

SUPERIOR COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

**WALEED HAMED**, as the Executor of the  
Estate of MOHAMMAD HAMED,

*Plaintiff/Counterclaim Defendant,*

vs.

**FATHI YUSUF** and **UNITED CORPORATION**

*Defendants and Counterclaimants.*

vs.

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

*Counterclaim Defendants,*

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**WALEED HAMED**, as the Executor of the  
Estate of MOHAMMAD HAMED, *Plaintiff,*

vs.

**UNITED CORPORATION**, *Defendant.*

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**WALEED HAMED**, as the Executor of the  
Estate of MOHAMMAD HAMED, *Plaintiff*

vs.

**FATHI YUSUF**, *Defendant.*

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**FATHI YUSUF**, *Plaintiff,*

vs.

**MOHAMMAD A. HAMED TRUST**, *et al,*

*Defendants.*

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**KAC357 Inc.**, *Plaintiff,*

vs.

**HAMED/YUSUF PARTNERSHIP**,

*Defendant.*

**Case No.: SX-2012-CV-370**

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

JURY TRIAL DEMANDED

Consolidated with

**Case No.: SX-2014-CV-287**

Consolidated with

**Case No.: SX-2014-CV-278**

Consolidated with

**Case No.: ST-17-CV-384**

Consolidated with

**Case No.: ST-18-CV-219**

**HAMED'S SUPPLEMENTAL EXHIBITS TO HIS REPLY  
AS TO HIS MOTION FOR A SECOND RULE 53 REFERENCE  
TO SPECIAL MASTER ROSS**

In his *Reply* in this matter, filed on December 23, 2021, Hamed made the following statement regarding the state of proceedings – and the full briefing of the issue of wrongful dissociation:

Finally, if Yusuf believes that any additional pleading is necessary, the correct action would be for this Court to allow a Rule 15 amendment of the pleadings to conform with what has clearly been before the Master and the parties – without any contest or protest from Yusuf since the claims were first filed (and Hamed made protests about this very issue at the time of the claims filings as per the motion.) This would be so under Rule 15(c) (amendment back) as well as 15(B)(1) (conforming) and 15(B)(2) (issues tried with consent). It amends back, is conforming and has already been partially heard because, under RUPA, (1) all of the parties are already here, (2) all of their claims can be heard in the existing action, (3) all have had full and fair notice, and **(4) all have, in fact, fully done discovery and briefing of the exact issue.**

Hamed has since realized that the briefing referenced is not available to the Court as the docket for the Master's proceedings is provided by CaseAnywhere, and will not be merged back into the Clerk's docket until the end of that reference. Moreover, while that CaseAnywhere docket is available to the Master and parties, it can only be referenced with proper credentials.

Therefore, rather than provide a voluminous attachment, Hamed provides the following to allow the Court to review the referenced filings. If the Court or Mr. Yusuf's counsel would prefer the filing of printed copies with the Clerk, obviously Hamed will do so.

The documents can be viewed or printed by clicking on the underlined cite to "SuperSTX-Ross" for each document, or by accessing them at:

<http://www.federal-litigation.com/hamed.html>

5/19/2021	<a href="#">SuperSTX-Ross</a>	United	<b>Proposed Findings and Conclusions of Law re H-163 (Wrongful Dissociation)</b>
5/19/2021	<a href="#">SuperSTX-Ross</a>	Hamed	<b>Proposed Findings and Conclusions of Law re H-163 (Wrongful Dissociation)</b>
4/15/2021	SuperSTX-Ross	All	<b>Zoom Hearing on Y-8 (Water) and H-163 (Wrongful Dissociation)</b>
5/2/2020	<a href="#">SuperSTX-Ross</a>	Hamed	<b>Hameds Reply re Partial Summary Judgment as to Claim H-163 Loss of Assets Due to Wrongful Dissociation</b>
4/9/2020	<a href="#">SuperSTX-Ross</a>	Yusuf	<b>Yusuf Opposition to Hamed's Motion re Claim H-163 - Damages For Wrongful Dissociation</b>
11/29/2019	<a href="#">SuperSTX-Ross</a>	Hamed	<b>Hamed's Rule 6.1(d) Notice Of Supplementation Of His Motion For Partial Summary Judgment: As To Hamed Claim H-163 - Damages For Wrongful Dissociation</b>
11/18/2019	<a href="#">SuperSTX-Ross</a>	Hamed	<b>Hamed Motion for Partial SJ as to H-163 - Damages for Wrongful Dissociation</b>

Respectfully Submitted,

**Dated:** January 2, 2022



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### CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of January, 2022, 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**

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A handwritten signature in blue ink, reading "Carl J. Hamed" with a long horizontal flourish extending to the right.

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

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

A handwritten signature in blue ink, reading "Carl J. Hamed" with a long horizontal flourish extending to the right.