**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

**MOHAMMAD HAMED**, by his )

authorized agent WALEED HAMED, )

 )

 *Plaintiff/Counterclaim Defendant*, )

 )

 vs. ) **CIVIL NO. SX-12-CV-370**

 )

**FATHI YUSUF** and )

**UNITED CORPORATION**, ) )

 *Defendants/Counterclaimants*, )

 ) ACTION FOR DAMAGES

 vs. ) INJUNCTIVE RELIEF AND

 ) DECLARATORY RELIEF

**WALEED HAMED, WAHEED** )

**HAMED, MUFEED HAMED,** )

**HISHAM HAMED,** ) JURY TRIAL DEMANDED

and **PLESSEN ENTERPRISES, INC.**, )

 )

 *Counterclaim Defendants*. )

 )

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

**RE THE STATUTE OF LIMITATIONS DEFENSE BARRING DEFENDANTS’ COUNTERCLAIM DAMAGES PRIOR TO SEPTEMBER 16, 2006**

 Plaintiff hereby moves for partial summary judgment based on the statute of limitations defense raised as to Defendants’ counterclaims. The basis for the motion is more fully set forth in the memorandum being submitted in support of said motion, which is incorporated herein by reference. For the reasons set forth therein, it is respectfully submitted that the relief sought be granted. A proposed order is also being submitted with this motion.

**Dated:** May 13, 2014

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**CERTIFICATE OF SERVICE**

 I hereby certify that on this 13th day of May, 2014, I served a copy of the foregoing Motion by email, as agreed by the parties, on:

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