**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

**MOHAMMAD HAMED,** *by his authorized***)**

*agent* WALEED HAMED, **)**

**) CIVIL NO. SX-12-CV-99**

Plaintiff, **)**

**v. )**

**) ACTION FOR DAMAGES,**

**FATHI YUSUF** and **UNITED CORPORATION, ) INJUNCTIVE AND**

**) DECLARATORY RELIEF**

**)**

Defendants. **) JURY TRIAL DEMANDED**

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**PLAINTIFF’S MOTION FOR PARTIAL SUMMARY JUDGMENT**

The plaintiff, by counsel, hereby moves for partial summary judgment pursuant to Rule 56 and Rule 56.1. The basis for the motion is more fully set forth in the attached memorandum, which is incorporated herein by reference. For the reasons set forth therein, it is respectfully requested that the relief sought be granted.

**Dated:** November 12, 2012 /s/Joel H. Holt, Esq.

**Joel H. Holt, Esq.**

*Counsel for Plaintiff*

Law Offices of Joel H. Holt

2132 Company Street,

Christiansted, VI 00820

**Dated:** November 12, 2012 /s/*Carl J. Hartmann, III, Esq.*

**Carl J. Hartmann III, Esq.**

*Co-Counsel for Plaintiff*

5000 Estate Coakley Bay, L-6

Christiansted, VI 00820

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of November, 2012, I filed the foregoing with the Clerk of the Court, and delivered by ECF to the following:

**Joseph A. DiRuzzo, III Nizar A. DeWood**

Fuerst Ittleman David & Joseph, PL The Dewood Law Firm

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/s/*Joel H. Holt, Esq.*