

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

UNITED CORPORATION.)	CIVIL NO. SX-13-CV-03
)	
Plaintiff)	ACTION FOR DAMAGES INJUNCTIVE RELIEF AND DECLARATORY RELIEF
)	
)	
VS.)	PLAINTIFF'S REQUEST FOR ADMISSIONS TO DEFENDANT WALEED HAMED
)	
WALEED HAMED)	
)	
Defendant)	
_____)	

PLAINTIFFS' REQUEST FOR ADMISSIONS TO DEFENDANT WALEED HAMED

TO: **Waleed Hamed**
c/o Mark W. Eckard, Esq.
#1 Company Street
P.O. Box 24849
Christiansted VI 00824

COMES NOW Plaintiff United Corporation, by and through his undersigned counsel, Nizar A. DeWood, hereby propounds and serves the following request for admissions to be provided to Plaintiff's counsel, within thirty (30) days from the date of service hereof.

A. As used in this demand for production, unless it is otherwise provided or the context requires a different meaning, words importing the singular include and apply to several persons or things; words importing the masculine gender include the feminine; words used in the present tense include the future.

B. When used in this demand for production, the term "in writing" or "document" or "record" is defined to include all tangible things by which human communication is transmitted or stored, including but not limited to letters, reports, memoranda, bank statements, studies, books, diaries, contracts, agreements, receipts,

vouchers, ledgers, magnetic or phonographic recording, models, prototypes, statements, invoices, tickets, canceled checks, computer printouts, flowcharts, and other like or similar materials or items, custody or control (actual or constructive) of the Plaintiff.

C. Documents must be catalogued by number to correspond to the appropriate request.

D. Whenever you contend that a request calls for privileged information, you shall identify the privilege claimed by you, identify the subject matter to which your claim pertains, and with respect to documents identify each document subject to the claim privilege.

E. Whenever you wish to object for any reason to a request, you shall state the nature of your objections, identify the subject matter to which your objection pertains, and cite the legal rule upon which you rely in effecting your objection.

5. Admit that you received only a salary as a form of compensation from United Corporation for the years of **1999 through 2003**.

6. Admit that you received only a salary as a form of compensation from United Corporation for the years of **2004 through 2012**.

7. Admit that you have opened brokerage accounts to trade securities with one or more brokerage firms since 1986.

8. Admit that you have opened and maintained at least one bank account on the island of St. Maarten.

9. Admit that you opened at least one bank account in your name in the country of Jordan.

10. Admit that you have opened at least one bank account in the country of Jordan for which you have control.

11. Admit that you signed and filed (or instructed a third party to file) your 1992 and 1993 tax returns with the Virgin Islands Bureau of Internal Revenue.

Date: November 15, 2013

Respectfully Submitted,

DEWOOD LAW FIRM
Attorneys for Plaintiffs

By: *Nizar A. DeWood*
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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT a true and exact copy of the foregoing *Plaintiff's First Requests For Admissions to Defendant Waleed Hamed* was served via electronic mail by parties' stipulation on this the 15th day of November 2013 to wit:

Mark W. Eckard, Esq.
#1 Company Street
P.O. Box 24849
Christiansted VI 00824
Counsel for Defendant

via: CM/ECF | Mail | Fax | Hand Delivery | Email

Nizar A. DeWood
Nizar A. DeWood, Esq.