SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX	
<ul> <li>WALEED HAMED, as the Executor of the Estate of MOHAMMAD HAMED,</li> <li>Plaintiff/Counterclaim Defendant,</li> <li>vs.</li> <li>FATHI YUSUF and UNITED CORPORATION</li> <li>Defendants and Counterclaimants.</li> <li>vs.</li> <li>WALEED HAMED, WAHEED HAMED, and PLESSEN ENTERPRISES, INC.,</li> </ul>	Case No.: SX-2012-CV-370 ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF JURY TRIAL DEMANDED
<i>Counterclaim Defendants</i> , <b>WALEED HAMED</b> , as the Executor of the Estate of MOHAMMAD HAMED, <i>Plaintiff</i> ,	Consolidated with Case No.: SX-2014-CV-287
vs. UNITED CORPORATION, Defendant. WALEED HAMED, as the Executor of the	Consolidated with Case No.: SX-2014-CV-278
Estate of MOHAMMAD HAMED, <i>Plaintiff</i> vs. <b>FATHI YUSUF</b> , <i>Defendant</i> .	
FATHI YUSUF, Plaintiff, vs. MOHAMMAD A. HAMED TRUST, et al, Defendants.	Consolidated with Case No.: ST-17-CV-384
KAC357 Inc., Plaintiff, vs. HAMED/YUSUF PARTNERSHIP, Defendant.	Consolidated with Case No.: ST-18-CV-219

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## HAMED REPLY RE MOTION FOR PARTIAL SUMMARY JUDGMENT RE REVISED CLAIM Y-10 – PAST PARTNERSHIP WITHDRAWALS

Hamed's Reply Re Motion for Partial Summary Judgment - Y-10– Past Partnership Withdrawals Page 2

Hamed made it clear that this was merely a streamlining motion—a ministerial request--as many of the matters in this claim have already been dealt with, or are being dealt with in other claims. In his conclusion, Hamed stated:

This motion for partial summary judgment is more of a ministerial request that a dispute. Hamed hopes that Yusuf will join in the motion to streamline the process.

Instead of participating in such an effort, Yusuf obfuscates and prevaricates. Thus, Hamed leaves the matter to the Master. If the Court wishes to deny the motion entirely and have the parties wade through this without streamlining, including additional discovery as scheduled, that is fine.

If, on the other hand, the Master wishes to enter a housekeeping order directing the parties to get together and remove duplication and out-of-date claims on a good faith, joint basis before completing discovery and the normal summary judgment briefing, Hamed will enthusiastically cooperate.

Dated: November 12, 2021

and

**Carl J. Hartmann III, Esq.** *Co-Counsel for Plaintiff* 2940 Brookwind Dr. Holland MI 49424 Email: carl@carlhartmann.com Tele: (340) 7642-4422

Joel H. Holt, Esq. Counsel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street, Christiansted, VI 00820 Email: holtvi@aol.com Tele: (340) 773-8709 Fax: (340) 773-8670 Hamed's Reply Re Motion for Partial Summary Judgment - Y-10– Past Partnership Withdrawals Page 3

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of November 2021, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

Hon. Edgar Ross Special Master edgarrossjudge@hotmail.com

Charlotte Perrell Stefan Herpel Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 Cperrell@dnfvi.com Sherpel@dnfvi.com

Carl, Hand

## **CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)**

This document complies with the page or word limitations set forth in Rule 6-1(e).

Carl J. Hand