

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**, **MUFEEED HAMED**,
HISHAM HAMED,
and **PLESSEN ENTERPRISES, INC.**,

Counterclaim Defendants.

MOHAMMAD HAMED,

Plaintiff,

vs.

UNITED CORPORATION,

Defendant.

MOHAMMAD HAMED,

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

CIVIL NO. SX-12-CV-370

**ACTION FOR DAMAGES
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

JURY TRIAL DEMANDED

Consolidated With

CIVIL NO. SX-I4-CY-287

**ACTION FOR DAMAGES
AND DECLARATORY
RELIEF**

CIVIL NO. SX-I4-CY-278

**ACTION FOR DEBT
AND CONVERSION**

JURY TRIAL DEMANDED

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

The *Liquidating Partner's Twelfth Bi-Monthly Report*, filed January 31, 2017, is once again filled with self-serving and inaccurate statements. As such, Hamed hereby submits a general objection to that report.

Much of the report restates assertions from reports 1-11 – Plaintiff incorporates his prior objections 1-11 herein.

Because requests for even the most basic information such as cancelled checks, vendor invoices and operating bank statements apparently cannot be provided/answered, Hamed also objects to the provided “financials” which are just Yusuf’s manipulated statements based on no disclosed backup documents.

Specifically, Hamed request details on the following listed financials:

A. Supporting documents for the following;

1/25/16 285 Other CRMVI LLC INV 4783 PD BY CRA F 5,088.97
1/25/16 286 Other CRMVI LLC INV 4984 PD BY CRA F 5,812.54
11/23/16 331 Withdrawal LEWIS CONSULTING LLC 3,800.00
12/6/16 333 Withdrawal LEWIS CONSULTING LLC 5,000.00
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0197 242.36
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0377 480.00
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0372 35.53
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0396 604.61
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0253 330.22
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0311 519.14
20000 Accounts Payable - Trade 3/11/16 41375V CDJ WE ARE WINE LLC -
Invoice: 0371 563.99
20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0377 480.00
20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0396 604.61
20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0372 35.53
20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0371 563.99
20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0311 519.14

20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0197 242.36
20000 Accounts Payable - Trade 3/11/16 CRA299 CDJ WE ARE WINE LLC -
Invoice: 0253 330.22

**B. Also all information regarding these payments to United Corp, Dudley
Topper**

28600 Pship Claims Reserve Clearing 1/1/16 Beginning Balance
28600 Pship Claims Reserve Clearing 1/27/16 CRA292 CDJ UNITED
CORPORATION 65,294.61
28600 Pship Claims Reserve Clearing 3/9/16 297 CDJ UNITED CORPORATION
66,559.67
28600 Pship Claims Reserve Clearing 4/1/16 302 CDJ UNITED CORPORATION
41,320.75
28600 Pship Claims Reserve Clearing 4/22/16 16-0422-01 PJ UNITED
CORPORATION - LUTHERAN FA M SVCS PMT REC'D BY UN1IT,2E4D6.
2E1AST FOR PE WEST
28600 Pship Claims Reserve Clearing 6/10/16 CRA312CM PJ UNITED
CORPORATION - REIMB APR & M AY AP AGING TOT 65,653.79
28600 Pship Claims Reserve Clearing 8/9/16 CM16-0719-01 PJ UNITED
CORPORATION - JONES SETTLE MENT VIA UNITED EAST5 C0K,0
0404.5080 TO COLIANNI
28600 Pship Claims Reserve Clearing 8/12/16 321CM PJ UNITED
CORPORATION - CRA REIMB PM T TO UNITED 71,280.75
28600 Pship Claims Reserve Clearing 8/30/16 16-0813-01CM PJ UNITED
CORPORATION - PAID BY WEST CRA CK 322 40.00
28600 Pship Claims Reserve Clearing 10/7/16 CM16-0930 PJ UNITED
CORPORATION - P'SHIP EAST S EP AP AGING PD BY WES6T0 ,C90R4A.49
28600 Pship Claims Reserve Clearing 11/23/16 CM16-1031 PJ UNITED
CORPORATION - CRA CHK 332 T O PAY AP BALANCE AT 1207/,3112/41.612
28600 Pship Claims Reserve Clearing Change 449,424.39

**C. Explanation of the following re General Liability Insurance (with refunds
coming in, why a \$50,000 expense for instance)**

63200 Insurance - Gen Liability 0.40 0.00 0.00 0.00 0.00 0.00 50,000.00 0.00
0.00 0.00 0.00 0.00 50,000.40
13100 Prepaid Insurance 1/28/16 JE28 GENJ INTER OCEAN 2015 REFUND
4,865.21
13100 Prepaid Insurance 1/28/16 JE28 GENJ INTER OCEAN 2015 REFUND
19,218.81
13100 Prepaid Insurance 1/28/16 JE28 GENJ INTER OCEAN 2015 REFUND
14,572.50
13100 Prepaid Insurance Change 38,656.92

D. More detail on the Legal Fees to Beckstedt & Associates

What cases are pending and what been settled, how much?

E. Explanation why contract labor was needed.

Contract Labor Expense 98,395.98 0.00 0.00 0.00 0.00 0.00 36,200.00 0.00 0.00
0.00 3,800.00 5,000.00 0.00 143,395.98

Finally, Hamed again disagrees with any payments to Yusuf or Gaffney which are not supported by time sheets or other proof of hours worked, and seeks recovery of those amounts.

Dated: February 13, 2017



Joel 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,
Unit L-6
Christiansted, VI 00820
Email: carl@carlhartmann.com
Tele: (340) 719-8941

CERTIFICATE OF SERVICE

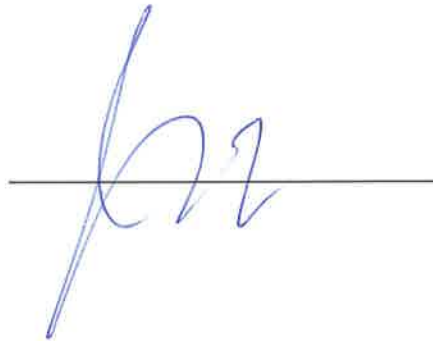
I hereby certify that on this 13th day of February, 2016, I served a copy of the foregoing by email, as agreed by the parties, on:

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

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be the initials 'JCM'.