

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

WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff/Counterclaim Defendant,)	CIVIL NO. SX-12-CV-370
v.)	
)	
FATHI YUSUF and UNITED CORPORATION,)	ACTION FOR INJUNCTIVE
)	RELIEF, DECLARATORY
Defendants/Counterclaimants,)	JUDGMENT, AND
v.)	PARTNERSHIP DISSOLUTION,
)	WIND UP, AND ACCOUNTING
)	
WALEED HAMED, WAHEED HAMED,)	
MUFEED HAMED, HISHAM HAMED, and)	
PLESSEN ENTERPRISES, INC.,)	
)	
<u>Additional Counterclaim Defendants.</u>)	Consolidated With
WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff,)	CIVIL NO. SX-14-CV-287
v.)	
)	
UNITED CORPORATION,)	ACTION FOR DAMAGES AND
)	DECLARATORY JUDGMENT
)	
<u>Defendant.</u>)	
WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff,)	CIVIL NO. SX-14-CV-278
v.)	
)	
FATHI YUSUF,)	ACTION FOR DEBT AND
)	CONVERSION
)	
<u>Defendant.</u>)	

**YUSUF'S RESPONSE TO HAMED'S MOTION TO COMPEL RELATING TO
CLAIM Y-12 – FOREIGN ACCOUNTS AND PROPERTIES**

Hamed's Motion to Compel Relating to Yusuf Claim Y-12 – Foreign Accounts and Properties is premised upon Yusuf's alleged failure to supplement additional discovery on or before December 18, 2018. Yusuf shows there are no grounds to compel:

- I. Yusuf has repeatedly provided information relating to Y-12 and Hamed's alleged "confusion" as to the nature of the Jordanian Property is feigned as Hamed is seeking to recover the exact same Jordanian Property in the companion case, *Hamed v. Yusuf, SX-12-CV-377*.**

Yusuf's Claim Y-12 has been set out and supporting documentation has been provided and supplemented on numerous occasions. First, Yusuf identified certain claims relating to foreign accounts and property in Jordan in his original filing of Yusuf's Accounting Claims and Proposed Distribution Plan dated September 30, 2016 ("Yusuf's Original Accounting Claim"). As to the Jordanian Properties, certain properties were to be transferred to Yusuf as a result of an agreement reached between Yusuf and Hamed. *See Exhibit 1 – Relevant Excerpts from Yusuf's Original Accounting Claim at pages 11-14.* Although most of the properties reflect joint ownership, two remaining properties did not. Yusuf identified those. Yusuf attached Exhibit N to Yusuf's Original Accounting Claim (Exhibit 1), which is a Land Value Estimation that specifically identified the properties at issue. *See Exhibit 1 - Exhibit N – Land Value Estimation.* As to the land identified in Exhibit N, Yusuf sought "an Order requiring the Executor/Administrator of Hamed's estate to take such action as may be necessary to properly reflect Yusuf's joint ownership of these parcels." *See Exhibit 1, p. 13.* Yusuf also attached Exhibit O to Yusuf's Original Accounting Claim, the written agreement reached between himself and Hamed. *See Exhibit 1 - Exhibit O – the Written Agreement in Arabic.* Yusuf noted that he would supplement Exhibit O with an English translation as soon as it was received.

Next, on December 7, 2016, Yusuf filed his Supplementation of Yusuf's Accounting Claims and Proposed Distribution Plan. *See Exhibit 2 – December 7, 2016 Supplementation.* Attached to Yusuf's December 7, 2016 Supplementation, Yusuf provided Exhibit R to his claims relating to the Jordanian Properties entitled "Payment Analysis" setting forth the values and payments as well as their exchange rates. *See Exhibit 2 – Exhibit R – Payment Analysis.* At the same time, Yusuf provided Exhibit S, which was the English translation of his earlier filed Exhibit O. *See Exhibit 2 – Exhibit S – English Translation of Written Agreement.* Further, Yusuf also attached Exhibit T, which contained the English and Arabic versions of the invoices described in the Payment Analysis. *See Exhibit 2 – Exhibit T – English and Arabic Invoices reflected in the Payment Analysis.*

Shortly thereafter, on December 12, 2016, Yusuf filed his Amended Supplementation of Yusuf's Accounting Claims and Proposed Distribution Plan. *See Exhibit 3 – December 12, 2016 Amended Supplement.* Therein, Yusuf clarified certain expenses that he was seeking.

Subsequently, Judge Brady issued his Limitation Order, which restricted the scope of the partnership claims to those occurring after September 17, 2006. As a result, the parties then provided revised claims to reflect this limitation. On October 30, 2017, Yusuf submitted his Amended Accounting Claims Limited to Transactions Occurring On or After September 17, 2006. *See Exhibit 4 – Relevant Excerpts of October 30, 2017 Amended Claims.* Yusuf again identified his claims as to the Jordanian Properties as well as certain foreign accounts but then noted that claims (c) through (e) were no longer available given the Limitation Order.

In response to the discovery submitted by Hamed, Yusuf objected to the compound nature of the requests but, nonetheless, incorporated by reference, the detailed information already provided to Hamed on various occasions. Thereafter, counsel for the parties engaged in

an extensive Rule 37 conference on November 12, 2018, lasting a few hours.¹ During that conference, counsel for Yusuf maintained certain objections as to various discovery but, as to others, advised that if additional information was available, it would be provided on or before December 15, 2018.² To be clear, counsel for both parties acknowledge that neither party was “sitting” on information or documents that had not previously been provided to the other and there can be no doubt that the information exchanged between the parties has been extensive and the documents exchanged voluminous. The representation of counsel for Yusuf that “there would be supplementation” was a representation that to the extent there was anything to supplement, Yusuf would do it on or before that mid-December timeframe. Hence, there are no additional documents of which Yusuf is aware that have not otherwise already been disclosed and hence, nothing further to compel. On December 18, 2018, no further supplementation was provided as to claims Y-12.

Hamed protests loudly that the claim Y-12 “has ZERO specificity” and is “a wild, undefined mish-mash” regarding “unspecified real property” that he cannot “fathom” because “it is very unclear.” See Hamed Motion to Compel, p. 2 and 4. However, Hamed knows exactly the Jordanian Property at issue because Hamed has made claims to the same property in the companion case, *Hamed v. Yusuf*, SX-12-cv-377. See **Exhibit 5** – Relevant Excerpts from Hamed’s Third Amended Complaint, *Hamed v. Yusuf*, SX-12-cv-377. By way of example, Hamed sets forth his claims to this Jordanian property, the basis for the transfer and the current disagreement³:

¹ This was the second Rule 37 conference. The first took place on November 2, 2018 relating to other discovery issues.

² The parties had originally agreed to December 15, 2018 but then, later agreed to December 18, 2018.

³ Yusuf notes that he disputes the allegations in Exhibit 5 and references it to demonstrate simply that it relates to the same Jordanian property, not as an acknowledgment or agreement with Hamed’s allegations.

- 43. Plaintiffs pointed out to Fathi Yusuf that the Hamed family had transferred the property in Jordan that was worth in excess of ten million dollars in reliance on Fathi Yusuf's representations that if the transfer would stop all the slander and defamation and dissension between the families and the threats of physical harm.
- 44. Defendant Fathi Yusuf then falsely stated in 2011 that the transfer was only for

...

- 143. The actions of Defendant, Fathi Yusuf, constitute misrepresentation, tortuous misrepresentation, fraudulent misrepresentation and fraud and coercion to include but not be limited to; Defendant Fathi Yusuf had no intention of stopping his threats and defamation if the Jordan property was transferred to him and the Plaintiff, Mohammad Hamed, transferred the property to Fathi Yusuf to stop the defamation and threats to kill him and his sons.

...

- 145. As a result Plaintiffs have suffered damages as alleged as well as loss of the property in Jordan that should be conveyed back to Plaintiff Mohammad Hamed.

...

- 153. Defendant Fathi Yusuf agreed to stop the defamation and threats if the Jordan property was transferred.
- 154. Defendant Fathi Yusuf breached the contract and continued defaming and threatening Plaintiffs despite receiving the property.
- 155. As such Plaintiff, Estate of Mohammed Hamed is entitled to return of the property or its value.

See Exhibit 5 – Relevant Excerpts from Hamed's Third Amended Complaint, Hamed v. Yusuf, SX-12-cv-377 (emphasis added). Hence, Hamed clearly knows the specifics of the Jordanian

Property which is at issue between the parties because Hamed is seeking a return of that same property. Hamed has even quantified the alleged value of this property and acknowledged the fact that there was an agreement associated with the transfer (Yusuf also alleged that the transfer was as a result of an agreement between himself and Hamed). Yusuf shows that he has provided discovery on several occasions as set forth above (which are attached as Exhibits 1-4) and has produced sufficient supporting documentation. Hamed is more than aware of the facts and circumstances giving rise to this claim—Hamed is making a claim to the exact same property as a result of the exact same circumstances which resulted in the transfer. Thus, the information is equally known by Hamed. Hence, there is no basis for a motion to compel.

II. There was no attempt to avoid a Rule 37 Conference or ignore counsel and the missed meeting was not a reflection of a failure to cooperate or a need to be compelled to otherwise respond.

As the Master is aware, counsel for the parties have engaged in numerous weekly (or bi-weekly meetings), which have resulted in the resolution of a significant number of claims. In addition, these regular communications have resulted in cooperation and shifting of discovery relating to certain claims to John Gaffney for his response and input as the person with the most knowledge on various open questions. The parties also have agreed to shift the timing relating to certain claims pending Gaffney's responses. At the same time, counsel for the parties engaged in extensive Rule 37 conferences, which took place on November 2, 2018 and November 12, 2018. During those conferences, the parties discussed supplementation of documents relating to certain discovery, if any additional information could be located.

Regarding the allegation that counsel ignored the timeframe set for yet another Rule 37 conference the latter part of December, counsel for Yusuf shows two things:

a) Counsel for Yusuf did not anticipate that the meeting would be considered a Rule 37 conference, but instead, understood it to be another weekly meeting. Counsel for the parties had been participating in a standing meeting every week or every other week to continue to work together to resolve open and outstanding issues. Typically, these meetings have been scheduled for Fridays—although sometimes they were set for Thursdays, if there was scheduling conflict.

b) Counsel for Yusuf mis-calendared the meeting and understood it to be on the following day, Friday, December 20, 2018 (as this had been the typical practice to meet on Fridays). Hence, when the meeting was supposed to occur on December 19, 2018 (a Thursday), counsel for Yusuf was in another meeting and did not recognize the mistake. Counsel for Yusuf immediately upon learning of the issue, communicated the error in scheduling and offered to meet again, if needed, on Friday, December 20. Counsel for Hamed declined and advised that they would be proceeding with a motion to compel.

Hence, counsel for Yusuf clarifies that the failure to meet was not an attempt to ignore opposing counsel. Rather, counsel have spent significant time working together and cooperating to move the matter forward. This has included discussions as to discovery concerns and these communications have been open and respectful. The fact that no further discovery was submitted on this issue (Y-12), when discovery was supplemented as to other issues on December 18, 2018, is not a reflection of a failure to cooperate or a need to be compelled to otherwise respond and the failure to attend the meeting was a function of a calendaring error, not avoidance.

Conclusion

There is no basis to compel further discovery as to Yusuf Claim Y-12 as the information provided by Yusuf has been sufficient and the information relating to the Jordanian Property is equally known to Hamed (as Hamed is making as claim as to the same property).

Respectfully submitted,

DUDLEY, TOPPER AND FEUERZEIG, LLP

DATED: December 30, 2018

By: 

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Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of December, 2018, I caused the foregoing **Yusuf's Opposition to Hamed's Motion to Compel Relating to Yusuf Claim Y-12 – Foreign Accounts and Properties**, which complies with the page and word limitations of Rule 6-1(e), to be served upon the following via the Case Anywhere docketing system:

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U.S. Virgin Islands 00851

Alice Kuo
5000 Estate Southgate
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U.S. Virgin Islands 00820

A handwritten signature in black ink, appearing to read 'Alice Kuo', written over a horizontal line.

Exhibit Index

- Exhibit 1** Relevant Excerpts from Yusuf's Original Accounting Claim at pages 11-14.
Exhibit N – Land Value Estimation
Exhibit O – the Written Agreement in Arabic
- Exhibit 2** December 7, 2016 Supplementation
Exhibit R – Payment Analysis
Exhibit S – English Translation of Written Agreement
Exhibit T – English and Arabic Invoices reflected in the Payment Analysis
- Exhibit 3** December 12, 2016 Amended Supplement
- Exhibit 4** Relevant Excerpts of October 30, 2017 Amended Claims
- Exhibit 5** Relevant Excerpts from Hamed's Third Amended Complaint, *Hamed v. Yusuf*, SX-12-cv-377

Exhibit 1

V. Y&S and R&F Stock Sale Proceeds Distribution

The Partnership invested in various entities used to purchase either stock or real estate. One such entity was Y&S. The Partners invested Partnership funds through two of their sons, Hisham Hamed and Nejeih Yusuf. The two sons sold their stock for \$900,000, pursuant to an agreement dated January 15, 2000 with Hakima Salem. Rather than receiving the proceeds, the two sons directed that the funds be paid to Yusuf, who was to be the nominee of the sales proceeds and, thus, custodian of the funds. The funds were not paid in a lump sum, but rather periodically and often late. Yusuf has received all of the proceeds from the sale of the stock. Although claims to these funds were the subject of a separate suit (Hamed v. Yusuf, Superior Court of St. Croix, SX-2014-CV-278), the parties stipulated to have these claims¹³ consolidated into this case and incorporated into the Partnership accounting and distribution. As a result of various adjustments reflected on Exhibit 1 to the complaint in SX-2014-CV-278, \$802,966¹⁴ should be allocated to Hamed to equalize the Partnership distribution between the Partners resulting from the sale of the stock of Y&S and R&F.

→ **VI. Foreign Accounts and Jordanian Properties**

As part of the profit sharing arrangement between the Partners, at various points in time, profits of the Partnership were sent to Jordan to be held in bank accounts or invested in real property to the mutual benefit of the Partners. In addition, Partnership profits were also sent to

¹³ Although no claims have ever been pled in this case or SX-2014-CV-278 concerning the \$600,000 in proceeds from Yusuf's sale of his 1,000 shares of stock in R&F pursuant to an agreement dated January 15, 2001 with Hakima Salem, Yusuf is prepared to include these proceeds in his accounting.

¹⁴ Interest was not included on this claim because, among other things, United did not include all the interest it could claim on the rent actually awarded by the Rent Order. See n. 11, above. There are additional reasons for not paying interest on the claim as reflected in Yusuf's First Amended Answer And Counterclaim filed in SX-2014-CV-278. See also n. 15, below, regarding \$150,000 offset.

Jordan to be used as charitable donations of the Partners. Based upon Yusuf's review of bank documentation available to date and information discovered following the FBI raid, Yusuf claims that Hamed (either individually or through his sons or agents) failed to properly invest all Partnership funds with which he had been entrusted and failed to properly account for such funds. As a result, Hamed either breached his fiduciary duties to the Partnership by failing to properly safeguard, account for, and invest these funds as agreed between the Partners or he converted them for his own personal use or the personal use of his family members.

Yusuf has repeatedly raised these claims with Hamed and his agent, Waleed Hamed, but has received either unsatisfactory or no responses to questions as to how the funds were spent. The misappropriations or failures to account by Hamed and his agents of which Yusuf is presently aware include:

- a. Hamed and his sons have failed to account for the Partnership funds held in various foreign bank accounts from 1996 to date including, but not limited to, the accounts identified in **Exhibit K**;
- b. Because Hamed converted \$150,000 previously delivered as a charitable donation for a batch plant in West Bank, his interest in the Partnership should be charged for the transfer of \$150,000.00 to the Bank of Palestine to make good on the original donation; *see* **Exhibit L**, Wire Transfer Information Supporting Claim.¹⁵

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¹⁵ This payment was made on behalf of the purchaser of the Y&S and R&F stock and represented a portion of the proceeds of the sale of that stock. Accordingly, the amount should either be offset against the \$802,966 allocated to Hamed in § V, above, or it should be charged against Hamed's interest in the Partnership. Given Hamed's apparent negative balance in his Partnership account, Yusuf submits the \$150,000 should be offset against the \$802,966.

- c. Waleed Hamed's unauthorized check of \$536,405 to Hamed on April 29, 1998 and additional checks for \$10,000 and \$15,216; *see Exhibit M.*
- d. Waleed Hamed's failure to account for funds that were removed from the Commercial Francaise Bank in Saint Maarten with four (4) checks totaling \$550,373.14 to close out the account in January and February of 1997; and
- e. Waleed Hamed's conversion of \$1.4 million received in 1996 as reflected in a St. Maarten police report.

Approximately forty (40) parcels of real property were purchased in Jordan using funds from the Plaza Extra Stores. All but two of those properties were jointly titled in the names of Hamed and Yusuf. The Court's assistance in administering or liquidating the jointly titled parcels is not sought at this time. Yusuf does seek the Court's assistance, however, with respect to two (2) parcels that were incorrectly titled in Hamed's name alone. These two parcels are identified in the "Land Value Estimation" attached as **Exhibit N**. Yusuf respectfully requests an Order requiring the Executor/Administrator of Hamed's estate to take such action as may be necessary to properly reflect Yusuf's joint ownership of these parcels.

Hamed's interest in another parcel that was purchased in Jordan using funds from the Plaza Extra Stores has already been conveyed to Yusuf as part of Hamed's efforts to appease Yusuf following his discovery of the misappropriation of \$2,000,000 sent to Hamed from St. Maarten in or around 1997. A copy of the agreement in Arabic conveying Hamed's interest in such parcel is attached as **Exhibit O**¹⁶. Yusuf had agreed to resolve this misappropriation, but not any others that Yusuf might later discover, by the conveyance of Hamed's interest in two parcels,

¹⁶ Yusuf is arranging for this document to be translated. An English version will be provided to the Master and counsel upon receipt.

one in Jordan that is the subject of Exhibit N, and one half acre parcel in St. Thomas, previously titled in the name of Plessen Enterprises, Inc., which is addressed in a number of the Liquidating Partner's Bi-Monthly Reports. See Ninth Bi-Monthly Report at p. 5-6. Yusuf insisted that if Hamed wanted a resolution addressing all Hamed misappropriations, whether known or unknown, Hamed would have to arrange for the conveyance to Yusuf or United of another approximately 9.3 acre parcel located on St. Thomas also titled in the name of Plessen Enterprises, Inc. Hamed, through his son, Waleed, refused to convey this third parcel.

Although Yusuf is not pursuing his claims regarding the misappropriated 2,000,000, Hamed's sons are still seeking to somehow rescind Hamed's conveyance of his interest in the Jordanian parcel that is the subject of Exhibit N in their second amended complaint in *Hamed v. Yusuf*, Civil No. SX-12-CV-377. Yusuf asks this Court to bind Hamed's estate by the agreement signed by Hamed.

VII. Loss of Going Concern Value of Plaza Extra-West

During the period that the Partnership operated Plaza Extra-West, it generated income, supported its expenses and ultimately generated profits. Plaza Extra-West's net profits were expected to continue indefinitely or, upon the dissolution of the Partnership, they were to continue until an orderly liquidation process could be concluded involving purchase of the business by one of the Partners or a third party. In either case, Plaza Extra-West's value as a "going concern" would have been quantified and realized equally by the Partners.

As equal Partners, both Hamed and Yusuf had ownership interests in the "going concern" value of Plaza Extra-West. A "going concern" value recognizes the many advantages that an existing business has over a new business, such as avoidance of start-up costs and improved operating efficiency. In this sense, the "going concern" value of a business represents the

EXHIBIT N

JAMAL Abu Doush
Real Estate Office

Lands Value Estimation

It was upon the request of the request of Mr. Fathi Yousef Mohammad Yousef that I, the owner of Jamal Abu Doush Real Estate Office, Jamal Abu Doush, attended accompanied by the values estimation committee constituted of Messrs. Arsalan Omran Omran, Ibrahim Mohammad Al-Niser and Hasan Mohammad Al-Baz, to carry out a field survey on the plot of land No. (1179), block No. (2), block name (Khirbet Al-Thheiba Al-Janoubieh) of the lands of the village of (Thheiba Al-Gharbieh) affiliated with the Directorate of Registration of Al-Mowaqqar Lands at the Governorate of Amman, the Capital when the following was shown:

The full plot of land is registered in the name of Mr. Mohammad Abdel Qader Asad Hamed while its area amounts to (12769.12) sq. m. which form is regular and is located close to zoned housing residences adjacent to Al-Tuneib Area that is serviced. In fact, we estimate the square meter value to be amounting to 35 Jordanian Dinars and hence, the price of the full plot of land amounts to (446919) only four hundred forty six thousand nine hundred nineteen Jordanian Dinars.

Further, we attended to the location of the plot of land No. (63), block No. (13), block name (Um Al-Toyour) of the lands of the village of (Hayyan Al-Mushref) affiliated with the Directorate of Registration of Al-Mafraq Lands at the Governorate of Al-Mafraq when the following was shown:

The full plot of land is registered in the name of Mr. Mohammad Abdel Qader Asad Hamed while its area amounts to (19017.21) sq. m. which form is regular and is located close to zoned housing residences adjacent to serviced areas as well as the International Amman-Damascus road. In fact, we estimate the square meter value to be amounting to 5 Jordanian Dinars and hence, the price of the full plot of land amounts to (95085) only ninety five thousand eighty five Jordanian Dinars.

Witness hereof, I signed hereunder.

10-1-2016

Estimator
Arsalan Omran
Signed

Estimator
Ibrahim Al-Niser
Signed

Estimator
Hasan Al-Baz
Signed

Office General Manager
Jamal Abu Doush
Signed

Swefich-Hamra St. - Marmara Center - Close to Boston Restaurant

البيروت
الشارع
مركز المارمرا
قريب من مطعم بوسطن

EXHIBIT O

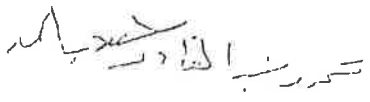


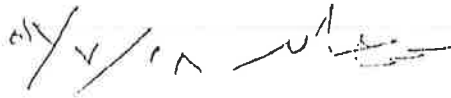
إقرار وتعهد خطي

أنا الموقع أدناه محمد عبد القادر اسعد حامد أرذني الجنسية واحمل الرقم الوطني (٩٣٥١٠١١٩٧٥ و) وحيث أنني امتلك حصصاً مقدارها (٢٤١٢٠) حصة من أصل (٤٦٨٠٠) حصة إجمالي الحصص في قطعة الأرض رقم (٣١٠) حوض (٦) حويجر قرية طبربور من أراضي شرق عمان أقر وأنا بكامل قواي العقلية بأنني قد قبضت ثمن حصتي في قطعة الأرض المذكورة من السيد فتحي يوسف محمد يوسف أرذني الجنسية ويحمل الرقم الوطني (٩٤١١٠١٣٤٦٠) وبذلك يحق للسيد فتحي يوسف المذكور بالتصرف بكامل حصصي تصرف المالك بملكه اعتباراً من تاريخ توقيع هذا الإقرار وأنني أتعهد بعدم إجراء أية تصرفات قانونية في حصصي المباعة من إجارة و/أو رهن و/أو بيع و/أو أية تصرفات و/أو عقود منفعة مع الغير وأتعهد بنقل ملكية الحصة المباعة لدى دائرة الأراضي المختصة بالسرعة الممكنة و/أو تحرير وكالة غير قابلة للعزل للسيد فتحي أو للغير الذي يراه السيد فتحي في حينه مناسباً وأتعهد كذلك بمراجعة المحاكم و/أو الدوائر الرسمية و/أو الأهلية بما يخدم مصلحة المشتري السيد فتحي وحسب ما يراه مناسباً وأن جميع الحقوق المالية و/أو التعويضات التي قد تنشأ عن الاستملاك الواقع على قطعة الأرض موضوع هذا الإقرار والذي قد تحكم به المحكمة هي حقا مكتسباً لصالح السيد فتحي وأنني أوصي أهلي وورثتي الشرعيين من بعدي بعدم معارضة السيد فتحي في الأرض المذكورة وذلك لتعلق حقه بها وقد قمت بالتوقيع على هذا الإقرار على ثلاث نسخ أصلية وأنا بكامل قواي العقلية المعتبرة شرعاً وقانوناً واسقط حقي بالادعاء بكذب الإقرار و/أو الظروف التي أحاطت بتنظيم هذا الإقرار و/أو أي دفع ناشئ و/أو متعلق بهذا الإقرار و/أو تطبيقاته.

تحريراً بتاريخ ٢٠١١/٧/١٨.

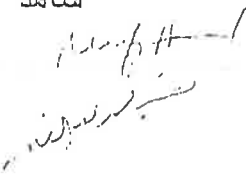
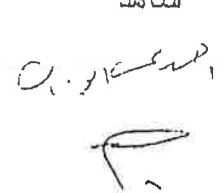
المقر بما فيه

الاسم الرباعي : 

التوقيع : 

شاهد

شاهد


المستشارون
للمحاماة والقانون
COUNSELLORS
for Advocating and Law

المستشارون
للمحاماة والقانون
نظم أسامي ريم. رقتي تحريراً في
اليوم الأحد من شهر ربيع الثاني
المحامي أسامي ريم

Handwritten signature and date: ٢٠١١ / ٧ / ١٦

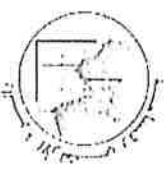
الرقم 46800 / 24120	المنطقة 39833	رقم 000	رقم 310	رقم 14	رقم 0	رقم 6 / حوسنة	اسم المنطقة
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الرقم : الرمز

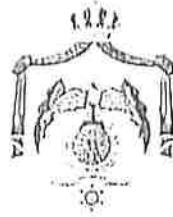
اسم المنطقة : الرمز

التاريخ : 2011/07/11

المنطقة : 1 / 1



المنطقة : الرمز
اسم المنطقة : الرمز



المملكة الأردنية الهاشمية

صورة قيد تسجيل الأموال غير المنقولة

رقم القيد : 2011-EX-17377

اسم الحقون : حويجد

نوع الأرض : ملك

المديرية : اراضي شرق عمان

القرية : طبربور

اسم الحري :

يحتوي هذا القيد على 1 (ملحة)

رقم القطعة : 310	رقم الحري : 0		
رقم الحري : 6	رقم اللوحة : 14		
رقم الوثيقة : 000	مجموع الحصص : 46000		
القيمة التسجيلية : 65.844	مقياس الرسم : 1/2500		
رقم بيان التغيير : --			
<p>المساحة رقماً : 833.000 متر مربع 39 دوليم</p>			
<p>المساحة كتابية : نعة وثلاثون درتم وثمانمائة وثلاثة وثلاثون مترمقط</p>			
<p>يوجد وتوقعات</p>			
الرقم التوثيقي	اسم المالك	الجنسية	الحصص
9411013460	يحيى يوسف محمد يوسف	الأردنية	22680
	محمد عبدالقادر احمد حامد	الأردنية	24120

إن الأموال غير المنقولة المبينة اعلاه مسجلة بأسماء المالكين المذكورين وقد اعطي هذا المسند شهادة بذلك بتاريخ 2011/07/13 واستوفيت الرسوم بموجب الوصول رقم 864195 بتاريخ 2011/05/23

مدير تسجيل : اراضي شرق عمان

* : المالك المشار اليه باشاره (*) هو الشخص المعني بهذا المسند

ليساء نشوان

حاشي بالك اذرة : 17377-YOKP6G

EXHIBIT 10

Page 4 of 5

المملكة الأردنية الهاشمية
دائرة الأراضي والمساحة
مخطط أراضي



رقم الوصل: للعمل الرسمي
تاريخ الاصدار: 12-7-2011
تاريخ التوصل: 12-7-2011

الحوض: حريجر (6)
الحى: -
رقم القطعة: 310

محافظة العاصمة
اراضي شرق عمان
طبربور (129)



الختم والترقيم

Exhibit 2

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

Additional Counterclaim Defendants.

MOHAMMAD HAMED,

Plaintiff,

v.

UNITED CORPORATION,

Defendant.

MOHAMMAD HAMED,

Plaintiff,

v.

FATHI YUSUF,

Defendant.

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF
AND DECLARATORY RELIEF

Consolidated With

CIVIL NO. SX-14-CV-287

ACTION FOR DAMAGES
AND DECLARATORY RELIEF

CIVIL NO. SX-14-CV-278

ACTION FOR DEBT
AND CONVERSION

JURY TRIAL DEMANDED

**SUPPLEMENTATION OF YUSUF'S ACCOUNTING CLAIMS AND PROPOSED
DISTRIBUTION PLAN**

**DUDLEY, TOPPER
AND FEUERZEIG, LLP**
1000 Frederiksberg Gade
P.O. Box 758

St. Thomas, U.S. VI. 00804-0756
(340) 774-4422

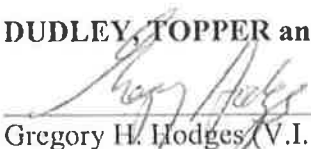
Defendant/counterclaimant Fathi Yusuf ("Yusuf"), through his undersigned counsel, respectfully submits this Supplementation of § VI of his Accounting Claims And Proposed Distribution Plan (the "Claim"), which was submitted to the Master and counsel for plaintiff/counterclaim defendant Mohammad Hamed ("Hamed") on September 30, 2016.¹ Yusuf supplements § VI of his Claim with the "payment analysis" attached as **Exhibit R**, an English translation of the Arabic version of the declaration and undertaking of Hamed (the original Arabic version was attached as Exhibit O to the Claim) attached as **Exhibit S**, and, among other things, the invoices identified in the payment analysis (Exhibit R) in both English and Arabic attached as collective **Exhibit T**. As reflected in Exhibit R, one-half of the value of the two parcels identified in the "Lands Value Estimation" attached as Exhibit N to the Claim (also included in Exhibit T) is \$384,400.08. As further reflected in Exhibit R, one-half of the expenses incurred by Yusuf in conveying Hamed's interest in the Jordanian parcel identified in Exhibits O and S is \$50,521.29. Accordingly, Yusuf's supplemental claim totals US \$434,921.37.

Respectfully submitted,

DUDLEY, TOPPER and FEUERZEIG, LLP

Dated: December 7, 2016

By:


Gregory H. Hodges (V.I. Bar No. 174)
1000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00804
Telephone: (340) 715-4405
Telefax: (340) 715-4400
E-mail: ghodges@dtflaw.com

Attorneys for Fathi Yusuf
and United Corporation

DUDLEY, TOPPER
AND FEUERZEIG, LLP
1000 Frederiksberg Gade
P.O. Box 756
St. Thomas, U.S. V.I. 00804-0756
(340) 774-4422

¹ Like the Claim, Yusuf is not filing this Supplementation with the Court. Instead, he will file a notice of this Supplementation with the Court.

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of December, 2016, I served the foregoing **Notice Of Supplementation Of Yusuf's Accounting Claims And Proposed Distribution Plan** via e-mail addressed to:

Joel H. Holt, Esq.
LAW OFFICES OF JOEL H. HOLT
2132 Company Street
Christiansted, V.I. 00820
Email: holtvi@aol.com

Carl Hartmann, III, Esq.
5000 Estate Coakley Bay, #L-6
Christiansted, VI 00820
Email: carl@carlhartmann.com

Mark W. Eckard, Esq.
Eckard, P.C.
P.O. Box 24849
Christiansted, VI 00824
Email: mark@markeckard.com

Jeffrey B.C. Moorhead, Esq.
C.R.T. Building
1132 King Street
Christiansted, VI 00820
Email: jeffreymlaw@yahoo.com

The Honorable Edgar A. Ross
Email: edgarrossjudge@hotmail.com

Michelle Barker

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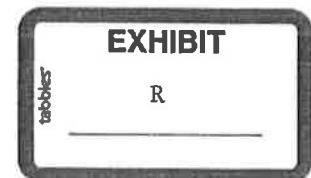
Fathi Yusuf
 Payment Analysis
 As of 11.15.2016

Exchange rate 1 JOD =1.41844USD

<u>Invoice #</u>	<u>Amount J.D Currency</u>
2669	150.000
2344	250.000
253	20,000.000
38054	453.800
38053	261.340
123955	3,594.380
123958	5,406.580
123956	5,836.660
123957	5,405.560
894120	385.640
894119	12,918.120
894005	301.960
894004	4,749.320
894003	1,661.960
123267	1,047.400
123268	1,496.320
123273	1,209.600
123272	1,333.640
123276	2,746.440
123277	822.600
123278	868.320
38020	335.360
Total J.D	71,235.000
Exchange Rate	1.41844
USD	101,042.57

<u>Paid by Fathi Yusuf</u>	
Plot # 1179 value	446,919.000
Plot # 63 value	95,085.000
Total J.D Value	542,004.000
Total USD Value	768,800.15

50% of 768,800.15	384,400.08
50% of 101,042.57	50,521.29
Total Due to Fathi Yusuf	434,921.36



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E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكيينة التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (٦-٩٦٢+)
تلفون ٥٦٥٨٦٠٤ (٦-٩٦٢+)
للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن
البريد الإلكتروني: translationh@nets.com.jo

Counselors For Advocating and Law

Wasfi Al- Tal Str., Youbeel Circle,
Al-Kafjy Complex, 2nd Entrance, 3rd Floor
Tel. : 009626 5535464/5535414
Fax : 5535965, P.O.B. 2323 code 11910 Jordan

Written Declaration and Undertaking

I, the undersigned Mohammad Abdel Qader Asad Hamed, Jordanian nationality, holder of National No. (0933101975), whereas I own 24120 shares out of 46800 shares of the total shares in piece of land No. (310), basin 6, Huwaijer, Tabarbour Village, of east Amman lands, declare, while in full sound mental powers, that I received the price of my share in the mentioned land from Mr. Fathi Yusuf Mohamad Yusuf, Jordanian nationality, holder of National No. (9411 01 3460), hence the said Mr. Fathi has the right to dispose of my shares in full similar to the acts of owner's disposal of his property as of the date of signing this declaration and I undertake not to make any legal disposals in my sold shares such as lease and/or mortgage and/or sale, and and/or any acts and or benefit contracts with third parties and undertake to transfer the ownership of the sold share at the competent Lands Department as soon as possible or execute an irrevocable power of attorney to Mr. Fathi or third parties as deemed appropriate in due course and undertake also to appear before the courts and/or official departments and/or official and/or national departments so as to serve the interest of the buyer Mr. Fathi and as he deems fit and that all the financial rights and/or compensations which may rise out of the expropriation imposed on the piece of land subject of this declaration and which may be adjudged by the court are an acquired right in favour of Mr. Fathi and I recommend my folks and legal heirs after me not to oppose Mr. Fathi in the said land due to his right in it and I have signed this declaration in three originals whilst enjoying my full mental power that are legitimately and legally considered and drop my right to claim the falsehood of the declaration and/or the circumstances surrounding the execution of this declaration and/or any rebut arising from or relating to this declaration and/or its applications.

Executed on 18/7/2011.

Witness (Signed)	Witness (Signed)	Declarant, Quadriple Name: Mohammad Abdel Qader Asad Hamed Signature : (Signed)
---------------------	---------------------	---

(Counselors for Advocating & Law organized before me
and with my knowledge. Executed on: the twelfth of
July in the year of two thousand and eleven)
Lawyer : (Signed)

Seal of Counselors for
Advocating and Law

EXHIBIT

S

المستشارون للمحاماة والقانون

Counselors For Advocating and Law



إقرار وتعهد خطي

أنا الموقع أدناه محمد عبد القادر اسعد حامد أردني الجنسية واحمل الرقم الوطني (٩٣٥١٠١١٩٧٥) وحيث أنني امتلك حصصاً مقدارها (٢٤١٢٠) حصة من أصل (٤٦٨٠٠) حصة إجمالي الحصص في قطعة الأرض رقم (٣١٠) حوض (٦) حويجر قرية طبربور من أراضي شرق عمان أقر وأنا بكامل قواي العقلية بأنني قد قبضت ثمن حصتي في قطعة الأرض المذكورة من السيد فتحي يوسف محمد يوسف أردني الجنسية ويحمل الرقم الوطني (٩٤١١٠١٣٤٦٠) وبذلك يحق للسيد فتحي يوسف المذكور بالتصرف بكامل حصصي تصرف المالك بملكه اعتباراً من تاريخ توقيع هذا الإقرار وأنني أتعهد بعدم إجراء أية تصرفات قانونية في حصصي المبيعة من إجارة و/أو رهن و/أو بيع و/أو أية تصرفات و/أو عقود منفعة مع الغير وأتعهد بنقل ملكية الحصة المبيعة لدى دائرة الأراضي المختصة بالسرعة الممكنة و/أو تحرير وكالة غير قابلة للعزل للسيد فتحي أو للغير الذي يراه السيد فتحي في حينه مناسباً وأتعهد كذلك بمراجعة المحاكم و/أو الدوائر الرسمية و/أو الأهلية بما يخدم مصلحة المشتري السيد فتحي وحسب ما يراه مناسباً وأن جميع الحقوق المالية و/أو التعويضات التي قد تنشأ عن الاستملاك الواقع على قطعة الأرض موضوع هذا الإقرار والذي قد تحكم به المحكمة هي حقاً مكتسباً لصالح السيد فتحي وأنني أوصي أهلي وورثتي الشرعيين من بعدي بعدم معارضة السيد فتحي في الأرض المذكورة وذلك لتعلق حقه بها وقد قمت بالتوقيع على هذا الإقرار على ثلاث نسخ أصلية وأنا بكامل قواي العقلية المعتمدة شرعاً وقانوناً واسقط حقي بالادعاء بكذب الإقرار و/أو الظروف التي أحاطت بتنظيم هذا الإقرار و/أو أي دفع ناشئ و/أو متعلق بهذا الإقرار و/أو تطبيقاته.

تحريراً بتاريخ ٢٠١١/٧/١٨.

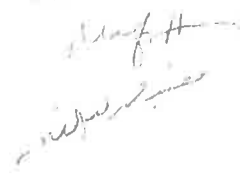
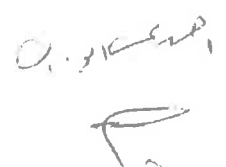
المقر بما فيه

الاسم الرباعي : 

التوقيع : 

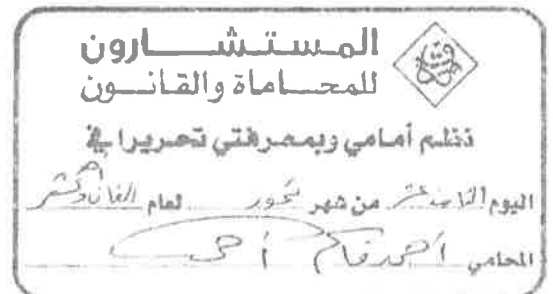
شاهد

شاهد



المستشارون
للمحاماة والقانون
COUNSILORS
for Advocating and Law



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TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

Counselors For Advocating and Law

Collection Voucher
"JD 150"

Date : 17/7/2011

No.: 2669

Received from Mr. **Fathi Mohamad Yusuf** the sum of one hundred and fifty Dinars only in **cash** in consideration of verbal and written consultations in consideration of payment and preparing a written undertaking for piece of land No. (310) Tabarbour of East Amman Lands.

Receiver's Signature
(Signed)

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIH
6th OCTOBER 2016

EXHIBIT

T

tabbles

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(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

Counselors For Advocating and Law

Collection Voucher
"JD 250"

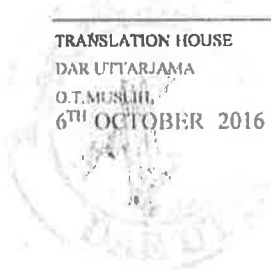
Date : 28/11/2012

No.: 2344

Received from Mr. Fathi Mohamad Yusuf the sum of two hundred and fifty Dinars only in cash in consideration of verbal and written consultations.

Receiver's Signature
(Signed)

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIT,
6TH OCTOBER 2016



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مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

JAMAL Abu Doush
Real Estate Office

Office Fees Details

- Fees for issuing power of attorneys regarding all plots of land amounting in total to twenty four plots of land.
- Fees for power of attorneys regarding all plots of lands.
- Obtaining title deeds for all plots of lands together with fees.
- Obtaining land plans for all plots of lands.
- Obtaining zoning plans together with fees.
- Fees for executing power of attorneys for confirming transactions of power of attorney at the Lands & Survey Department in all the registration departments affiliated with this Department.
- Fees for implementing sale transactions for all the plots of lands at all registration departments.
- Charges for estimation of land plots and field inspections.

Grand total fees : JD 20,000 (Twenty thousand Dinars)
which amount to US\$ 28,368.00

- All transactions were carried out in the year 2011.
- The title of half of the shares of Mr. Mohammad Abdel Qader Asad Hamed were transferred to the benefit of : Fathi Yusuf Mohamad Yusuf

All costs were paid by Mr. Fathi Yusuf Mohamad Yusuf

General Manager of Office
Jamal Mousa Abu Doush
(Signed)



Sweifieh- Hamra St- Marmara Center- Close to Boston Restaurant
Tel : 00962 5855479, Fax : 00962 5855497,
Mob. : 00962 79 5457541
Email : Jamal-abudoush-R-E-O@yahoo.com



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جبل الحسين - مجمع سكنية التجاري
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مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
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JAMAL Abu Doush
Real Estate Office

Lands Value Estimation


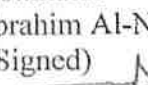
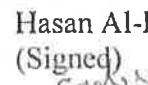
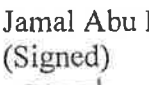
Upon the request of Mr. Fathi Yusuf Mohamad Yusuf I, Jamal Mohamad Yusuf owner of Jamal Abu Doush Real Estate Office, proceeded with the Value Estimation Committee comprised of Messrs. Arsalan Omran Omran, Ibrahim Mohammad Al-Niser and Hasan Mohammad Al-Baz, to carry out a field survey of plot of land No. (1179), basin No. (2), basin name (Khirbet Al-Thheiba Al-Janoubieh) of the lands of the village of (Thheiba Al-Gharbieh) affiliated with the Directorate of Registration of Al-Mowaqqar Lands at the Governorate of Amman, the Capital and the following was discovered :

The full plot of land is registered in the name of Mr. Mohammad Abdel Qader Asad Hamed of an area of (12769.12) sq. m. organized form and located close to zoned housing residencies adjacent to Al-Tuneib Area which is close to services. In fact, we estimate the value per square meter at (35) Jordanian Dinars and hence, the price of the full plot of land amounts to (446919) only four hundred forty six thousand nine hundred nineteen Jordanian Dinars.

Further, we proceeded to the location of plot of land No. (63), basin No. (13), basin name (Um Al-Toyour) of the lands of the village of (Hayyan Al-Mushref) affiliated with the Directorate of Registration of Al-Mafraq Lands at the Governorate of Al-Mafraq when the following was discovered :

The full plot of land is registered in the name of Mr. Mohamad Abdel Qader Asad Hamed and its area amounts to (19017.21) sq. m. organized form and located close to zoned housing residencies adjacent to service areas as well as the International Amman-Damascus road. In fact, we estimate the square meter value to be amounting to 5 Jordanian Dinars and hence, the price of the full plot of land amounts to (95085) only ninety five thousand and eighty five Jordanian Dinars.

In witness whereof it has been signed on 10/1/2016.

Estimator Arsalan Omran	Estimator Ibrahim Al-Niser	Estimator Hasan Al-Baz	Office General Manager Jamal Abu Doush
(Signed) 	(Signed) 	(Signed) 	(Signed) 

Sweifieh-Hamra St-Marmara Center- Close to Boston Restaurant

Jabal Al-Husain
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(For Correspondence Only)
P. O. B. 343 Zarka 13110 Jordan)
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جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
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The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : Mafrag Lands

No. : 0038054

Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	
Sale	186.200
Real Estate Classified	0.200
Revenue Stamps	1.000
Cost of Registration Documents	0.400
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	266.000
Final Total	453.800
Received four hundred fifty three Dinars and 800 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011
38054

Name of Cashier: Firas Ahmad Mohammad Al-Hammad
Signature : (Signed)
(Seal of Land & Survey Department)

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O.T.MUSLIII
6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : Mafraq Lands

No. : 0038053
Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	107.240
Real Estate Classified	0.200
Revenue Stamps	0.500
Cost of Registration Documents	0.200
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	153.200
Final Total	261.340
Received Two hundred sixty one Dinars and 340 Fils only	

As shown above and in witness whereof he was given this receipt.

26/7/2011
38053

Name of Cashier: Firas Ahmad Mohammad Al-Hammad
Signature : (Signed)
(Seal of Land & Survey Department)

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6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (٦-٩٦٢-١)
تلفون ٥٦٥٨٦٠٤ (٦-٩٦٢-١)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
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The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123955

Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	1479.380
Real Estate Classified	0.200
Revenue Stamps	1.000
Cost of Registration Documents	0.400
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	2113.400
Final Total	3594.380
Received three thousand five hundred ninety four Dinars and 380 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011

123955

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer

Signature : (Signed)

(Seal of Land & Survey Department)

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6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (٦-٩٦٢+)
تلفون ٥٦٥٨٦٠٤ (٦-٩٦٢+)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 123958

Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	2225.580
Real Estate Classified	0.200
Revenue Stamps	1.000
Cost of Registration Documents	0.400
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	3179.400
Final Total	5406.580
Received Five thousand four hundred six Dinars and 580 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011
123958

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer
Signature : (Signed)
(Seal of Land & Survey Department)

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6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123956

Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	2402.960
Real Estate Classified	0.200
Revenue Stamps	0.500
Cost of Registration Documents	0.200
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	3432.800
Final Total	5836.660
Received Five thousand eight hundred thirty six Dinars and 660 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011

0123956

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer

Signature : (Signed)

(Seal of Land & Survey Department)

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6th OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (١٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (١٩٦٢-٦)
(للمراسلات فقط ص ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123957

Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	2225.160
Real Estate Classified	0.200
Revenue Stamps	1.000
Cost of Registration Documents	0.400
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	3178.800
Final Total	5405.560
Received Five thousand Four hundred five Dinars and 560 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011
123957

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer
Signature : (Signed)
(Seal of Land & Survey Department)

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (٦-٩٦٢+)
تلفون ٥٦٥٨٦٠٤ (٦-٩٦٢+)
(للمراسلات فقط ص ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : Al- Muwaqqar Lands

No. : 0894120

Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	0.000
Real Estate Classified	0.200
Revenue Stamps	5.200
Cost of Registration Documents	1.400
Trusts for Handicapped Individuals	00.000
Additional Tax	00.000
Additional Fee for Jordanian Universities	00.000
Real Estate Sales Tax	378.840
Final Total	385.640
Received Three hundred eighty five Dinars and 640 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011

894120

Name of Cashier: Firas Ali Hazeem Snouber

Signature : (Signed)

(Seal of Land & Survey Department)

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6TH OCTOBER 2016

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جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department
Center : Al- Muwaqqar Lands

No. : 0894119
Name of Payer : Fathi Yusuf Mohamad Yusuf

Description	Amount
	JD
Declaration Hearing Statement	0.000
Sale	5396.920
Real Estate Classified	0.200
Revenue Stamps	3.000
Cost of Registration Documents	1.200
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	7516.800
Final Total	12918.120
Received twelve thousand nine hundred Eighteen Dinars and 120 Fils	

As shown above and in witness whereof he was given this receipt.

26/7/2011
894119

Name of Cashier: Firas Ali Hazeem Snouber
Signature : (Signed)
(Seal of Land & Survey Department)

TRANSLATION HOUSE
DAR UTTARJAMA
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6TH OCTOBER 2016

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جبل الحسين -- مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : Al- Muwaqqar Lands

No. : 0894005

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount
	JD
Confirmation of a Power of Attorney	301.760
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	301.960
Received Three hundred one Dinars and 960 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011
894005

Name of Cashier: Firas Ali Hazeem Sinouber
Signature : (Signed)
(Seal of Land & Survey Department)

TRANSLATION HOUSE
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6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : Al- Muwaqqar Lands

No. : 0894004

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount
	JD
Confirmation of a Power of Attorney	4749.120
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	4749.320
Received Four thousand seven hundred forty nine Dinars and 320 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011
894004

Name of Cashier: Firas Ali Hazeem Sinouber
Signature : (Signed)
(Seal of Land & Survey Department)

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6TH OCTOBER 2016

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مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : Al- Muwaqqar Lands

No. : 0894003

Name of Payer : Yusra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	1661.760
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	1661.960
Received one thousand sixty one Dinars and 960 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011

894003

Name of Cashier: Firas Ali Hazeem Sinouber

Signature : (Signed)

(Seal of Land & Survey Department)

TRANSLATION HOUSE
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6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123267

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount
	JD
Confirmation of a Power of Attorney	1047.200
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	1047.400
Received one thousand fourty seven Dinars and 400 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011

123267

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer

Signature : (Signed)

(Seal of Land & Survey Department)

TRANSLATION HOUSE
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6TH OCTOBER 2016

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المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123268

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	1496.320
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	1496.320
Received one thousand four hundred ninety six Dinars and 320 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011

123268

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer

Signature :

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIM
6TH OCTOBER 2016

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Telefax (+962-6) 5689459
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(For Correspondence Only
P. O. B. 343 Zarka 13110 Jordan)
E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (٦-٩٦٢-)
تلفون ٥٦٥٨٦٠٤ (٦-٩٦٢-)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 123273

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	1209.600
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	1209.600
Received one thousand two hundred nine Dinars and 600 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011
123273

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer
Signature : (Signed)

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLJIH
6TH OCTOBER 2016

Jabal Al-Husain
Sukayna Commercial Complex
Eastern Entrance, 1st Floor,
Office No. 10
Telefax (+ 962-6) 5689459
Tel. (+ 962-6) 5658604
(For Correspondence Only
P. O. B. 343 Zarka 13110 Jordan)
E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123272

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	1333.640
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	1333.640
Received one thousand three hundred thirty three Dinars and 640 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011
123272

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer
Signature :

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIM
6TH OCTOBER, 2016

Jabal Al-Husain
Sukayna Commercial Complex
Eastern Entrance, 1st Floor,
Office No. 10
Telefax (+ 962-6) 5689459
Tel. (+ 962-6) 5658604
(For Correspondence Only)
P. O. B. 343 Zarka 13110 Jordan)
E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الإلكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0.123276

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	2746.440
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	2746.440
Received two thousand seven hundred forty six Dinars and 440 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011
123276

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer
Signature :

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIM
6TH OCTOBER 2016

Jabal Al-Husain
Sukayna Commercial Complex
Eastern Entrance, 1st Floor,
Office No. 10
Telefax (+962-6) 5689459
Tel. (+962-6) 5658604
(For Correspondence Only)
P. O. B. 343 Zarqa 13110 Jordan)
E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123277

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	822.400
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	822.600
Received eight hundred twenty two Dinars and 600 Fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011

123277

Name of Cashier: Mahmoud Ahmad Awwad Al-Manaseer

Signature :

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIH
6TH OCTOBER 2016

Jabal Al-Husain
Sakayna Commercial Complex
Eastfa Entrance, 1st Floor,
Office No. 10
Telefax (+ 962-6) 5689459
Tel. (+ 962-6) 5658604
(For Correspondence Only
P. O. B. 343 Zarka 13110 Jordan)
E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0123278

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount JD
Confirmation of a Power of Attorney	868.320
Real Estate Classified	0.200
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	868.320
Received eight hundred sixty eight Dinars and 320 fils	

As shown above and in witness whereof he was given this receipt.

24/07/2011

0123278

Name of Cashier: Mahmoud Ahmad Awwad Al- Manaseer

Signature :

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLIM
6TH OCTOBER 2016

Jabul Al-Husain,
Sukayna Commercial Complex
Eastern Entrance, 1st Floor,
Office No. 10
Telefax (+962-6) 5689459
Tel. (+962-6) 5658604
(For Correspondence Only
P. O. B. 343 Zarka 13110 Jordan)
E-Mail:translationh@nets.com.jo

دار الترجمة
TRANSLATION HOUSE
DAR UTTARJAMA

جبل الحسين - مجمع سكنية التجاري
المدخل الشرقي - الطابق الاول
مكتب رقم ١٠
تلفاكس ٥٦٨٩٤٥٩ (+٩٦٢-٦)
تلفون ٥٦٥٨٦٠٤ (+٩٦٢-٦)
(للمراسلات فقط ص.ب ٣٤٣ الزرقاء ١٣١١٠ الاردن)
البريد الالكتروني: translationh@nets.com.jo

The Hashemite Kingdom of Jordan
Ministry of Finance
Land & Survey Department

Center : South Amman Lands

No. : 0038020

Name of Payer : Yussra Fathi Yusuf Hamdan

Description	Amount
	JD
Confirmation of a Power of Attorney	335.360
Real Estate Classified	0.000
Revenue Stamps	0.000
Cost of Registration Documents	0.000
Trusts for Handicapped Individuals	0.000
Additional Tax	0.000
Additional Fee for Jordanian Universities	0.000
Real Estate Sales Tax	0.000
Final Total	335.360
Received Three hundred thirty five Dinars and 360 Fils	

As shown above and in witness whereof he was given this receipt.

25/07/2011

38020

Name of Cashier: Firas Ahmed Mohamed Al-Hammad

Signature : (Signed)

(Seal of Land & Survey Department)

TRANSLATION HOUSE
DAR UTTARJAMA
O.T.MUSLHA
6TH OCTOBER 2016

المستشارون المحاماة والقانون
Counselors For Advocating and Law



بسنند قبض

رقم ٢٦٦٩

فلس دينار

١٨٥٠٤

التاريخ: ١٤/١٢/١٤٤١

وصلني من السيد / السادة: طه، يوسف، صديقه الكمال

مبلغ وقدره: صايقه وخود بنار مظل

نقد / شيك رقم: على بنك / تاريخ

وذلك عن: دفعه استماره وبلغ عدد اقرار ضمني
(بطاقة الارض رقم ٢١٠) طر ١٠١ - اريه سقه ممانه

توقيع المستلم:

١٤٤١
١٤

المستشارون المحاماة والقانونيون
Counselors For Advocating and Law



سند قبض

رقم ٢٣٤٤

فلس دينار

٢٢٥٠٧

التاريخ: ١١/١١/٢٨

وصلني من السيد / السادة: قتيبي محمد بن علي

مبلغ وقدره: مائة وخمسون ريالاً فقط

نقد / شيك رقم: على بنك / تاريخ

وذلك عن: استشارات قانونية وخدمات

توقيع المستلم:

محمد بن علي قتيبي



المسؤولية: ش.م.ك. - الجيزة - حارة مصر الجديدة - شارع سيدى بركات - ج.م.ع.
 هواتف: ٠٠٩٦٢ ٥٤٨٥ ٥٤٧٩ - فاكس: ٠٠٩٦٢ ٥٤٨٥ ٥٤٩٧
 جيلبري: ٤١ ٥٤٥ ٧٥ ٧٩ ٠٠٩٦٢ - ج.م.ع. ٧١١٢٥٨ ارض البردي ١١٢١
 البريد الإلكتروني: Jamal_abudoush_R_E_O@yahoo.com

سند قبض
RECEIPT VOUCHER

رقم: ٢٥٢
 التاريخ: ١٧ / ٧ / ٢٠١٢
 رقم العقد: ١٧
 فليس FILS: ٠٠٠
 دينار JD: ٠٠٠

RECEIVED FROM: **صاحبة من السيد فتحي يوسف محمد يوسف**
 مبلغ وقدره **عشرون ألفاً ديناراً أردنياً** و**البالغ ثمانيناً وعشرون ألفاً وثمانمائة وثمانون وثمانون ريالاً**

رقم الشيك	Cheque No.	تاريخه	DATED	المالك المسحوب عليه	DRAWEE BANK	فليس	FILS	دينار	JD
—	—	—	—	—	—	—	—	—	—

TOTAL: **المجموع**
أجور ايجار ونفقات ومعاملات بيع مع تكاليف الادارة والتأمين والكهرباء
 وذلك عن **المبانيه كما هو مفصل بالكشف المرفق**
 اسم المتدرب: **جمال محمد أبو دوش** AGENT NAME
 التوقيع: **جمال** SIGNATURE
 FOR: **صاحبة من السيد فتحي يوسف محمد يوسف**



**مكتب جمال أبو دوش
العقارية**
JAMAL Abu Doush
Real Estate Office

التقرير المرصق

تفاصيل أرقام الملكة

- أجور إهدار وثائق لجميع قطع الأراضي والتي مجموعها أربعة وعشرون قطعة أرض

- رسوم وثائق لجميع قطع الأراضي

- استخراج سندات تسجيل لجميع قطع الأراضي مع الرسوم

- استخراج محظطات أراضٍ لجميع قطع الأراضي مع الرسوم

- استخراج محظطات تنظيمية مع الرسوم

- أجور تنفيذ معاملات تثبيت الوثائق في دائرة الأراضي والمساحة وذلك في جميع دوائر التسجيل التابعة لهذه الدائرة

- أجور تنفيذ معاملات البيع لجميع قطع الأراضي في كافة دوائر التسجيل

- مصاريف تقديري قطع الأراضي والشهادات الميدانية

مجموع كامل الأجور 20.000 دينار اردني (عشرون الف دينار)

وبالعملة 28.368 دولار امريكي

* تم تنفيذ جميع المعاملات في العام 2011

* تم نقل الملكية لهذه حصص السيد محمد عبد القادر اسعد حامد

لصالح السيد: فتحي يوسف محمد يوسف

وتم دفع جميع التكاليف من قبل السيد فتحي يوسف محمد يوسف

مدير عام المكتب

جمال أبو دوش

خاتم
الدائرة
الرسمي



المملكة الأردنية الهاشمية
وصول المقبوضات
د أ ض ك/ب
يوسف

وزارة المالية
دائرة الأراضي والمساحة
اراضي جنوب عمان
المركز:

No.0123955

رقم: ١٢٣٩٥٥
فتحي يوسف محمد
اسم الدافع:

البيان	المبلغ	
	دينار	فلس
كشف استعاع اقرار	0	000
بيع	1479	380
مصنف عقاري	0	200
طوابع وارادات	1	000
ثمن سندات تسجيل	0	400
أمانات للأشخاص المعاقين	0	000
ضريبة اضافية	0	000
رسم إضافي للخدمات الاردنية	0	000
ضريبة بيع عقار	2113	400
المجموع النهائي	3594	380

ثلاثة آلاف وخمسمائة وأربعة وتسعون ديناراً فقط و
وصلني مبلغ وقدره: ٣٥٥٠٠٠ ديناراً

21924/2

2011/07/26

123955

كما هو مبين اعلاه وعليه اعطي هذا الوصول .

محمود احمد عواد المناشير

اسم امين الصندوق: توقيع:

خاتم
الدائرة
الرسمي



البنك الاردني للتأمين
وصول المقبوضات
بمؤرخة ك/ب

وزارة المالية
دائرة الأراضي والسياحة
المركز:

No.0123958

رقم: ٩٥٨ ملحقاً بـ يوسف محمد
اسم الدافع:

البيان	المبلغ	
	دينار	فلس
كشف استماع اقرار	0	0
بيع	2225	580
مصنف عقاري	0	200
طابع واردات	1	000
ثمن سندات تسجيل	0	400
امانات للأشخاص المعاقين	0	000
ضريبة اضافية	0	000
رسم إضافي للجامعات الاردنية	0	000
ضريبة بيع عقار	3179	400
المجموع النهائي	5406	580

خمسة آلاف وأربعمائة وستة دنانير فقط و 580 فلساً

219242

2011/07/26

123958

كما هو مبين اعلاه وعليه اعطي هذا الوصول .

محمود احمد عواد المناصير

توقيعه:

اسم امين الصندوق:

خاتم
الدائرة
الرسمي

No.0123956

المملكة الأردنية الهاشمية
وصول المقبوضات
د أ ض ك ا ب
يوسف

وزارة المالية
دائرة الأراضي والمساحة
اراضي جنوب عمان
المركز:

رقم: 0123956
اسم الدافع: فتحي يوسف محمد يوسف

البيان	المبلغ	
	دينار	فلس
كشف استماع اقرار	0	000
بيع	2402	960
مصنف عقاري	0	200
طوابع وارادات	0	500
ثمن سندات تسجيل	0	200
امانات للأشخاص المعاقين	0	000
ضريبة اضافية	0	000
رسم إضافي للجامعات الاردنية	0	000
ضريبة بيع عقار	3432	800
المجموع النهائي	5836	660

خمسة آلاف وثمانمائة وستة وثلاثون دينار فقط و 660
وصلني مبلغ وقدره: .. فلسا

2' 1/2

2011/07/26

123956

كما هو مبين اعلاه وعليه اعطي هذا الوصول

محمود احمد عواد العنابير

اسم امين الصندوق: توقيعه:

خاتم
الدائرة
الرسمي

No.0123957

المملكة الأردنية الهاشمية
وصول المفوضات
بوزارة
السياحة
والثقافة
والرياضة
والسياحة
والترفيه
والسياحة
والترفيه
والسياحة
والترفيه

وزارة المالية
دائرة الأراضي والمساحة
الأراضي جنوب عمان
المركز :
رقم: ر ٢٣٩٥٧
الملك محمد السادس
اسم الدافع:

البيان	المبلغ	
	دينار	فلين
كف استمارة اقرار	0	0
بيع	2225	160
مصلحة عقاري	0	200
طوايح واراض	1	000
ثمن سندات تسجيل	0	400
امانات للأشخاص المعاقين	0	000
ضريبة اضافية	0	000
رسم إضافي للجامعات الاردنية	0	000
ضريبة بيع	3178	800
المجموع النهائي	5405	560

خمسة آلاف وأربعمائة وخمسة دينار فقط و 560 فلينا

219242

وصلني مبلغ وقدره :

2011/07/26

123957

كما هو مبين اعلاه وعليه اعطي هذا الوصول .

محمود احمد حواد الماسير

اسم امين الصندوق: توقيعه:

خاتم
الدائرة
الرقمسي



وزارة المالية
دائرة الأراضي والمساحة
المركز:

No. 0894004

رقم: ٠٨٩٤٠٠

اسم الدافع: السيد يوسف حمدان

البيان	المبلغ	
	دينار	فلس
تأسيس وتأسيس	4749	120
مساحة عقارى	0	200
طوارئ ارض	0	000
تأمين منقذات	0	000
تأسيس المساحين	0	000
اربع مملوق تسجيل اراضي الوقر	0	000
شراس عيسى صنوبر	0	000
المجموع الكلى	4749	320

اربع مملوق تسجيل اراضي الوقر
شراس عيسى صنوبر

وتصانف ارباع وقدره:
..... 320 فلصا

2011/07/24
894004

كما هو مبين اعلاه وعليه اعطي هذا التوصل:

اسم المخرج:
توقيع:

خاتم
الدائرة
الرئيسي



المملكة الأردنية الهاشمية

وصول القبوضات
و أرض ل/أ

وزارة المالية
دائرة الاراضي والمصادرة
الادبيات
المركز:

No. 0894003

رقم: ٣٠٠٤٠٠٠

الاسم الدافع: بسري شحر يوسف حمدان

البيانات	المبلغ	
	دينار	فلس
أرض وكنية	1661	000
صندوق عقاري	0	200
أرض وكنية	0	000
أرض وكنية	0	000
أرض وكنية	0	000
أرض وكنية	0	000
أرض وكنية	0	000
أرض وكنية	0	000
المجموع النهائي	1661	960

الأمين صندوق تسجيل اراضي الوقر
قصر الامن عمان صندوق

وخصني مبلغ وقدره:
فلسا

كما هو مبين اعلاه وعليه اعطي هذا الوصول

2011/07/24
894003

الاسم امين الصندوق:
توقيع:

خاتم
الدائرة
الرسمي



وزارة المالية
دائرة الأراضي والمساحة
المركز: ...

No. 0894119

رقم: ٠٨٩٤١١٩

اسم الدافع: ...

المبيان	المبلغ	
	دينار	فلس
تفقد ...	0	100
بيع	5396	920
مقابل ...	0	200
...	3	000
...	1	200
...	0	000
...	0	300
...	0	300
...	7816	800
المجموع النهائي	12918	120

تسجيل أراضي الموقر
على ...

21924

وهي مبلغ وقدره: ...
تسعة عشر ألفاً وثمانمائة وثمانون ديناراً فقط
... 12918.80 ...

2011/07/28
894119

كما هو مبين اعلاه وعليه اعطي هذا الوصول

توقيع: ...

اسم مدير المصروف: ...



Exhibit 3

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

Additional Counterclaim Defendants.

MOHAMMAD HAMED,

Plaintiff,

v.

UNITED CORPORATION,

Defendant.

MOHAMMAD HAMED,

Plaintiff,

v.

FATHI YUSUF,

Defendant.

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF
AND DECLARATORY RELIEF

Consolidated With

CIVIL NO. SX-14-CV-287

ACTION FOR DAMAGES
AND DECLARATORY RELIEF

CIVIL NO. SX-14-CV-278

ACTION FOR DEBT
AND CONVERSION

JURY TRIAL DEMANDED

**AMENDED SUPPLEMENTATION OF YUSUF'S ACCOUNTING CLAIMS AND
PROPOSED DISTRIBUTION PLAN**

Defendant/counterclaimant Fathi Yusuf ("Yusuf"), through his undersigned counsel, respectfully amends the Supplementation of Yusuf's Accounting Claims and Proposed Distribution Plan filed on December 7, 2016 (the "Supplementation") by changing the penultimate sentence thereof to clarify that the \$50,521.29 Yusuf seeks to recover for expenses were incurred in conveying Hamed's interests in a number of Jordanian parcels not the one parcel identified in Exhibits O and S. Accordingly, as amended, the Supplementation should read as follows:

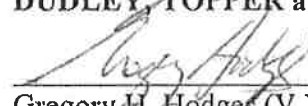
Defendant/counterclaimant Fathi Yusuf ("Yusuf"), through his undersigned counsel, respectfully submits this Amended Supplementation of § VI of his Accounting Claims And Proposed Distribution Plan (the "Claim"), which was submitted to the Master and counsel for plaintiff/counterclaim defendant Mohammad Hamed ("Hamed") on September 30, 2016.¹ Yusuf supplements § VI of his Claim with the "payment analysis" attached as **Exhibit R**, an English translation of the Arabic version of the declaration and undertaking of Hamed (the original Arabic version was attached as Exhibit O to the Claim) attached as **Exhibit S**, and, among other things, the invoices identified in the payment analysis (Exhibit R) in both English and Arabic attached as collective **Exhibit T**. As reflected in Exhibit R, one-half of the value of the two parcels identified in the "Lands Value Estimation" attached as Exhibit N to the Claim (also included in Exhibit T) is \$384,400.08. As further reflected in Exhibit R, one-half of the expenses incurred by Yusuf in conveying Hamed's interests in various Jordanian parcels is \$50,521.29. Accordingly, Yusuf's supplemental claims totals US \$434,921.37.

Respectfully submitted,

DUDLEY, TOPPER and FEUERZEIG, LLP

Dated: December 12, 2016

By:



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and United Corporation

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(340) 774-4422

¹ Like the Claim, Yusuf is not filing this Amended Supplementation with the Court. Instead, he will file a Notice of Submission of Amended Supplementation with the Court.

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of December, 2016, I served the foregoing **Amended Supplementation Of Yusuf's Accounting Claims And Proposed Distribution Plan** via e-mail addressed to:

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The Honorable Edgar A. Ross
Email: edgarrossjudge@hotmail.com

Michele Barker

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Exhibit 4

reflected on Exhibit 1 to the complaint in SX-2014-CV-278, \$802,966¹⁶ would have been allocated to Hamed to equalize the Partnership distribution between the Partners resulting from the sale of the stock of Y&S and R&F. However, since the Accounting Order limits the claims Partners can make to transactions occurring on or before September 17, 2006, any claims Hamed has regarding the sale of the stock of Y&S and R&F are barred by the Accounting Order.

Disputed/Undisputed, Ripe for Determination or Discovery Needed: It is Yusuf's position that this item is barred by the Accounting Order and no longer subject to determination by the Master.

→ **VI. Foreign Accounts and Jordanian Properties**

As part of the profit sharing arrangement between the Partners, at various points in time, profits of the Partnership were sent to Jordan to be held in bank accounts or invested in real property to the mutual benefit of the Partners. In addition, Partnership profits were also sent to Jordan to be used as charitable donations of the Partners. Based upon Yusuf's review of bank documentation available to date and information discovered following the FBI raid, Yusuf claims that Hamed (either individually or through his sons or agents) failed to properly invest all Partnership funds with which he had been entrusted and failed to properly account for such funds. As a result, Hamed either breached his fiduciary duties to the Partnership by failing to properly safeguard, account for, and invest these funds as agreed between the Partners or he converted them for his own personal use or the personal use of his family members.

¹⁶ The Original Claims did not include interest on this claim because, among other things, United did not include all the interest it could claim on the rent actually awarded by the Rent Order. See n. 12, above. There were additional reasons for not paying interest on the claim as reflected in Yusuf's First Amended Answer And Counterclaim filed in SX-2014-CV-278. See also n. 16, below, regarding \$150,000 offset. Because the Accounting Order now bars this claim, the issue of interest is no longer relevant.

Yusuf has repeatedly raised these claims with Hamed and his agent, Waleed Hamed, but has received either unsatisfactory or no responses to questions as to how the funds were spent. The misappropriations or failures to account by Hamed and his agents of which Yusuf is presently aware include:

- a. Hamed and his sons have failed to account for the Partnership funds held in various foreign bank accounts from 1996 to date including, but not limited to, the accounts identified in Exhibit K to the Original Claims. The parties will need to engage in discovery to determine what transactions occurred with respect to those accounts on or after September 17, 2006.
- b. Because Hamed converted \$150,000 previously delivered as a charitable donation for a batch plant in West Bank, his interest in the Partnership should be charged for the transfer of \$150,000.00 to the Bank of Palestine to make good on the original donation. *See* Exhibit L to the Original Claims, Wire Transfer Information Supporting Claim.¹⁷
- c. Waleed Hamed's unauthorized check of \$536,405 to Hamed on April 29, 1998 and additional checks for \$10,000 and \$15,216. *See* Exhibit M to the Original Claims.
- d. Waleed Hamed's failure to account for funds that were removed from the Commercial Francaise Bank in Saint Maarten with four (4) checks totaling \$550,373.14 to close out the account in January and February of 1997.

¹⁷ This payment was made on behalf of the purchaser of the Y&S and R&F stock and represented a portion of the proceeds of the sale of that stock. Accordingly, the amount should be charged against Hamed's interest in the Partnership.

- e. Waleed Hamed's conversion of \$1.4 million received in 1996 as reflected in a St. Maarten police report. Items (c) – (e) would appear to be barred by the Accounting Order.

Approximately forty (40) parcels of real property were purchased in Jordan using funds from the Plaza Extra Stores. All but two of those properties were jointly titled in the names of Hamed and Yusuf. The Court's assistance in administering or liquidating the jointly titled parcels is not sought at this time. Yusuf does seek the Court's assistance, however, with respect to two (2) parcels that were incorrectly titled in Hamed's name alone. These two parcels are identified in the "Land Value Estimation" attached as Exhibit N to the Original Claims. Yusuf respectfully requests an Order requiring the Executor/Administrator of Hamed's estate to take such action as may be necessary to properly reflect Yusuf's joint ownership of these parcels and to recover the \$434,921.37 reflected in Exhibit R to Yusuf's Amended Supplementation Of Accounting Claims submitted to the Master and counsel on December 12, 2016, (the "Amended Supplementation").

Hamed's interest in another parcel that was purchased in Jordan using funds from the Plaza Extra Stores has already been conveyed to Yusuf as part of Hamed's efforts to appease Yusuf following his discovery of the misappropriation of \$2,000,000 sent to Hamed from St. Maarten in or around 1997. A copy of the agreement in Arabic conveying Hamed's interest in such parcel is attached as Exhibit O to the Original Claims¹⁸. Yusuf had agreed to resolve this misappropriation, but not any others that Yusuf might later discover, by the conveyance of Hamed's interest in two parcels, one in Jordan that is the subject of Exhibit N, and one half acre parcel in St. Thomas, previously titled in the name of Plessen Enterprises, Inc., which is

¹⁸ An English translation was provided to the Master and counsel as Exhibit S to the Amended Supplementation on December 12, 2016.

addressed in a number of the Liquidating Partner's Bi-Monthly Reports. See Ninth Bi-Monthly Report at p. 5-6. Yusuf insisted that if Hamed wanted a resolution addressing all Hamed misappropriations, whether known or unknown, Hamed would have to arrange for the conveyance to Yusuf or United of another approximately 9.3 acre parcel located on St. Thomas also titled in the name of Plessen Enterprises, Inc. Hamed, through his son, Waleed, refused to convey this third parcel.

Although Yusuf is not pursuing his claims regarding the misappropriated 2,000,000, Hamed's sons are still seeking to somehow rescind Hamed's conveyance of his interest in the Jordanian parcel that is the subject of Exhibit N of the Original Claims in their second amended complaint in *Hamed v. Yusuf*, Civil No. SX-12-CV-377. Yusuf asks this Court to bind Hamed's estate by the agreement signed by Hamed.

Disputed/Undisputed, Ripe for Determination or Discovery Needed: It is Yusuf's position that these items are disputed and additional discovery is necessary. Furthermore, some of these claims relate to post – September 17, 2006 transactions or agreements between the Partners and therefore have not been eliminated by the Accounting Order.

VII. Loss of Going Concern Value of Plaza Extra-West

During the period that the Partnership operated Plaza Extra-West, it generated income, supported its expenses and ultimately generated profits. Plaza Extra-West's net profits were expected to continue indefinitely or, upon the dissolution of the Partnership, they were to continue until an orderly liquidation process could be concluded involving purchase of the business by one of the Partners or a third party. In either case, Plaza Extra-West's value as a "going concern" would have been quantified and realized equally by the Partners.

Exhibit 5

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

0254-0
RECEIVED
8/11/17

THE ESTATE OF MOHAMMED
HAMED; through its executor, WALEED
"WALLY" HAMED, WALEED "WALLY"
HAMED, individually, WAHEED "WILLY"
HAMED, MUFEED "MAFI" HAMED,
AND HISHAM "SHAWN" HAMED
Plaintiffs,

v.

FATHI YUSUF, YUSUF YUSUF,
MAHER (MIKE) YUSUF, NEJEH
YUSUF,

Defendants.

CIVIL NO. 377/2012

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

REVISED NOTICE OF FILING THIRD AMENDED COMPLAINT¹

Plaintiffs, by and through the undersigned counsel, and give this Court notice of filing Plaintiffs' Third Amended Complaint. (Third Amended Complaint, **Exhibit 1.**)

RESPECTFULLY SUBMITTED
LEE J. ROHN AND ASSOCIATES, LLC
Attorneys for Plaintiffs

DATED: August 8, 2017

BY: 

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¹ The Third Amended Complaint is being refiled to conform to the Court's orders regarding the duplication of Counts III and VI of Plaintiffs' Third Amended Complaint which was inadvertently overlooked in Plaintiffs' filing of August 4, 2017.

stolen 1.4 million. The basis of this outrageously false accusation was nothing more than Fathi Yusuf claiming he remembered a conversation he falsely claims Wally Hamed had with him from the bank where Wally Hamed supposedly told Fathi Yusuf that he was unable to deposit a check to United Corporations account for that amount of funds because of the lack of a current business license and Fathi Yusuf claimed to have remembered telling Wally Hamed to "do what you want" and Fathi Yusuf now believes that it was transferred to Wally Hamed. This false accusation was not supported by any bank transfer documents and in fact the check had been made out to United Corporation and as such, there was no way Wally Hamed could have deposited the funds to himself.

41. Plaintiff, Wally Hamed, pointed out all the above facts to Fathi Yusuf and demanded some proof of the allegations or that Fathi Yusuf discontinue making the outrageous false statements at the mosque, to vendors and employees of Plaza Extra, family members and others.
42. Fathi Yusuf refused and continued to falsely claim that Plaintiffs had stolen the money from him at the mosque, to vendors and employees of Plaza Extra, to family members and to others.
- 43. Plaintiffs pointed out to Fathi Yusuf that the Hamed family had transferred the property in Jordan that was worth in excess of ten million dollars in reliance on Fathi Yusuf's representations that if the transfer would stop all the slander and defamation and dissension between the families and the threats of physical harm.
- 44. Defendant Fathi Yusuf then falsely stated in 2011 that the transfer was only for

to continue into the foreseeable future.

COUNT I

139. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 138 above and incorporate same as if more fully set out herein.

140. The actions of the Defendants constitute defamation per se.

141. As a result the Plaintiffs have been damaged as set out herein.

COUNT II

142. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 141 above and incorporate same as if more fully set out herein.

→ 143. The actions of Defendant, Fathi Yusuf, constitute misrepresentation, tortuous misrepresentation, fraudulent misrepresentation and fraud and coercion to include but not be limited to; Defendant Fathi Yusuf had no intention of stopping his threats and defamation if the Jordan property was transferred to him and the Plaintiff, Mohammad Hamed, transferred the property to Fathi Yusuf to stop the defamation and threats to kill him and his sons.

144. Plaintiffs relied in good faith on the representations of the Defendant.

→ 145. As a result Plaintiffs have suffered damages as alleged as well as loss of the property in Jordan that should be conveyed back to Plaintiff Mohammad Hamed.

COUNT III

146. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 145 above and incorporate same as if more fully set out herein.

147. The Defendants have tortuously interfered with existing and prospective contracts.

148. As a result the Plaintiffs have suffered damages as alleged herein.

COUNT IV

149. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 148 above and incorporate same as if more fully set out herein.

150. The Defendants have intentionally inflicted emotional distress on the Plaintiffs.

151. The Defendants' threats of violence and physical harm have made Plaintiffs in reasonable fear for their lives and physical well-being and the lives and well-being of their family members and caused them extreme emotional distress.

COUNT V

152. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 151 above and incorporate same as if more fully set out herein.

→ 153. Defendant Fathi Yusuf agreed to stop the defamation and threats if the Jordan property was transferred.

→ 154. Defendant Fathi Yusuf breached the contract and continued defaming and threatening Plaintiffs despite receiving the property.

→ 155. As such Plaintiff, Estate of Mohammed Hamed is entitled to return of the property or its value.

COUNT VI

156. Plaintiffs repeat and reallege each and every allegation contained in paragraphs 1 through 155 above and incorporate same as if more fully set out herein.

157. Defendant Mike Yusuf assaulted all the Plaintiffs except Mohammed Hamed.