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By Email and Mail

Re: *Hamed v. Yusuf and United Corporation*

Dear Counsel:

I have reviewed United Corporation's responses to discovery dated September 19, 2013. I believe the following responses are deficient and need to be promptly supplemented, but if you disagree with any item I alternatively request we meet and confer on these items any day next week:

I. Interrogatory Responses

The following interrogatory responses need to be answered in full or supplemented:

Interrogatory #2-As you noted, there are two interrogatories #2. The second one deals with the identity of third parties who received funds from United Corporation from the \$2,784,706.25 check attached as Exhibit A to the discovery. You first object to this interrogatory on the grounds that it was not understandable and that the funds were deposited into the United tenant account. However, this question asks the name and address of all third parties to whom these funds were transferred by United. For example, Maher Yusuf testified that \$500,000 was used to purchase real property on St. Croix. Moreover, in response to interrogatory 11 you indicate that these funds are no longer in United's possession. This interrogatory seeks the information related to the other third parties who received the balance of these funds. Please provide this information.

Interrogatory #3-This interrogatory asks for specific information about Mattress Pal Holding, LLC. You first object to this interrogatory on the grounds that it was not understandable and then state that the information is not discoverable for reasons like it being a trade secret and is not discoverable. However, if United invested any funds in this company (such as from the \$2,784,706.25), then my client may have a claim against that interest, such as similar allegations your client has made in other case against members of the Hamed family. Please supply this information.

Interrogatory #6-This interrogatory asks for information about real property owned by United Corporation or for United. You have responded that this information is equally available to my client from the Recorder of Deeds. First, my client is not required to routinely have to check with the Recorder of Deeds to update this information, much less go to two islands to do so. Second, the Recorder of Deeds does not have records of property owned outside of the Virgin islands or unrecorded deeds. Third, deeds would not reflect properties held for the benefit of United. Please supply this information.

Interrogatory #9- This interrogatory seeks information about the payment of certain legal fees. This request is simple and straight forward, which information my client is entitled to since those fees may have been withdrawn from a partnership account and will have to be returned. Please supply this information

II. Document Production

The following responses to my client's document requests need to be answered in full or supplemented:

Document Request #5- This request is for the tax returns filed since 2002 by United Corporation. You claim they are not relevant yet you argue throughout your pleadings that they are relevant since they allegedly show United reporting 100% of the income and expenses from the businesses. We are entitled to this information to determine the accuracy of these representations. Please supply this information.

Document Request #6- This request is for correspondence exchanged with the U.S. Attorney's Office, U.S. Marshall's Office or IRB since January 1, 2013. You claim this discovery is not relevant to this case for several reasons, but you have referenced matters involving both the U.S. Attorney's Office and the IRB in pleadings filed in this case, including representations alluding to their respective positions regarding the existence of the partnership, so this information is relevant and could possibly lead to admissible evidence. As for correspondence with the U.S. Marshall, we will limit that request to documents directly related to the Popular Securities account, which is relevant since it involves funds that the Court has determined my client has an interest in and which are the subject of the issues in this case. Please supply this information.

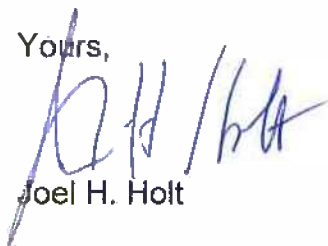
Document Request #7- Subsection (a) of this request seeks information related to the disbursement of the \$2,784,706.25, to which you did not respond. Please supply this information. Subsection (b) of this request is simple and straight forward, which my client is entitled to since those fees may have been withdrawn from a partnership account and will have to be returned. Please supply this information. The request in subsection (c) is withdrawn.

Document Request #12- This request seeks the accounting records your client says exist regarding the withdrawal of funds by the Yusuf and Hamed families, but which was never been provided as suggested at mediation. Indeed, even if it had been provided it would have been protected by the confidentiality provisions governing mediation. In any any event, please supply this information.

III. Summary

If you have any further questions or want to discuss this further with me, please let me know. If your client is unwilling to supplement its responses as requested, please provide me with a date next week that we can meet and confer on these items pursuant to Rule 37 so we can hopefully resolve any disputes or at least narrow the discovery issues that the Court will then need to address.

Yours,

A handwritten signature in blue ink, appearing to read 'JH/Holt', is written over the typed name 'Joel H. Holt'.

Joel H. Holt

cc: Christopher David (by email)