

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

**UNITED CORPORATION,**  
Plaintiff,

v.

**WADDA CHARRIEZ,**  
Defendant.

**CIVIL NO.:** SX-13-CV-152

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**WADDA CHARRIEZ,**

Counter-Claimant,

v.

**UNITED CORPORATION,**  
Defendant.

**CIVIL NO.:** SX-13-CV-152

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**WADDA CHARRIEZ,**

Third-Party Plaintiff,

v.

**FATHI YUSUF,**  
Third-Party-Defendant.

**CIVIL NO.:** SX-13-CV-152

**ACTION FOR DAMAGES**

JURY TRIAL DEMANDED

**UNITED CORPORATION'S NOTICE**  
**REGARDING TWO PENDING MOTIONS: 1) TO JOIN A NECESSARY PARTY AND,**  
**2) TO SUBSTITUTE A NECESSARY PARTY**

Pursuant to the Court's January 16, 2018 Order following a status conference, Plaintiff /Counterclaim Defendant UNITED CORPORATION ("United") files this Notice Regarding Two Pending Motions: 1) To Join a Necessary Party and, 2) To Substitute a Necessary Party and shows as follows:

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AND FEUERZEIG, LLP**  
1000 Frederiksberg Gade  
P.O. Box 756  
St. Thomas, U.S. V.I. 00804-0756  
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**I. The Partnership Has Operated for Decades Under United's Umbrella**

The partnership between Fathi Yusuf and Mohammad Hamed (the "Partnership") operated under the umbrella of United for decades and even after the Partnership was declared by the Court in the *Hamed v. Yusuf*, SX-12-CV-370 (the "Main Case"), it continued to operate under that umbrella. The Partnership utilized United to employ various employees including Defendant Wadda Charriez. To that end, all documentation relating to Wadda Charriez's employment will reflect work for United, i.e. checks, time records, W-2's etc. Given the relationship between the Partnership and United, there was concern that the Partnership should be substituted or its Liquidating Partner be brought in as a necessary party.

As far as the pending motions are concerned, United shows that it was the employer for Defendant Wadda Charriez and that it may proceed with the prosecution of this claim but, in the event that the Court deems it proper to include the Partnership because it was functioning through United, that the substitution and/or joinder occur.

Date: January 31, 2018

Respectfully submitted,

**DUDLEY, TOPPER and FEUERZEIG, LLP**

By 

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*Fathi Yusuf*

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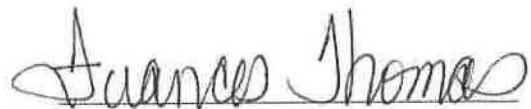
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**CERTIFICATE OF SERVICE**

I hereby certify that on this **31st** day of January, 2018, I caused the foregoing "**UNITED CORPORATION'S NOTICE REGARDING TWO PENDING MOTIONS: 1) TO JOIN A NECESSARY PARTY AND, 2) TO SUBSTITUTE A NECESSARY PARTY**" to be served upon the following via e-mail:

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