

**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 and Counterclaimants.*

vs.

**WALEED HAMED, WAHEED HAMED,  
MUFEED HAMED, HISHAM HAMED, and  
PLESSEN ENTERPRISES, INC.,**

*Counterclaim Defendants,*

Case No.: SX-2012-cv-370

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

JURY TRIAL DEMANDED

**MOHAMMAD HAMED**,

*Plaintiff,*

vs.

**FATHI YUSUF**,

*Defendant.*

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND  
CONVERSION**

JURY TRIAL DEMANDED

**NOTICE AS TO ALICE KUO**

The Special Master has given notice of the retention of Alice Kuo as a law clerk in this matter. The Plaintiff received a December 13, 2017, motion from Yusuf to disqualify Joel Holt due to his hiring (with the Court's permission and full disclosure to opposing counsel) of a former law clerk. Out of an abundance of caution, the following

disclosure is made as to Alice Kuo, even though there is no rule requiring such disclosure.

As set forth in the *Declaration of Joel H. Holt, Esq.*, attached as **Exhibit 1**:

2. As per the attached IRS form 1099 with attachment, Alice Kuo did paralegal work for Joel Holt's firm in 2012.
3. At the time she was not a member of the USVI bar.
4. She was paid a total of \$3,755 for all work done, which was allocated to specific clients, as noted in the summary attached to the 1099.
5. Alice Kuo never worked on any issue regarding the Hamed cases, nor did the billings for the Hamed case begin until after she left working for me.
6. I have never discussed the Hamed cases or anything relating to them with Alice Kou.
7. I know of no basis for disqualifying Alice Kuo from participating in this matter.

Again, Plaintiff has agreed to her retention by the Special Master and knows of no reason that she should not fulfill those duties, but this filing is made to make sure there is full disclosure of her past work with my office.

**Dated:** December 14, 2017

  
\_\_\_\_\_  
**Joel H. Holt, Esq.**  
*Counsel for Plaintiff*  
Law Offices of Joel H. Holt  
2132 Company Street,  
Christiansted, VI 00820  
Email: joelholtpc@gmail.com  
Tele: (340) 773-8709  
Fax: (340) 773-8677

**Carl J. Hartmann III, Esq.**  
*Co-Counsel for Plaintiff*  
5000 Estate Coakley Bay, L-6  
Christiansted, VI 00820  
Email: carl@carlhartmann.com  
Tele: (340) 719-8941

**CERTIFICATE OF SERVICE**

I hereby certify that on this 14<sup>th</sup> day of December, 2017, 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**  
**Stefan Herpel**  
**Charlotte Perrell**  
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 positioned above a solid horizontal line. The signature is stylized and appears to be the initials 'JBC'.

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**DECLARATION OF JOEL H. HOLT**


I, Joel H. Holt, declare, pursuant to V.I. R. CIV. P. 84, as follows:

1. I am counsel for the Plaintiff and am personally familiar with the facts set forth herein.
2. As per the attached IRS form 1099 with attachment, Alice Kuo did paralegal work for Joel Holt's firm in 2012.
3. At the time she was not a member of the USVI bar.



4. She was paid a total of \$3,755 for all work done, which was allocated to specific clients, as noted in the summary attached to the 1099.
5. Alice Kuo never worked on any issue regarding the Hamed cases, nor did the billings for the Hamed case begin until after she left working for me.
6. I have never discussed the Hamed cases or anything relating to them with Alice Kou.
7. I know of no basis for disqualifying Alice Kuo from participating in this matter.

I declare under penalty of perjury that the foregoing is true and correct, executed on this 14<sup>th</sup> day of December, 2017.

  
\_\_\_\_\_  
Joel H. Holt

VOID  CORRECTED

PAYER'S name, street address, city, state, ZIP code, and telephone no.  Joel H. Holt, Esq. PC 2132 Company Street Christiansted, VI 00820		1 Rents \$	OMB No. 1545-0115  <b>2012</b>		<b>Miscellaneous Income</b>
		2 Royalties \$	Form <b>1099-MISC</b>		
		3 Other income \$	4 Federal income tax withheld \$	<b>Copy C For Payer</b>	
PAYER'S federal identification number  66-0666737	RECIPIENT'S identification number  614-42-3665	5 Fishing boat proceeds \$	6 Medical and health care payments \$		
RECIPIENT'S name  Alice Kuo		7 Nonemployee compensation  \$ 3,755.00	8 Substitute payments in lieu of dividends or interest \$	<b>For Privacy Act and Paperwork Reduction Act Notice, see the 2012 General Instructions for Certain Information Returns.</b>	
Street address (including apt. no.)  14660 Moon Crest Lane Unit E		9 Payer made direct sales of \$5,000 or more of consumer products to a buyer (recipient) for resale <input type="checkbox"/>	10 Crop insurance proceeds \$		
City, state, and ZIP code  Chino Hills, California 91709		11	12		
Account number (see instructions)	2nd TIN not <input type="checkbox"/>	13 Excess golden parachute payments \$	14 Gross proceeds paid to an attorney \$		
15a Section 409A deferrals \$	15b Section 409A income \$	16 State tax withheld \$	17 State/Payer's state no.	18 State income \$	

Form **1099-MISC**

Department of the Treasury - Internal Revenue Service

CenterMall  
JHH PC Operating Account

Num	Date	Payee	Memo	Category	Client	Amount
8472	2/8/2012	Alice Kuo		prof asst	xSickler-Diehl	(300.00)
8558	3/2/2012	Alice Kuo		prof asst	xClearview-mar...	(450.00)
8559	3/2/2012	Alice Kuo		prof asst	xSickler-Diehl	(50.00)
8559	3/2/2012	Alice Kuo		prof asst	xRiverhawk	(1,050.00)
8659	4/2/2012	Alice Kuo	legal research	prof asst	xCrawford #3	(300.00)
8659	4/2/2012	Alice Kuo	legal research	prof asst	xDefoe	(292.00)
8659	4/2/2012	Alice Kuo	legal research	prof asst	xSickler-Diehl	(313.00)
8684	4/13/2012	Alice Kuo	legal research	prof asst	xClearview-3/1...	(176.48)
8684	4/13/2012	Alice Kuo	legal research	prof asst	xSickler-Diehl	(411.76)
8684	4/13/2012	Alice Kuo	legal research	prof asst		(411.76)
<b>Grand Total</b>						<b>(3,755.00)</b>