

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

NOTICE OF FILING
PLAINTIFF HAMED'S RULE 26 INITIAL DISCLOSURES

Comes now Mohammad Hamed (Hamed), by counsel and hereby gives notice of filing his Initial Disclosures pursuant to Rule 26.

Dated: July 16, 2012



Joel H. Holt, Esq.

Counsel for Plaintiff

Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820

Carl J. Hartmann III, Esq.

Co-Counsel for Plaintiff

5000 Estate Coakley Bay,
Unit L-6
Christiansted, VI 00820

CERTIFICATE OF SERVICE


I hereby certify that on July 16, 2013, a true and accurate copy of the foregoing was forwarded via USPS and email to the following:

Joseph A. DiRuzzo, III

Fuerst Ittleman David & Joseph, PL
1001 Brickell Bay Drive, 32nd. Fl. 2006
Miami, FL 33131

Nizar A. DeWood

The Dewood Law Firm
Eastern Suburb, Suite 101
Christiansted, VI 00820



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

MOHAMMAD HAMED by His Authorized Agent WALEED HAMED,)	
)	
<i>Plaintiff,</i>)	CIVIL NO. SX-12-CV- 370
v.)	
)	ACTION FOR DAMAGES INJUNCTIVE AND DECLARATORY RELIEF
FATHI YUSUF and UNITED CORPORATION,)	
)	
<i>Defendants.</i>)	JURY TRIAL DEMANDED
)	

PLAINTIFF HAMED'S RULE 26 INITIAL DISCLOSURES

Comes now Mohammad Hamed (Hamed), by counsel, pursuant to Rule 26(a)(1) and hereby files his *Initial Disclosures* as follows:

WITNESSES:

1. Mohammed Hamed, Plaintiff, c/o Joel H. Holt– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
2. Waleed Hamed, c/o Joel H. Holt– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
3. Waheed Hamed, c/o Joel H. Holt– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
4. Mufeed Hamed, c/o Joel H. Holt– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
5. Hisham Hamed, c/o Joel H. Holt– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
6. Fathi Yusuf, c/o Joseph A. DiRuzzo, III – has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
7. Mahar Yusuf, c/o Joseph A. DiRuzzo, III – has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
8. Yusuf Yusuf, c/o Joseph A. DiRuzzo, III– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.

9. Najjar Yusuf, c/o Joseph A. DiRuzzo, III– has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
10. Ayman Al-Khaled, c/o Plaza Extra West – has knowledge of the accounting records of the three Plaza Extra Stores.
11. John Gaffney, c/o Plaza Extra West – has knowledge of the accounting records of the three Plaza Extra Stores.
12. Wadda Charriez, works at Plaza Extra at Sion Farm, St. Croix.
13. Kareema Dorsette, works at Plaza Extra at Tutu Mall, St. Thomas.

DOCUMENTS:

Exhibits to the January 25 and 31, 2013 Preliminary Injunction Hearing

Plaintiff Exhibit (“PX”) 1 (Deposition Transcript)

February 19, 2013 Supplemental Exhibits: Deposition Exhibits 6 & 7 in *Idheileh v United Corporation and Fathi Yusuf* (Supplementation to PX 1)

PX 1-A (Depo. Transcript excerpts)

PX 2 (Memorandum of Law in Support of Defendants’ Renewed Motion to Dismiss, Motion for a More Definite Statement, and Motion to Strike Exhibits “B” through “D” of the Amended Complaint, dated November 5, 2012)

PX 3 (Defendants’ Reply to Plaintiff’s Opposition to Defendants’ Rule 12 Motion, dated December 13, 2012)

PX 4 (Complaint)

PX 7 (Rent Documents)

PX 8 (Rent Calculation)

PX 9 (Check for \$5.4M)(redacted)

PX 10 (Email from N. DeWood to Waleed Hamed)

PX 11 (Dissolution Letter)

PX 12 (Email from N. DeWood to Waleed Hamed with proposed Partnership Dissolution Agreement)

PX 13 (Notice of Withdrawal re: \$2.7M)

PX 14 (Waheed Hamed letter re: Controllers/Accountants)

PX 15 (Checks drawn in 29 days by Yusuf from segregated grocery operations accounts)

PX 16 (Check to Smock & Moorhead, \$3,395.00)

PX 17 (Stock Certificate Authorization - Y&S Corp)

PX 18 (Fathi Yusuf handwritten calculations for Dorthea property)

PX 20 (Rent Notice for February 1, 2013 to Plaza Extra)

PX 22 (General Warranty Deed, June 21, 2012--Estate Hannah)
PX 23 (General Warranty Deed, May 18, 2012 -- Estate Grange)
PX 24 (General Warranty Deed, December 17, 2012--Estate Enfield Green)
PX 26 (Banco Popular Securities Statement, December 31, 2012)
PX 27 (Checks to Fathi Yusuf signed by Fathi Yusuf)
PX 28 (Interrogatories 2 and 6 (10/04/1999) from *Idheileh v United Corporation and Fathi Yusuf*)
PX 29 (Summary Judgment Motion from *Idheileh v United Corporation and Fathi Yusuf*)
PX 30 (Checks (1/21 and 2/13, 2013) written on Plaza Extra Supermarket accounts to pay Defendants' counsel)
March 18, 2013 Supplements to PX 7 and 15 (March 1, 2013 Rent Due letter and check written on Plaza Extra Supermarket account to pay Defendants' counsel)
April 4, 2013 Supplement to PX 7 (April 1, 2013 Rent Due letter)
April 8, 2013 Supplement to PX 15 (April 3, 2013 check written on Plaza Extra Supermarket account to pay Defendants' counsel)
April 23, 2013 Supplement to record (Waleed Hamed Declaration)
May 24, 2013 Supplement to record (5/16/2013 email re Mohammad Hamed paying taxes, 5/17/2013 letter regarding a new claim by United for back rent, May 21, 2013 letter from Yusuf declaring re no hiring of new employees, and May 22, 2013 request from Willie Hamed for clarification of Yusuf memo)
June 10, 2013 Supplement to record (June 1, 2012 Rent Due letter and Reply Memorandum filed in the Superior Court by United Corporation in *Williams v. United*, acknowledging that the Plaza Extra Supermarket stores are operated as a partnership)

Additionally, attached is a disc with a table of contents containing copies of additional documents.

INSURANCE:

None.

DAMAGES:

The relief sought in the complaint sets forth the damages and other related claims being asserted in this case.

Dated: July 16, 2012



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Counsel for Plaintiff
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