

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS/ST. JOHN**

UNITED CORPORATION.)	CIVIL NO. ST-13-CV-102
)	
Plaintiff)	ACTION FOR DAMAGES INJUNCTIVE RELIEF AND DECLARATORY RELIEF
)	
VS.)	PLAINTIFF'S REQUEST FOR ADMISSIONS TO DEFENDANT WAHEED HAMED
WAHEED HAMED)	
)	
Defendant)	
_____)	

PLAINTIFFS' REQUEST FOR ADMISSIONS TO DEFENDANT WAHEED HAMED

TO: **Waheed Hamed**
Carl Hartmann
5000 Estate Coakley Bay, L-6
Christiansted VI 00820
carl@carlhartmann.com

COMES NOW Plaintiff United Corporation, by and through its 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.

REQUEST FOR ADMISSIONS

1. Admit that you are an employee of United Corporation, and have worked at the Plaza Extra-East Store and the Plaza Extra – Tutu Park Store from at least 1990 through present.

2. Admit that you owe a duty of loyalty and care to United Corporation as its employee.

3. Admit that you received an employee salary as the only form of compensation from United Corporation for the years of the year you began working **through 1994.**

4. Admit that since 1986 you did not receive any payroll checks drawn on the account of any entity described as a partnership.

- 5.** Admit that all inventory orders for the Plaza Extra stores you have ever placed as manager/employee were on behalf of United Corporation and not on behalf of any named partnership.

- 6.** Admit that when you were indicted in the case of *United States v. Waheed Hamed*.

- 7.** Admit that during the criminal proceedings in your case, you never informed the United States government, the Virgin Islands government, the District Court, or your attorneys that you were an employee of a partnership.

- 8.** Admit that United Corporation d/b/a Plaza Extra is currently the custodian of all operating accounts of the operations of Plaza Extra Supermarkets.

9. Admit that you received a salary as the only form of compensation from United Corporation for the years of **1995 through 1998**.

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

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

12. Admit that you have opened at least one brokerage account to trade securities with one or more brokerage firms since 1986.

- 13.** Admit that you have opened and maintained, **or were an authorized signatory** on at least one bank account on the island of St. Maarten.

- 14.** Admit that you have opened at least one bank account in your name in the country of Jordan and/or the West Bank, Jordan.

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

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

17. Admit that Schedule C of your Tax Return for the year 1992 is accurate as to amounts and properly reflects the status and name of your business as 5 Corners Mini Mart.

Date: November 15, 2013

Respectfully Submitted,

DEWOOD LAW FIRM
Attorneys for Plaintiffs

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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 Waheed Hamed* was served via electronic mail by parties' stipulation on this the 15th day of November 2013 to wit:

Carl Hartmann
5000 Estate Coakley Bay, L-6
Christiansted VI 00820
carl@carlhartmann.com

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

Nizar A. DeWood
Nizar A. DeWood, Esq.