

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

WALEED HAMED and KAC357, INC.,	)	
	)	CIVIL NO. SX-16-CV-429
<i>Plaintiffs,</i>	)	
v.	)	
	)	ACTION FOR DAMAGES
BANK OF NOVA SCOTIA,	)	
d/b/a SCOTIABANK, FATHI YUSUF,	)	
MAHER YUSUF, YUSUF YUSUF,	)	
and UNITED CORPORATION,	)	
	)	
<i>Defendants.</i>	)	JURY TRIAL DEMANDED
_____	)	

**DEFENDANT BANK OF NOVA SCOTIA'S ANSWERS TO PLAINTIFF HAMED'S  
FIRST INTERROGATORIES  
TO THE BANK OF NOVA SCOTIA**

COMES NOW Defendant, Bank of Nova Scotia (BNS), by and through its undersigned attorneys, Nichols Newman Logan Grey & Lockwood, P.C., Charles E. Lockwood, Esq., and answers Plaintiff Hamed's FIRST INTERROGATORIES TO THE BANK OF NOVA SCOTIA as follows:

Plaintiff Hamed, by counsel, propounds the following first interrogatories pursuant to Rule 33 of the *Virgin Islands Rules of Civil Procedure* (V.I. R. CIV. P.) on Defendant BNS, and requests responses within thirty (30) days as per the Order of the Court dated October 31, 2017.

**INSTRUCTIONS**

If any of the following Interrogatories cannot be answered in full, please answer to the extent possible, specify the reason for your inability to answer the remainder and state whatever information or knowledge you have concerning the unanswered portion. Where your investigation is incomplete, give all information known as of the date of signing your answer. Where exact data

is unavailable, supply estimated data, indicate that you have done so, and explain the basis on which the estimate was made.

If you decline to answer any interrogatory, or portion of any interrogatory, on a claim of privilege or other basis for withholding an answer, such as the work product doctrine, state each privilege or other basis for withholding claimed and describe in detail all foundational facts upon which you base such claim of privilege or basis for withholding.

It is requested that all copies of all documents identified in response be attached to the answers to the responses to these Interrogatories as an exhibit. Please take notice that these Interrogatories are deemed to be continuing up to and including the first day of trial of this action. If at any time, you or any person acting on your behalf obtains additional information called for by these Interrogatories between the time of your response and the time set for trial, please serve supplemental sworn answers setting forth such information.

The words "**and**," as well as "**or**," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the specifications all responses which might otherwise be construed to be outside its scope.

Terms in the plural include the singular and terms in the singular include the plural; the use of one gender shall include all others as appropriate in the context.

These interrogatories are continuing in nature so as to require **you, the Defendant**, to file supplemental answers if any additional or different information responsive to these interrogatories is discovered or obtained subsequent to the filing of answers to these interrogatories.

#### **TERMS AND MEANINGS**

The terms used in this Discovery have the following meaning:

As used herein, the term "document(s)" is used in its broadest sense to include, by way of illustration only and not by way of limitation, all originals and non-identical copies of any writing or any other tangible thing or data compilation in the custody, possession or control of the Defendant - whether printed, typed, reproduced by any process, written or produced by hand, including any graphic matter however produced or reproduced, or produced by any other mechanical means and all data, either electronic, magnetic, chemical, mechanical, or other form of data storage capable of being transformed into written or oral matter, including, but not limited to, CD-ROMs, DVDs, computer disks, Hard-drive computer storage mediums - including e-mails, letters, affidavits, filings, engineering studies and for tests, reports, agreements, communications, correspondence, permits, accounting records, business records, contracts, letters of agreements, telegrams, mailgrams, memoranda, summaries and/or records of personnel or telephone conversations, diaries, calendars, forecasts, photographs, tape recordings, facsimiles, models, statistical statements, graphs, charts, plans, drawings, service and/or pump data, logs, minutes or records of meetings, minutes or records of conferences, reports and /or summaries of interviews, reports, conversations, summaries of investigations, opinions or reports of consultants, topographical or geological maps or surveys, appraisals, records, reports or summaries of negotiations, drafts of any document, revisions of drafts of any document, purchase orders, invoices, receipts, original or preliminary notes, financial statements, accounting work papers, promissory notes, film, microfilm, microfiche, punch cards, slides, pictures, videotapes, moving pictures, computer programs, laboratory results, magnetic tapes or any other matter which is capable of being read, heard or seen with or without mechanical or electronic assistance.

"Communication" means any correspondence, contact, discussion, exchange, contract, or agreement between any two or more persons. Without limiting the foregoing, "communication"

includes all documents, as defined above, telephone conversations, internet communications, e-mail, facsimile transmissions, voice mail, face-to-face conversations, meetings, and conferences.

### **DEFINITIONS**

None.

### **INTERROGATORIES**

GENERAL OBJECTIONS: BNS objects to the Plaintiffs' Interrogatories because they are not authorized by the Court's Order of October 31, 2017, which allowed limited discovery in this matter solely with regard to BNS's Motion To Dismiss, as converted to a Motion For Summary Judgment by the Court. These Interrogatories have little or nothing to do with the legal and factual grounds which entitle BNS to summary judgment in this matter. As further explained in BNS's responses below, the Plaintiffs are abusing the discovery permitted by the Court and attempting to engage in broad discovery which the Court has not authorized and which is unnecessary, time consuming, expensive and wasteful of judicial resources at this stage of the proceedings in this matter. Particularly unnecessary, time consuming, expensive and wasteful of judicial resources at this stage of the proceedings in this matter are Plaintiffs' multiple Interrogatories which, as BNS further explains below, the Plaintiffs already have the answers-to and the supporting information and documentation, because Plaintiffs have been engaged-in related litigation with the Yusufs and other related defendants (but not BNS) for several years in multiple separate law suits. From said separate litigation, which has produced subpoenas to BNS from the parties to those separate law suits, and criminal matters, the Plaintiffs have gathered multiple documents and other forms of information which they are now asking BNS to re-investigate, re-produce and (together with this Court) reanalyze. Plaintiffs' Interrogatories go far beyond the very limited discovery regarding summary judgment issues which this Court authorized in its Order of October 31, 2017.

'The thousands of documents which the Plaintiffs have gathered from said separate matters were dumped on Defendant BNS on June 9, 2017 in this matter. For expediency, these documents will be referred to as "Plaintiffs' Documents Produced To BNS Herein June 9, 2017" and said reference will include the following Bates-numbers, which were placed on said documents by Plaintiffs:

FBIX210733-FBIX210772;FBIX210779-FBIX210784;FBIX234782-FBIX234787;FBIX234788-FBIX234791;FBIX234792-FBIX234795;FBIX234796-FBIX234800;FBIX234801-FBIX234805;FBIX234806-FBIX234808;FBIX234809-FBIX234810;FBIX234811-FBIX234813;FBIX234814-FBIX234818;FBIX234819-FBIX234825;FBIX234826-FBIX234827;FBIX234828-FBIX234829;FBIX234830-FBIX234832;FBIX234833-FBIX234834;FBIX234835-FBIX234837;FBIX234838-FBIX234841;FBIX234842-FBIX234851;FBIX234856;FBIX234860-FBIX234863;FBIX240947-FBIX241017;FBIX252487-FBIX252499;FBIX254453-FBIX254507;FBIX25526-FBIX25527;FBIX256003-FBIX256008;FBIX257026-FBIX257047;FBIX257048-FBIX257068;FBIX257085-FBIX257102;FBIX257122-FBIX257141;FBIX257142-FBIX257159;FBIX257160-FBIX257166;FBIX254190-FBIX257194;FBIX257195-FBIX257204;FBIX257205-FBIX257211;FBIX257212-FBIX257215;FBIX257218-FBIX257220;FBIX257221-FBIX257222;FBIX257238-FBIX257241;HAMD205557-AMD2505562;HAMD214653-HAMD214654;HAM214659-HAMD214660;HAMD214662-HAMD214666;HAMD214669-HAMD214669;HAMD214681-HAMD214682;HAMD214683-HAMD214684;HAMD214685-HAMD214686;HAMD214688-HAMD214690;HAMD214693-HAMD214693;HAMD214695-HAMD214704;HAMD214706-HAMD214708;HAMD214710-HAMD214714;HAMD214716-HAMD214726;HAMD214728-HAMD214741;HAMD214742-HAMD214773;HAMD214781-HAMD214781;HAMD214782-HAMD214799;HAMD214811-HAMD214813;HAMD214814-HAMD214814;HAMD214815-HJAMD214815;HAMD214816-214817;HAMD214818HAMD214820;HAMD214828-HAMD214832;HAMD214833-HAMD214837;HAMD214869-HAMD214876;HAMD214883-HAMD214957;HAMD214958-HAMD215021;HAMD215055-HAMD215074;HAMD215207-HAMD215267;HAMD225395-HAMD225395;HAMD225396-HAMD225396;HAMD225398-HAMD225398HAMD225406-HAMD225406;HAMD225415-HAMD225430;HAMD225431-HAMD225446;HAMD225491-HAMD225508;HAMD225541-HAMD225541;HAMD225560-HAMD225563;HAMD225564-HAMD225569;HAMD225570-HAMD225580;HAMD225581-HAMD225583;HAMD225586-HAMD225586;HAMD225587-HAMD225588;HAMD225589-HAMD225593;HAMD225594-HAMD225597;HAMD225598-HAMD225601;HAMD225614-HAMD225615;HAMD25618-HAMD225619; HAMD225622-HAMD225625; HAMD225626-HAMD225629; HAMD225666-HAMD225668; HAMD225675-HAMD225679; HAMD225685-HAMD225687; HAMD225688-HAMD225692; HAMD225698-HAMD225702; HAMD225703-HAMD225704; HAMD225705-HAMD225705; HAMD225732-HAMD225735; HAMD225740-HAMD225750; HAMD225751-HAMD225751; HAMD225752-HAMD225756; HAMD225759-

HAMD225766; HAMD225787-HAMD225793; HAMD225798-HAMD225803; HAMD225810-HAMD225812; HAMD225813-HAMD225815; HAMD225846-HAMD225863; HAMD225879-HAMD225880; HAMD225898-HAMD225907; HAMD225908-HAMD225908; HAMD225909-HAMD225910; HAMD225912-HAMD225934; HAMD225935-HAMD225943; HAMD225953-HAMD225969; HAMD226010-HAMD226027; HAMD226043-HAMD226047; HAMD226058-HAMD226069; HAMD226070-HAMD226072; HAMD226073-HAMD226074; HAMD226075-HAMD226077; HAMD226078-HAMD226082; HAMD226083-HAMD226099; HAMD226100-HAMD226101; HAMD226102-HAMD226103; HAMD226125-HAMD226126; HAMD226129-HAMD226130; HAMD226383-HAMD226400; HAMD226401-HAMD226416; HAMD226417-HAMD226432; HAMD226433-HAMD226435; HAMD226436-HAMD226437; HAMD226440-HAMD226441; HAMD226442-HAMD226445; HAMD226446-HAMD226456; HAMD226457-HAMD226459; HAMD226460-HAMD226462; HAMD226704-HAMD226707; HAMD226723-HAMD226723; HAMD226858-HAMD226859; HAMD226870-HAMD226876; HAMD226963-HAMD226978; HAMD227421-HAMD227429; HAMD227502-HAMD227503; HAMD241818-HAMD241819; HAMD242785-HAMD242788; HAMD268851-HAMD268861HAMD268870-HAMD268877; HAMD277434-HAMD277468; HAMD298925-HAMD298925; HAMD342354-HAMD342404;HAMD362529-HAMD362748; HAMD429777-HAMD429777; HAMD429781-HAMD429787; HAMD429813-HAMD429828; HAMD429853-HAMD429854; HAMD429911-HAMD429912; HAMD429914-HAMD429915; HAMD429916-HAMD429920; HAMD429916-HAMD429920; HAMD430012-HAMD430016; HAMD430038-HAMD430041; HAMD430062-HAMD430066; HAMD430075-HAMD430079HAMD430160-HAMD430166; HAMD430168-HAMD430168; HAMD430180-HAMD430185; HAMD430210-HAMD430227; HAMD430263-HAMD430279;HAMD430294-HAMD430316; HAMD430326-HAMD430332; HAMD430364-HAMD430368; HAMD430482-HAMD430483; HAMD430490-HAMD430491; HAMD430507-HAMD430508; HAMD430509-HAMD430510; HAMD430741-HAMD430741; HAMD430765-HAMD430782; HAMD430783-HAMD430798; HAMD430799-HAMD430814; HAMD430839-HAMD430841; HAMD430845-HAMD430846; HAMD431249-HAMD431251; HAMD435911-HAMD435911; HAMD435912-HAMD435912; HAMD435913-HAMD435913; HAMD435920-HAMD435920; HAMD435924-HAMD435924; HAMD435975-HAMD436006; HAMD436015-HAMD436032; HAMD436051-HAMD436053; HAMD436093-HAMD436099; HAMD436191-HAMD436254; HAMD436288-HAMD436307; HAMD436309-HAMD436327; HAMD437453-HAMD437453; HAMD438614-HAMD438671; HAMD445775-HAMD445775; HAMD445942-HAMD445942; HAMD469081-HAMD469155; HAMD551151-HAMD551370; HAMD562208-HAMD562218HAMD588470-HAMD588506; HAMD588547-HAMD588583; HAMD588622-HAMD588627; HAMD588675-HAMD588679; HAMD592229-HAMD592234; HAMD592237-HAMD592249; HAMD593708-HAMD593744; HAMD594294-HAMD594299; HAMD596053-HAMD596060; HAMD596158-HAMD596158; HAMD596172-HAMD596184; HAMD596185-HAMD596190; HAMD596191-HAMD596194; HAMD596211-HAMD596215; HAMD596216-HAMD596227; HAMD596228-HAMD596239; HAMD596240-HAMD596265; HAMD596266-HAMD596268; HAMD596269-HAMD596270; HAMD596271-HAMD596272; HAMD596297-HAMD596297; HAMD596298-HAMD596299; HAMD596300-HAMD596300; HAMD596302-HAMD596303; HAMD596303-HAMD596303HAMD596307-HAMD596307; HAMD596332-HAMD596333; HAMD596334-HAMD596334; HAMD596494-HAMD596494; HAMD596495-HAMD596496; HAMD596505-HAMD596505; HAMD596506-HAMD596507; HAMD596536-HAMD596537; HAMD596551-HAMD596556; HAMD596557-HAMD596562; HAMD596589-

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PEOP100675; PEOP100676-PEOP100686; SCOT501300-SCOT501941; SCOT501942-SCOT502058; SCOT502059-SCOT502201; YUSF239410-YUSF239414

1. List each meeting or conversation Fathi Yusuf, his counsel or any of his sons have had with BNS, its employees, counsel or management from March 2013 to present relating to, or in which the Hameds or Plessen were discussed; and for each such meeting state all persons who attended for all or part, the subject, any document reviewed present or exchanged and the location and time.

Objections: This interrogatory is irrelevant, vague, overbroad and places an undue burden on BNS as-phrased. This interrogatory also calls for privileged attorney work product information since it calls for interviews by BNS's counsel. BNS has a multitude of employees and representatives throughout the world. Fathi Yusuf, his sons and the business interests they represent, and their various representatives are also numerous and spread throughout the world. Their various legal representatives are myriad and represent said persons and entities in a variety of matters which bear no relationship to this matter. The same is true of the Hamed family members and "Plessen".<sup>1</sup> BNS has no way of knowing whether one of its employees or representatives may have had an informal conversation with one of the Yusufs or their representatives at some time in the past 5 years about one of the persons or entities addressed in this interrogatory, nor is BNS obligated to search for any information which does not directly relate to the subject matter of this law suit, or to surmise how this vague interrogatory could lead to some such information, and doing either would be unduly burdensome on BNS. In addition, the Plaintiffs and their representatives have spoken with and subpoenaed information from BNS and the Yusufs and their various entities concerning the same subjects addressed in this interrogatory on numerous occasions in the past regarding these same subjects, as evidenced in the documents submitted by the Plaintiffs in discovery in this matter, which amount-to thousands of pages, which the Plaintiffs have gathered as part of the multiplicity of years-old law suits between the Plaintiffs, the Hameds and the Yusufs and their various entities.<sup>2</sup> Thus, the Plaintiffs are simply asking BNS to repeat what the Plaintiffs already know. The Plaintiffs' discovery strategy is objectionable because it asks BNS and this Court to engage-in unnecessary, time consuming and expensive investigation of discovery which the Plaintiffs already have, and have-had years to investigate for themselves. Subject to said objections, BNS answers as follows:

1. BNS Senior Paralegal and Legal Officer Karen Stair communicated with representatives of the Yusufs, Dudley, Topper and Feuerzeig, including but not

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<sup>1</sup> No definition of what "Plessen" refers to is given by the Plaintiffs, contributing to the objections raised herein.

<sup>2</sup> Despite BNS's requests to stay discovery in this matter from its inception, the Plaintiffs served several thousand pages of said discovery on BNS on June 9, 2017, in PDF form, which was obviously collected from other preexisting cases.



limited to Pamela Bayliss, paralegal, to transmit copies of documents subpoenaed by the Hameds' attorneys, in approximately July-August of 2016.

2. BNS representative Yvette Clendinen had periodic contact with members of the Yusuf or Hamed families at BNS's Sunny Isle Branch when they dropped-off or picked-up business information regarding businesses operated by the Yusufs and the Hameds. Said interactions included, but were not limited to, Mike Yusuf, Wally Hamed and Mike Hamed dropping-off updated identification information in approximately 2014 and Mike Yusuf dropping-off legal paperwork related to separate litigation involving the Hameds and Yusufs on April 3, 2014.
3. See also, documents BNS/WH00001-00484; See also, Plaintiffs' Documents Produced To BNS Herein June 9, 2017.

2. List each meeting or conversation BNS, its employees, counsel, or managers has had with VIPD, its employees, counsel or management from March 2013 to present relating to, or in which the Hameds or Plessen were discussed; and for each such meeting state all persons who attended for all or part, the subject, any document reviewed present or exchanged and the location and time.

Objections: This interrogatory is irrelevant, vague, overbroad and places an undue burden on BNS as-phrased. This interrogatory also calls for privileged attorney work product information since it calls for interviews by BNS's counsel. BNS has a multitude of employees and representatives throughout the world. The Hamed family members and "Plessen"<sup>3</sup> are also numerous and spread throughout the world. Their various legal representatives are myriad and represent said persons and entities in a variety of matters which bear no relationship to this matter. The same is true of VIPD and its "counsel"<sup>4</sup>, which includes the VI Attorney General's Office in the case of criminal matters, in the VI. BNS has no way of knowing whether one of its employees or representatives may have had an informal conversation with one of the persons involved with these VI Government agencies at some time in the past 5 years about one of the persons or entities addressed in this interrogatory, nor is BNS obligated to search for any information which does not directly relate to the subject matter of this law suit, or to surmise how this vague interrogatory could lead to some such information, and doing either would be unduly burdensome on BNS. In addition, the Plaintiffs and their representatives have spoken with and subpoenaed information from BNS and these VI Government agencies concerning the same subjects addressed in this interrogatory on numerous occasions in the past regarding these same subjects, as evidenced in the documents submitted by the Plaintiffs in discovery in this matter, which amount-to thousands of pages, which the Plaintiffs have gathered as part of the multiplicity of years-old law suits between the Plaintiffs, the Hameds and the Yusufs and their various entities and the Hameds' criminal

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<sup>3</sup> No definition of what "Plessen" refers to is given by the Plaintiffs, contributing to the objections raised herein.

<sup>4</sup> Also undefined by the Plaintiffs, and contributing to the objections raised herein.

matters. Thus, the Plaintiffs are simply asking BNS to repeat what the Plaintiffs already know. The Plaintiffs' discovery strategy is objectionable because it asks BNS and this Court to engage in unnecessary, time consuming and expensive investigation of discovery which the Plaintiffs already have, and have had years to investigate for themselves. Subject to said objections, BNS answers as follows:

1. BNS Senior Paralegal and Legal Officer Karen Stair responded to a subpoena duces tecum issued to BNS by the VI Attorney General's Office on September 16, 2013.
2. See also, documents BNS/WH00001-00484; See also, Plaintiffs' Documents Produced To BNS Herein June 9, 2017.

3. List each meeting or conversation BNS, its employees, counsel, or managers has had with the USVI AG's Office, its employees, counsel or management from March 2013 to present relating to, or in which the Hameds or Plessen were discussed; and for each such meeting state all persons who attended for all or part, the subject, any document reviewed present or exchanged and the location and time.

Objections: This interrogatory is irrelevant, vague, overbroad and places an undue burden on BNS as-phrased. This interrogatory also calls for privileged attorney work product information since it calls for interviews by BNS's counsel. BNS has a multitude of employees and representatives throughout the world. The Hamed family members and "Plessen"<sup>5</sup> are also numerous and spread throughout the world. Their various legal representatives are myriad and represent said persons and entities in a variety of matters which bear no relationship to this matter. The same is true of VI Attorney General's Office and its "counsel"<sup>6</sup>, which includes Deputy Attorneys in the case of criminal matters, in the VI. BNS has no way of knowing whether one of its employees or representatives may have had an informal conversation with one of the persons involved with this VI Government agency at some time in the past 5 years about one of the persons or entities addressed in this interrogatory, nor is BNS obligated to search for any information which does not directly relate to the subject matter of this law suit, or to surmise how this vague interrogatory could lead to some such information, and doing either would be unduly burdensome on BNS. In addition, the Plaintiffs and their representatives have spoken with and subpoenaed information from BNS and this VI Government agency concerning the same subjects addressed in this interrogatory on numerous occasions in the past regarding these same subjects, as evidenced in the documents submitted by the Plaintiffs in discovery in this matter, which amount to thousands of pages, which the Plaintiffs have gathered as part of the multiplicity of years-old law suits between the Plaintiffs, the Hameds and the Yusufs and their various entities and the Hameds' criminal matters. Thus, the Plaintiffs are simply asking BNS to repeat what the Plaintiffs already know. The Plaintiffs' discovery strategy is objectionable because it asks BNS and this Court to

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<sup>5</sup> No definition of what "Plessen" refers to is given, contributing to the objections raised herein.

<sup>6</sup> Also undefined, and contributing to the objections raised herein.

engage-in unnecessary, time consuming and expensive investigation of discovery which the Plaintiffs already have, and have had years to investigate for themselves. Subject to said objections, BNS answers as follows:

1. See answer to Interrogatory #2.
2. See also, documents BNS/WH00001-00484; See also, Plaintiffs' Documents Produced To BNS Herein June 9, 2017.

4. List all documents received from or given to the Yusufs, VIPD or VI AG from March 2013 to present relating to, or in which the Hameds or Plessen were discussed; and for each such meeting state all persons who attended for all or part, the subject, any document reviewed present or exchanged and the location and time.

Objections: See the objections stated with regard to the various parties in Interrogatories 1, 2 and 3. Subject to said objections, BNS answers as follows:

1. See answers to Interrogatories 1, 2 and 3.
2. See also, documents BNS/WH00001-00484; See also, Plaintiffs' Documents Produced To BNS Herein June 9, 2017.

5. For each of the documents given to the VIPD or VI AG, state the source of the document, when it was given and what was said in relation to it.

Objections: See the objections stated with regard to the various parties in Interrogatories 2, 3 and 4. Subject to said objections, BNS answers as follows:

1. See answers to Interrogatories 2, 3 and 4.
2. See also, documents BNS/WH00001-00484; See also, Plaintiffs' Documents Produced To BNS Herein June 9, 2017.

6. Give the name, address, identification and contact method for person or entity with whom/which BNS, its counsel, managers or employees has discussions or communications regarding the Hameds' arrest.

Objections: This interrogatory is irrelevant, vague, overbroad and places an undue burden on BNS as-phrased. This interrogatory also calls for privileged attorney work product information since it calls for interviews by BNS's counsel. BNS has a multitude of employees and representatives throughout the world. The Hamed family members are also numerous and spread throughout the world. BNS has no way of knowing whether one of its employees or representatives may have had an informal conversation with one of the persons involved with some person or

entity at some time in the past 5 years about one of the persons (or potentially entities) addressed in this interrogatory, nor is BNS obligated to search for any information which does not directly relate to the subject matter of this law suit, or to surmise how this vague interrogatory could lead to some such information, and doing either would be unduly burdensome on BNS. In addition, the Plaintiffs and their representatives have spoken with and subpoenaed information from BNS concerning the same subjects addressed in this interrogatory on numerous occasions in the past regarding these same subjects, as evidenced in the documents submitted by the Plaintiffs in discovery in this matter, which amount-to thousands of pages, which the Plaintiffs have gathered as part of the multiplicity of years-old law suits between the Plaintiffs, the Hameds and the Yusufs and their various entities and the Hameds' criminal matters. Thus, the Plaintiffs are simply asking BNS to repeat what the Plaintiffs already know. The Plaintiffs' discovery strategy is objectionable because it asks BNS and this Court to engage-in unnecessary, time consuming and expensive investigation of discovery which the Plaintiffs already have, and have-had years to investigate for themselves. Subject to said objections, BNS answers as follows:

1. BNS Senior Paralegal and Legal Officer Karen Stair responded-to a subpoena duces tecum issued to BNS by the VI Attorney General's Office on September 16, 2013 by mail.
2. BNS Senior Paralegal and Legal Officer Karen Stair responded-to a subpoena duces tecum issued to BNS by Attorneys Joel Holt and Carl Hartmann on May 31, 2016 by email.
3. BNS Attorneys Charles E. Lockwood, Todd H. Newman and Gregg R. Kronenberger have had numerous mail, email, telephone and personal contacts with the Plaintiffs' attorneys (including but not limited to Holt and Hartmann), the Yusufs' attorneys, representatives of law enforcement, representatives of the VI Attorney General's Office and this Court.
- 4.

See also, documents BNS/WH-00001-00484; See also, Plaintiffs' Documents Produced To BNS Herein June 9, 2017.

I HEREBY CERTIFY THAT I HAVE READ THE FOREGOING, I UNDERSTAND IT, AND THE FACTS STATED HEREIN ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

DEEFENDANT BNS BY REPRESENTATIVE:

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KAREN STAIR  
BNS Senior Paralegal and Legal Officer

Dated: June 8, 2018



**Charles E. Lockwood (#1212)**  
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### CERTIFICATE OF SERVICE

I hereby certify that on this 8<sup>th</sup> day of June 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

**Joel H. Holt, Esq.**

*Counsel for Plaintiffs*  
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