

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX

MOHAMMAD HAMED By His Authorized
Agent WALEED HAMED,

Plaintiff,

v.

FATHI YUSUF and UNITED CORPORATION,

Defendants.

CIVIL NO. SX-12-CV- 370

ACTION FOR DAMAGES
INJUNCTIVE AND
DECLARATORY RELIEF
JURY TRIAL DEMANDED

REPLY TO OPPOSITION TO PLAINTIFF'S NOTICE OF SUPPLEMENTATION OF
THE PRELIMINARY INJUNCTION RECORD

The Plaintiff respectfully submits that it has properly supplemented the record in this case, as it has done nothing more than to submit documents that are part of the existing exhibits regarding (1) United's rent notices to Mohammed Hamed at Plaza Extra that demonstrate that United and Plaza Extra are separate legal entities (Landlord/Tenant and Corporation/Partnership) and (2) the defendants continued use of partnership funds to pay their non-partnership legal fees. Indeed, United has now sent another rent notice for April, confirming it acknowledges the separate existence of the Plaza Extra partnership. See Exhibit A.

Thus, the defendant's opposition to supplementing the record is without merit, as these documents are properly part of the preliminary injunction record, demonstrating why the relief sought is appropriate and still needed.

Dated: April 4, 2013



Joel H. Holt, Esq.
Counsel for Plaintiff
2132 Company Street,
Christiansted, VI 00820

Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Est. Coakley Bay, L6
Christiansted, VI 00820

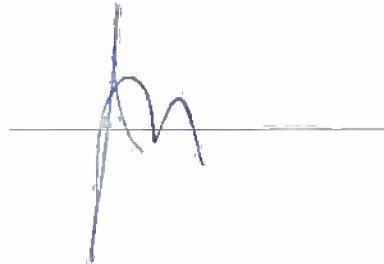
CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of April, 2013, I served a copy of the foregoing Motion by hand on:

Nizar A. DeWood
The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820

And by email (jdiruzzo@fuerstlaw.com) and mail to:

Joseph A. DiRuzzo, III
Christopher David
Fuerst Ittleman David & Joseph, PL
1001 Brickell Bay Drive, 32nd. Fl.
Miami, FL 33131

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be the initials 'CD' or similar, with a vertical stroke on the left and several loops on the right.

UNITED CORPORATION
4C & 4D Sion Farm
St. Croix, USVI 00821
Phone (340) 778-6240

April 1, 2013

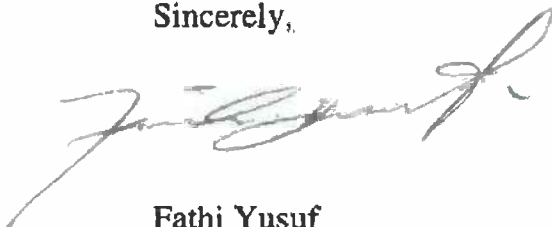
Mohammad Abdul Qader Hamed
Plaza Extra Supermarket
4-C & 4-D Estate Sion Farm
Christiansted, VI 00821

Statement of Rent due for Plaza Extra – East as of April 1, 2013

Rent due for Plaza Extra – East January 1, 2012 through March 31, 2013	Balance Due	\$3,840,026.77
ADD: 1% interest on outstanding Balance		\$ <u>38,400.27</u>
	Amount Due	\$3,878,427.04
April 2013 Rent currently due:		<u>\$250,000.00</u>
	Total Balance due April 1, 2013	<u>\$4,128,427.04</u>

Please forward a check immediately.

Sincerely,



Fathi Yusuf

