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

WALEED HAMED, Plaintiff, vs.	Case No. SX-16-CV-429
BANK OF NOVA SCOTIA d/b/a	ACTION FOR DAMAGES
SCOTIABANK, FATHI YUSUF, MAHER YUSUF, YUSUF YUSUF, and UNITED CORPORATION,	JURY TRIAL DEMANDED
Defendants	

MOTION TO APPROVE STIPULATION FOR EXTENSION OF TIME

COMES NOW Defendant Bank of Nova Scotia, by and through its undersigned counsel, and requests that this Court approve the Joint Stipulation for Extension of Time in the above referenced matter. *See Exhibit A*, attached hereto.

Respectfully submitted,

Dated: March <u>13</u>, 2018

Charles E Lockwood, Esq. NICHOLS NEWMAN LOGAN GREY & LOCKWOOD, P.C. No. 1131 King Street, Suite 204 Christiansted, VI 00820-4971 Tel: 340-773-3200/Fax: 773-3409 *E-mail: clockwood@nicholsnewman.com*

Attorneys for Defendant BNS

Waleed Hamed v. Bank of Nova Scotia Case No. SX-16-CV 429 BNS' Motion Motion to Approve Joint Stipulation for Extension of Time Page 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that this document complies with the page or word limitation set forth in Rule 6-1(e).

I further certify that on March _____, 2018, I caused true and correct copies of the foregoing *Defendant BNS' Motion to Approve Joint Stipulation for Extension of Time, Joint Stipulation for Extension of Time, and proposed Order to be served on the following:*

Joel Holt, Esq. LAW OFFICES OF JOEL H. HOLT 2132 Company Street, Suite 2 Christiansted, VI 00820 Facsimile: 340-773-8677 *Counsel for Plaintiff* Gregory H. Hodges, Esq. Stephen Herpel, Esq. DUDLEY, TOPPER AND FEUERZEIG, LLP 1000 Frederiksberg Gade – PO Box 756 St. Thomas, VI 000804 Facsimile: 340-715-4400 E-mail: ghodges@dftlaw.com hherpel@dftlaw.com *Attorneys for Defendants Fathi Yusuf, Maher Yusuf, Yusuf Yusuf, and United Corporation*

Carl J. Hartmann, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 Facsimile: 212-202-3733 E-mail: carl@carlhartmann.com *Co-Counsel for Plaintiff*

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

WALEED HAMED,	CIVIL NO. SX-16-CV-429
Plaintiff,	ACTION FOR DAMAGES
VS.	
BANK OF NOVA SCOTIA, d/b/a SCOTIABANK, FATHI YUSUF, MAHER	JURY TRIAL DEMANDED
YUSUF, YUSUF YUSUF, and UNITED CORPORATION	

JOINT STIPULATION FOR EXTENSION OF TIME

Defendant.

COME NOW Plaintiff Waleed Hamed and Defendant BANK OF NOVA SCOTIA (BNS), by and through their undersigned counsel, and and in response to Plaintiff's March 5, 2018 Notice to the Court, hereby stipulate that Defendant BNS shall have an extension of time up to and including **Monday**, **April 9**, 2018 to respond to the discovery requests propounded by the Plaintiff, and that the Plaintiff will file his supplement to his previously filed Opposition to the BNS Motion to Dismiss within 21 days thereafter, or by **Monday**, **April 30**, 2018.

Dated: March 12, 2018

Charles E Lockwood, Esq. NICHOLS NEWMAN LOGAN GREY & LOCKWOOD, P.C. No. 1131 King Street, Suite 204 Christiansted, U.S. Virgin Islands 00820-4971 Tel: (340) 773-3200 Fax: (340) 773-3409 E-mail: clockwood@nicholsnewman.com Attorneys for Defendant BNS

Dated: March 7, 2018

Joel H. Holt, Esq. (Bar # 6) LAW OFFICES OF JOEL H. HOLT 2132 Company Street, Suite 2 Christiansted, VI 00820 Tel: (340) 778-8709 Fax: (340) 773-8677 E-mail: holtvi@aol.com Attorneys for Plaintiffs



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

WALEED HAMED,

vs.

Plaintiff,

BANK OF NOVA SCOTIA d/b/a SCOTIABANK, FATHI YUSUF, MAHER YUSUF, YUSUF YUSUF, and UNITED CORPORATION Case No. SX-16-CV-429

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

Defendants.

<u>O R D E R</u>

This matter is before the Court on the Joint Stipulation for Extension of Time for Defendant Bank of Nova Scotia ("BNS") to respond to discovery, and the Court being advised in the premises, it is hereby:

ORDERED that Defendant Bank of Nova Scotia's Motion to Approve Joint Stipulation

for Extension of Time is **GRANTED**; and it is further

ORDERED that Defendant BNS shall have through Monday, April 9, 2018 to respond to

the discovery propounded by Plaintiff; and it is further

ORDERED that Plaintiff may supplement his previously filed Opposition to the BNS

Motion to Dismiss by Monday, April 30, 2018.

SO ORDERED this _____ day of _____, 2018.

JUDGE OF THE SUPERIOR COURT

A T T E S T: ESTRELLA GEORGE Clerk of the Court

By: ____

Deputy Clerk

<u>Distribution</u>: Joel H. Holt, Esq. Carl J. Hartmann, Esq. Charles E. Lockwood, Esq. Gregory H. Hodges, Esq. Stephen Herpel, Esq.