

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,

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

vs.

UNITED CORPORATION, *Defendant.*

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

vs.

FATHI YUSUF, *Defendant.*

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*

Defendants.

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 BRIEF IN RESPONSE TO THE SPECIAL MASTER'S
ORDER OF JUNE 9, 2022 AS TO Y-10**

In his *sua sponte* Order of June 19, 2022, the Special Master posed two questions for the parties:

CONCLUSION

Based on the foregoing, the Master will order Hamed and Yusuf to file supplemental briefs to address the issues raised above. Accordingly, it is hereby:

ORDERED that, within thirty (30) days from the date of entry of this Order, Hamed and Yusuf SHALL each file a supplemental brief addressing the issues listed below:

1. Why these account closure proceeds—\$88,711.00 and \$89,392.00—should not proceed as an individual accounting claim as part of Yusuf Claim No. Y-12 instead of as a set off as part of Yusuf Claim No. Y-10?
2. Why these weddings gifts—\$3,000,000—should not proceed as part of Hamed Claim No. Y-151 instead of as a set of as part of Yusuf Claim No. Y-10?

Pursuant to the Master's discussion at 12-13 of that order, Hamed takes the position that claims related to the \$88,711.00 and \$89,392.00—should proceed as an individual accounting claim as part of Yusuf Claim No. Y-12 instead of as a set off as part of Yusuf Claim No. Y-10.

Hamed also takes the position, based on the Master's discussion at 14, that claims related to the wedding gifts—\$3,000,000—should proceed as part of Hamed Claim No. Y-151 instead of as a set of as part of Yusuf Claim No. Y-10. Hamed again notes that the spouses of the Hamed sons were Yusuf's daughters. This would normally lead to the conclusion that BDO tried to reach. However, in Hoda's divorce, the Yusuf's claimed the gift amount was personal to her, and from her father--and should be recovered solely by her. Thus, both the accompanying letters and the positions taken show these were personal gifts which the Yusuf's claimed should be (and were) recovered, not payments

from Hamed or the Partnership. She received a settlement having taken this position—
including the family residence.

Dated: June 10, 2022



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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of June 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

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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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

