQ.

09/30/2014 SUBPOENA DUCES TECUM RECEIVED ISSUED TO NEJAH YUSUF
SUBMITTED BY JOEL HOLT, ESQ.

09/30/2014 SUBPOENA DUCES TECUM RECEIVED ISSUED TO MAHER FATHI YUSUF
SUBMITTED BY JOEL HOLT, ESQ.

09/30/2014 SUBPOENA DUCES TECUM RECEIVED ISSUED TO YUSUF YUSUF
SUBMITTED BY JOEL HOLT, ESQ.

09/30/2014 NOTICE OF FILING AFFIDAVITS OF SERVICE OF SUBPOENA DUCES TECUM DIRECTED TO BPPR REGARDING ACCOUNTS OF MOHAMMAD HAMED; SUBPOENA DUCES TECUM DIRECTED TO BPPR REGARDING ACCOUNTS OF MUFEED HAMED; SUBPOENA DUCES TECUM DIRECTED TO BPPR REGARDING ACCOUNTS OF WALEED HAMED FILED BY CHARLOTTE K. PERCELL, ESQUIRE & NIZAR A. DEWOOD, ESQUIRE
ATTACHMENTS INCLUDED

09/30/2014 AFFIDAVIT OF SERVICE OF RENIX CHARLES OF TRUE COPY OF SUBPOENA DUCES TECUM OF SANADA HENRICKSON FOR CUSTODIAN OF RECORDS FOR RECORDS PERTAINING TO WALEED HAMED

09/30/2014 AFFIDAVIT OF SERVICE OF RENIX CHARLES OF A TRUE COPY OF SUBPOENA DUCES TECUM FOR SANADA HENRICKSON FOR CUSTODIAN OF RECORDS FOR RECORDS PERTAINING TO MOHAMMAD HAMED

09/30/2014 AFFIDAVIT OF SERVICE OF RENIX CHARLES OF A TRUE COPY OF THE SUBPOENA DUCES TECUM FOR SANADA HENRICKSON FOR CUSTODIAN OF RECORDS FOR RECORDS PERTAINING TO MUFEED HAMED

09/30/2014 PLAINTIFF MOHAMMAD HAMED'S NOTICE OF TENTH SUPPLEMENTAL RULE DISCLOSURES AND SUPPLEMENTAL RESPONSES TO DEFENDANTS' 11/15/13 DOCUMENT REQUESTS
SUBMITTED BY CARL HARTMANN III, ESQ.

09/30/2014 NOTICE OF COUNTERCLAIM DEFENDANT WAHEED HAMED'S SUPPLEMENTAL PRODUCTION OF DOCUMENTS
SUBMITTED BY CARL HARTMANN III, ESQ.

09/29/2014 MOTION TO STRIKE JURY DEMAND, MEMORANDUM IN SUPPORT OF MOTION TO STRIKE JURY DEMAND AND ORDER
SUBMITTED BY JUSTIN HOLCOMBE, ESQ.