

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

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

PLAINTIFF'S RESPONSES TO DEFENDANT FATHI YUSUF'S FIRST REQUESTS FOR THE PRODUCTION OF DOCUMENTS TO PLAINTIFF MOHAMMAD HAMED

Plaintiff Mohammad Hamed, through his attorney, Joel Holt, responds to the correspondingly numbered paragraphs of Defendants' Document Requests to Plaintiff, as follows:

**PLAINTIFF'S GENERAL OBJECTIONS TO,
AND RESERVATIONS CONCERNING, DEFENDANTS'
FIRST SET OF DOCUMENT REQUESTS TO PLAINTIFF**

Plaintiff Mohammad Hamed, through his attorney, Joel Holt, asserts the following general objections to, and reservations concerning, Defendant's First Set of Document Requests to Plaintiff.

1. Plaintiff is producing the attached documents without admitting their relevancy, materiality, or admissibility. Further, Plaintiff reserves the right to object to the admissibility into evidence of any document he produces in response to a specific request.
2. Plaintiff objects to any specific request for the production of documents to the extent that it seeks any document or other information that is not relevant to this action, nor reasonably calculated to lead to the discovery of admissible evidence.
3. Plaintiff objects to any specific request for the production of documents to the extent that it is vague, ambiguous, overbroad, unintelligible or unduly burdensome so as to render it impossible for Plaintiff to respond in a reasonable manner or amount of time.
4. Plaintiff objects to any specific request for the production of documents to the extent that it seeks documents or other information from third parties. Plaintiff will respond to

such a request only to the extent that any requested document or information exists and is within Plaintiff's possession or control.

5. Plaintiff objects to any specific request for the production of documents to the extent that it seeks to impose obligations greater than those imposed by the Federal Rules of Civil Procedure, the Local Rules of this Court or the directions or customs of the presiding Judge.

6. Plaintiff objects to any specific request for the production of documents to the extent that it seeks any document or other information that is protected from discovery by the attorney-client privilege, the deliberative process privilege, and/or the work-product doctrine. See **Exhibit B** for a copy of Plaintiff's privilege log.

7. Plaintiff objects to any specific request for the production of documents to the extent that it seeks the production of "all" or "any and all" documents or other information because such a request is vague, unduly burdensome and overbroad.

8. Plaintiff reserves his right to supplement and otherwise amend his response to any specific request for the production of documents. Plaintiff will respond to such a request to the extent a reasonable search of Plaintiff's records provides the documents or other information the Defendants request.

**PLAINTIFF'S RESPONSES TO, SPECIFIC OBJECTIONS TO,
AND RESERVATIONS CONCERNING DEFENDANT FATHI YUSUF'S
FIRST SET OF DOCUMENT REQUESTS TO PLAINTIFF**

REQUEST FOR PRODUCTION NO. 1

1. Please produce all documents, reports, writing, recordings or electronic information which relate in any way to the allegations set forth in your Complaint and Amended Complaint and/or upon which you intend to rely upon in support of your claims.

RESPONSE TO PRODUCTION NO. 1

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 2

2. To the extent that any documents were referenced or utilized in formulating a response to the Interrogatories served herewith by Fathi Yusuf, please produce any and all such documents and indicate to which Interrogatory they correspond.

RESPONSE TO PRODUCTION NO. 2

Those documents are identified in the Plaintiff's interrogatory responses.

REQUEST FOR PRODUCTION NO. 3

3. Please produce a listing of any and all email addresses and cell phone numbers which you utilized or which were utilized by any of your family members on your behalf from 1986 through the present.

RESPONSE TO PRODUCTION NO. 3

None. Mr. Hamed does not utilize email.

REQUEST FOR PRODUCTION NO. 4

4. Please produce any and all communications between yourself and Fathi Yusuf, in any form including electronic communications, such as email and text messages, written form or by way of tape or digital recording or voicemail evidencing your alleged partnership with Fathi Yusuf as alleged in your Complaint and Amended Complaint.

RESPONSE TO PRODUCTION NO. 4

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 5

5. Please provide copies of all financial records, including statements of account for all operating, savings, credit, investment, trust, or escrow accounts, Hamed may have opened in any bank in the Virgin Islands, and outside, including but not limited to the country of Jordan, and the West Bank, Palestine from 1986 through the present.

RESPONSE TO PRODUCTION NO. 5

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 6

6. Please produce all documents, writings, and recordings relating to each exhibit you intend to introduce into evidence at the trial of this case.

RESPONSE TO PRODUCTION NO. 6

Those documents have not yet been identified and will be provided once they are determined.

REQUEST FOR PRODUCTION NO. 7

7. Please produce a copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by or on behalf of Hamed, for any and all personal income (or loss) for the years 1986 through present.

RESPONSE TO PRODUCTION NO. 7

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 8

8. Please produce a copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by, or on Hamed's behalf, for any and all **business/professional** income (or loss) for the years 1986 through present.

RESPONSE TO PRODUCTION NO. 8

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 9

9. Please produce all documents provided to your accountants from 1986 through the present either for the preparation of tax returns, bookkeeping services, the preparation of financial statements, or loan applications.

RESPONSE TO PRODUCTION NO. 9

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 10

10. Please produce copies of any and all bank account statements, for any and all bank accounts (**foreign and domestic**), held individually or jointly in Hamed's name, or the name of any entity in which Hamed had or contends to have a legal interest from 1986 through present.

RESPONSE TO PRODUCTION NO. 10

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 11

11. Please produce a list of all accounts holding stocks, bonds, securities, or other negotiable instruments, not otherwise identified and/or provided pursuant to the above requests, held in Hamed's name, **and/or in the name of Hamed's wife, children, or other third parties**, in part or whole, or in which Hamed has a financial, personal or business interest/stake from 1986 through the present.

RESPONSE TO PRODUCTION NO. 11

None.

REQUEST FOR PRODUCTION NO. 12

12. Please produce deed(s), contract(s), lease(s), or other similar documentary evidence of Hamed's alleged ownership of any interest in real property from January 1, 1986 to present (regardless if you have transferred, sold, or otherwise disposed of these assets).

RESPONSE TO PRODUCTION NO. 12

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 13

13. Copies of all statements from any account, including all online based accounts, issued from January 1st, 1986 to present in connection with any brokerage accounts, relating to any stocks, bonds, stock options, debentures, and mutual funds, or other financial investment you may have had.

RESPONSE TO PRODUCTION NO. 13

None.

REQUEST FOR PRODUCTION NO. 14

14. All written evidence of any interest you have had in any business other than Plaza Extra Operations from January 1, 1986 to present.

RESPONSE TO PRODUCTION NO. 14

None.

REQUEST FOR PRODUCTION NO. 15

15. All copies of any loan applications you have applied for from 1986 to present.

RESPONSE TO PRODUCTION NO. 15

None.

REQUEST FOR PRODUCTION NO. 16

16. Please provide all documents, writings, and recordings relating to any distribution of funds, regardless of whether you deem them as distribution of profit or withdrawals from the operations of the Plaza Extra as stated in paragraph 20 of the Amended Complaint.

RESPONSE TO PRODUCTION NO. 16

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 17

17. Please produce all documents relating to all wire transfer to/from any accounts you have opened, maintained, and/or closed at any financial institution in the country of Jordan, Israel, Palestine, Europe, the United States, and the entire Middle East from 1986 through the present.

RESPONSE TO PRODUCTION NO. 17

None.

REQUEST FOR PRODUCTION NO. 18

18. Please produce a detailed set of financial statements showing the assets and liabilities of the purported partnership, including any income statements that may have been prepared on your behalf from 1986 through the present.

RESPONSE TO PRODUCTION NO. 18

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**. Additionally, please see the Sage 50 back ups for each of the three Plaza Extra Stores. The file names on the disk for the Sage 50 back ups are United Corporation East-112113.ptb, United Corporation STT-112213.ptb and United Corporation West-112113.

REQUEST FOR PRODUCTION NO. 19

19. Please produce all documents supporting your allegations in Paragraph 28 of the Complaint.

RESPONSE TO FOR PRODUCTION NO. 19

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows:

The amount of compensatory damages for all financial losses has not been fully calculated. This will be the subject of the accountant's expert report. See **Exhibit A – List of Documents Produced** for documents relating to this request.

REQUEST FOR PRODUCTION NO. 20

20. Please produce all documents supporting your allegations in Paragraph 33 through 46 of the Amended Complaint. Please specify the paragraph number of the Amended Complaint to EACH document you produce in response thereto.

RESPONSES TO PRODUCTION NO. 20

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows:

The amount of damages for all financial losses has not been fully calculated. This will be the subject of the accountant's expert report. However, see **Exhibit A – List of Documents Produced** for documents relating to this request.

REQUEST FOR PRODUCTION NO. 21

21. Please produce all documents evidencing your appointment of Waleed Hamed as your agent and any communication reflecting this designation to Fathi Yusuf.

RESPONSE TO PRODUCTION NO. 21

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 22

22. Please produce any documentation as to the losses of the alleged partnership for which you understand you are or may be liable.

RESPONSE TO PRODUCTION NO. 22

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

REQUEST FOR PRODUCTION NO. 23

23. Please produce any documentation demonstrating your public representations as to being in a partnership with Fathi Yusuf as you have alleged in your Complaint and Amended Complaint.

RESPONSE TO PRODUCTION NO. 23

Plaintiff incorporates objections 1-7 herein by reference. Subject to the comment set forth in item 8 of the general objections and reservations, Plaintiff responds to this request as follows: with respect to specific responsive documents, Plaintiff makes reference to the attached **Exhibit A – List of Documents Produced**.

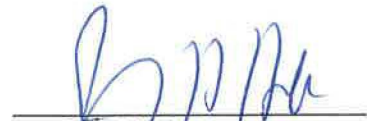
REQUEST FOR PRODUCTION NO. 24

24. Please produce any and all evidence as to the damages you contend that you have suffered and which support your calculations as to damages.

RESPONSE TO PRODUCTION NO. 24

The amount of damages for all financial losses has not been fully calculated. This will be the subject of the accountant's expert report.

Dated: December 23, 2013



Joel H. Holt, Esq.
Counsel for Plaintiff
2132 Company Street,
Christiansted, VI 00820

Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Est. Coakley Bay, L6
Christiansted, VI 00820

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of December 2013, I served a copy of the foregoing Reply by hand on:

Nizar A. DeWood
The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820

And by email (ghodges@dtflaw.com) and mail to:

Greg H. Hodges
Dudley, Topper and Feuerzeig, LLP
Law House
1000 Fredericksberg Gade
P. O. Box 756
St. Thomas, VI 00804



Joel H. Holt, Esq.

Exhibit A -- List of Documents Produced
Hamed v Yusuf (STX-12-CV-370)
December 23, 2013

Bates Range	Plaintiff's Responses to Defendants' RFPDs
HAMD200230-HAMD200268	1
HAMD200519-HAMD200608	1
HAMD201615-HAMD201663	1
HAMD201664-HAMD201712	1
HAMD203409-HAMD203410	1
HAMD243049-HAMD243058	1
HAMD261956-HAMD261959	1
HAMD261982-HAMD261990	1
HAMD262005-HAMD262006	1
HAMD262104-HAMD262120	1
HAMD588847-HAMD588848	1
HAMD589085-HAMD589085	1
HAMD590853-HAMD590877	1
HAMD590878-HAMD590896	1
HAMD590897-HAMD590915	1
HAMD591186-HAMD591200	1
HAMD591466-HAMD591485	1
HAMD591534-HAMD591542	1
HAMD592647R-HAMD592647R	1
HAMD594276-HAMD594276	1
HAMD594277-HAMD594277	1
HAMD594358-HAMD594358	1
HAMD594455-HAMD594458	1
HAMD203778-HAMD203792	1, 4
HAMD564613-HAMD564637	1, 4, 19, 20 [para 35, 36, 37, 38, 40, 41, 42, 45, 46], 22, 23
HAMD562848-HAMD563177	1, 4, 19, 20 [para 33, 35, 36, 37, 38, 40, 41, 42, 44, 45, 46], 21, 22, 23
HAMD261949-HAMD261953	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD261991-HAMD262004	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD262048-HAMD262103	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD591702-HAMD591724	1, 4, 20 [para 35, 37, 40, 41, 44, 45, 46], 21, 22, 23
HAMD200633-HAMD200666	1, 4, 20 [para 35, 41] & 23
HAMD262018-HAMD262047	1, 4, 20 [para 35, 41] 21, 23
HAMD262121-HAMD262123	1, 4, 20 [para 35, 41] 21, 23
HAMD277512-HAMD277517	1, 4, 20 [para 35, 41], 21, 22, 23
HAMD203806-HAMD203839	1, 4, 20 [para 35, 41], 23
HAMD243063-HAMD243096	1, 4, 20 [para 35, 41], 23
HAMD590682-HAMD590699	1, 4, 20 [para 35, 41], 23
HAMD200212-HAMD200216	1, 4, 20 [para 35], 21, & 23
HAMD200149-HAMD200150	1, 4, 20 [para 35], 21, & 23
HAMD203010-HAMD203047	1, 4, 20 [para 35], 22, 23
HAMD203844-HAMD203875	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD203876-HAMD203888	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD243097-HAMD243100	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23

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Bates Range	Plaintiff's Responses to Defendants' RFPDs
HAMD243101-HAMD243132	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD243133-HAMD243145	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD247596-HAMD247691	1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD594603-HAMD594673	1, 5
HAMD594674-HAMD594675	1, 5
HAMD588470-HAMD588506	1, 8, 16
HAMD202366-HAMD202423	1, 16
HAMD247700-HAMD247701	1, 16
HAMD247702-HAMD247743	1, 16
HAMD247744-HAMD247745	1, 16
HAMD247746-HAMD247746	1, 16
HAMD247747-HAMD247748	1, 16
HAMD247749-HAMD247750	1, 16
HAMD431995-HAMD432001	1, 16
HAMD445784-HAMD445784	1, 16
HAMD587975-HAMD587977	1, 16
HAMD589101-HAMD589112	1, 16
HAMD589113-HAMD589142	1, 16
HAMD589143-HAMD589160	1, 16
HAMD589492-HAMD589529	1, 16
HAMD592229-HAMD592234	1, 16
HAMD592237-HAMD592249	1, 16
HAMD211578-HAMD211578	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211883-HAMD211886	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211891-HAMD211891	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211926-HAMD211926	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211949-HAMD21194	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211971-HAMD211971	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211972-HAMD211973	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD211985-HAMD211985	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212257-HAMD212257	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212423-HAMD212423	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212431-HAMD212431	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212433-HAMD212433	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212659-HAMD212659	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212696-HAMD212696	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212787-HAMD212787	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212877-HAMD212877	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212887-HAMD212891	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212907-HAMD212907	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212922-HAMD212922	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212927-HAMD212928	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212939-HAMD212939	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD212973-HAMD212974	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]

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Bates Range	Plaintiff's Responses to Defendants' RFPDs
HAMD213083-HAMD213083	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD213102-HAMD213102	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD213103-HAMD213103	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD213111-HAMD213111	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD213130-HAMD213130	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD213155-HAMD213155	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD255164-HAMD255165	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD255166-HAMD255167	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD255290-HAMD255291	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD261905R-HAMD261924R	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD261925R-HAMD261938R	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD580428-HAMD580431	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD580439-HAMD580446	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD580605-HAMD580606	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592169-HAMD592198	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592633-HAMD592633	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592634-HAMD592634	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592635-HAMD592635	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592636-HAMD592636	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592637-HAMD592637	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592638-HAMD592638	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592639-HAMD592639	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592640-HAMD592640	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592641-HAMD592641	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592642-HAMD592642	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592643-HAMD592643	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592644-HAMD592644	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592645-HAMD592646	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592648-HAMD592648	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592649-HAMD592650	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592651-HAMD592651	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592652-HAMD592653	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592654-HAMD592654	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592655-HAMD592656	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592657-HAMD592657	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592658-HAMD592658	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592659-HAMD592659	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592660-HAMD592660	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592661-HAMD592661	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592662-HAMD592662	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592663-HAMD592663	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592664-HAMD592664	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592665-HAMD592665	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592667R-HAMD592668R	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]

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Bates Range	Plaintiff's Responses to Defendants' RFPDs
HAMD592669-HAMD592669	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592670-HAMD592671	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592672-HAMD592672	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592673-HAMD592673	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592674-HAMD592674	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592675-HAMD592675	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592676-HAMD592676	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592677-HAMD592678	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592679-HAMD592679	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592680-HAMD592680	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592681-HAMD592681	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592682-HAMD592682	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592683-HAMD592683	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592684-HAMD592684	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592685-HAMD592685	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592686-HAMD592686	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592687-HAMD592687	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592688-HAMD592688	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
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HAMD592690-HAMD592692	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592693-HAMD592695	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592696-HAMD592696	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592697-HAMD592697	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592698-HAMD592698	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592699-HAMD592699	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592700-HAMD592700	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592701-HAMD592702	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592703-HAMD592704	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592705-HAMD592706	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592707-HAMD592709	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592710-HAMD592711	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592712-HAMD592714	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592715-HAMD592717	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592718-HAMD592718	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592719-HAMD592720	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592721-HAMD592723	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592724-HAMD592724	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592725-HAMD592727	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592728-HAMD592730	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592731-HAMD592731	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592732-HAMD592732	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592733-HAMD592739	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592740-HAMD592741	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592742-HAMD592745	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]

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HAMD592750-HAMD592752	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592753-HAMD592755	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592756-HAMD592757	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592758-HAMD592760	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592761-HAMD592762	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592763-HAMD592765	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592766-HAMD592771	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592772-HAMD592774	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592775-HAMD592776	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592777-HAMD592779	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592780-HAMD592781	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592782-HAMD592783	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592784-HAMD592787	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592788-HAMD592792	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592793-HAMD592798	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592799-HAMD592801	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592802-HAMD592805	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592806-HAMD592808	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592809-HAMD592811	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592812-HAMD592813	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592814-HAMD592815	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592816-HAMD592818	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592819-HAMD592820	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592821-HAMD592822	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592823-HAMD592824	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592825-HAMD592826	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592827-HAMD592829	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592830-HAMD592831	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592832-HAMD592835	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592836-HAMD592837	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592838-HAMD592839	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592840-HAMD592844	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
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HAMD592846-HAMD592847	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592848-HAMD592850	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592851-HAMD592853	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592854-HAMD592854	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592855-HAMD592857	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592858-HAMD592860	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592861-HAMD592865	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592866-HAMD592866	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592867-HAMD592868	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592869-HAMD592871	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]

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HAMD592875-HAMD592876	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592877-HAMD592880	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592883-HAMD592883	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592881-HAMD592882	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592884-HAMD592885	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592886-HAMD592887	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592888-HAMD592888	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592889-HAMD592889	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592890-HAMD592890	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592891-HAMD592891	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592892-HAMD592892	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592893-HAMD592893	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592894-HAMD592894	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
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HAMD592896-HAMD592896	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
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HAMD592903-HAMD592903	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592904-HAMD592904	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592905-HAMD592905	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592906-HAMD592906	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592907-HAMD592907	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592910-HAMD592911	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592912-HAMD592913	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592914-HAMD592915	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592916-HAMD592917	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD592918-HAMD592919	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD593177-HAMD593178	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD593179-HAMD593181	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD593182-HAMD593185	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD593186-HAMD593187	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD593188-HAMD593189	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD593190-HAMD593191	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD594275-HAMD594275	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD594283-HAMD594283	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD594676-HAMD594676	1, 19, 20 [para 35, 37, 38, 40, 42, 44, 45, 46]
HAMD202999-HAMD203002	1, 19, 20 [para 40, 42]
HAMD592008-HAMD592040	1, 19, 20 [para 40, 42]
HAMD594357-HAMD594357	1, 19, 20 [para 40, 42]

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HAMD589381-HAMD589381	1, 19, 20 [para 42]
HAMD589442-HAMD589442	1, 19, 20 [para 42]
HAMD591230-HAMD591230	1, 19, 20 [para 42]
HAMD591446-HAMD591465	1, 19, 20 [para 42]
HAMD591985-HAMD591990	1, 19, 20 [para 42]
HAMD591991-HAMD592006	1, 19, 20 [para 42]
HAMD592007-HAMD592007	1, 19, 20 [para 42]
HAMD200085-HAMD200088	1, 20 [para 35]
HAMD211371-HAMD211371	1, 20 [para 35]
HAMD211372-HAMD211372	1, 20 [para 35]
HAMD211373-HAMD211373	1, 20 [para 35]
HAMD211377-HAMD211377	1, 20 [para 35]
HAMD211403-HAMD211404	1, 20 [para 35]
HAMD211405-HAMD211406	1, 20 [para 35]
HAMD211407-HAMD211407	1, 20 [para 35]
HAMD211408-HAMD211408	1, 20 [para 35]
HAMD211409-HAMD211409	1, 20 [para 35]
HAMD211410-HAMD211410	1, 20 [para 35]
HAMD211937-HAMD211937	1, 20 [para 35]
HAMD211939-HAMD211939	1, 20 [para 35]
HAMD211941-HAMD211941	1, 20 [para 35]
HAMD211995-HAMD211995	1, 20 [para 35]
HAMD211997-HAMD211997	1, 20 [para 35]
HAMD211998-HAMD211998	1, 20 [para 35]
HAMD211999-HAMD211999	1, 20 [para 35]
HAMD212002-HAMD212002	1, 20 [para 35]
HAMD212003-HAMD212003	1, 20 [para 35]
HAMD212005-HAMD212005	1, 20 [para 35]
HAMD212006-HAMD212006	1, 20 [para 35]
HAMD212007-HAMD212007	1, 20 [para 35]
HAMD212533-HAMD212533	1, 20 [para 35]
HAMD212709-HAMD212709	1, 20 [para 35]
HAMD212710-HAMD212710	1, 20 [para 35]
HAMD212711-HAMD212711	1, 20 [para 35]
HAMD212712-HAMD212712	1, 20 [para 35]
HAMD212726-HAMD212726	1, 20 [para 35]
HAMD213085-HAMD213085	1, 20 [para 35]
HAMD213097-HAMD213097	1, 20 [para 35]
HAMD213098-HAMD213098	1, 20 [para 35]
HAMD213107-HAMD213107	1, 20 [para 35]
HAMD213110-HAMD213110	1, 20 [para 35]
HAMD213114-HAMD213114	1, 20 [para 35]
HAMD213123-HAMD213123	1, 20 [para 35]

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HAMD213128-HAMD213128	1, 20 [para 35]
HAMD213129-HAMD213129	1, 20 [para 35]
HAMD213134-HAMD213134	1, 20 [para 35]
HAMD213136-HAMD213136	1, 20 [para 35]
HAMD213137-HAMD213137	1, 20 [para 35]
HAMD213139-HAMD213139	1, 20 [para 35]
HAMD213140-HAMD213140	1, 20 [para 35]
HAMD213142-HAMD213142	1, 20 [para 35]
HAMD213143-HAMD213143	1, 20 [para 35]
HAMD213148-HAMD213148	1, 20 [para 35]
HAMD213152-HAMD213152	1, 20 [para 35]
HAMD227914-HAMD227914	1, 20 [para 35]
HAMD227916-HAMD227916	1, 20 [para 35]
HAMD227917-HAMD227917	1, 20 [para 35]
HAMD227918-HAMD227918	1, 20 [para 35]
HAMD227919-HAMD227919	1, 20 [para 35]
HAMD227920-HAMD227920	1, 20 [para 35]
HAMD227921-HAMD227921	1, 20 [para 35]
HAMD227922-HAMD227922	1, 20 [para 35]
HAMD227923-HAMD227923	1, 20 [para 35]
HAMD227924-HAMD227924	1, 20 [para 35]
HAMD227925-HAMD227925	1, 20 [para 35]
HAMD227926-HAMD227926	1, 20 [para 35]
HAMD227927-HAMD227927	1, 20 [para 35]
HAMD227928-HAMD227928	1, 20 [para 35]
HAMD227929-HAMD227929	1, 20 [para 35]
HAMD227930-HAMD227930	1, 20 [para 35]
HAMD227931-HAMD227931	1, 20 [para 35]
HAMD227937-HAMD227937	1, 20 [para 35]
HAMD227940-HAMD227940	1, 20 [para 35]
HAMD227941-HAMD227941	1, 20 [para 35]
HAMD227942-HAMD227942	1, 20 [para 35]
HAMD227943-HAMD227943	1, 20 [para 35]
HAMD227944-HAMD227944	1, 20 [para 35]
HAMD227946-HAMD227946	1, 20 [para 35]
HAMD227947-HAMD227947	1, 20 [para 35]
HAMD227948-HAMD227948	1, 20 [para 35]
HAMD227949-HAMD227949	1, 20 [para 35]
HAMD227950-HAMD227951	1, 20 [para 35]
HAMD227952-HAMD227952	1, 20 [para 35]
HAMD227953-HAMD227953	1, 20 [para 35]
HAMD227954-HAMD227955	1, 20 [para 35]
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HAMD227958-HAMD227958	1, 20 [para 35]
HAMD227959-HAMD227959	1, 20 [para 35]
HAMD227970-HAMD227970	1, 20 [para 35]
HAMD243205-HAMD243236	1, 20 [para 35]
HAMD243286-HAMD243288	1, 20 [para 35]
HAMD564770-HAMD564834	1, 20 [para 35]
HAMD587856-HAMD587863	1, 20 [para 35]
HAMD591980-HAMD591980	1, 20 [para 35]
HAMD591981-HAMD591981	1, 20 [para 35]
HAMD591982-HAMD591982	1, 20 [para 35]
HAMD591983-HAMD591983	1, 20 [para 35]
HAMD591984-HAMD591984	1, 20 [para 35]
HAMD592493-HAMD592504	1, 20 [para 35]
HAMD200160-HAMD200211	1, 20 [para 35], 21 & 23
HAMD590636-HAMD590656	1, 20 [para 35, 37, 41, 44, 45]
HAMD261005-HAMD261157	1, 20 [para 37, 40, 41, 42, 44, 45, 46]
HAMD588968-HAMD588975	1, 20 [para 37, 44, 45]
HAMD200746-HAMD200815	4, 20 [para 35, 41], 23
HAMD594677-HAMD594678	5, 10
HAMD594679-HAMD594681	5, 10
HAMD594682-HAMD594684	5, 10
HAMD592250-HAMD592259	7
HAMD592260-HAMD592273	7
HAMD592274-HAMD592288	7
HAMD592289-HAMD592303	7
HAMD592304-HAMD592316	7
HAMD592317-HAMD592329	7
HAMD592330-HAMD592349	7
HAMD592350-HAMD592365	7
HAMD592366-HAMD592383	7
HAMD592384-HAMD592395	7
HAMD592402-HAMD592431	7
HAMD277325-HAMD277354	8
HAMD593236-HAMD593238	8, 9, 16
HAMD593281-HAMD593289	8, 9, 16
HAMD593330-HAMD593338	8, 9, 16
HAMD593442-HAMD593448	8, 9, 16
HAMD593479-HAMD593487	8, 9, 16
HAMD593521-HAMD593528	8, 9, 16
HAMD593562-HAMD593568	8, 9, 16
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HAMD593653-HAMD593661	8, 9, 16
HAMD593689-HAMD593693	8, 9, 16
HAMD593694-HAMD593699	8, 9, 16
HAMD593700-HAMD593707	8, 9, 16
HAMD593708-HAMD593744	8, 9, 16
HAMD593745-HAMD593776	8, 9, 16
HAMD593785-HAMD593786	8, 9, 16
HAMD593787-HAMD593787	8, 9, 16
HAMD593195-HAMD593235	9
HAMD593243-HAMD593280	9
HAMD593294-HAMD593329	9
HAMD593347-HAMD593374	9
HAMD593381-HAMD593411	9
HAMD593412-HAMD593434	9
HAMD593449-HAMD593470	9
HAMD593488-HAMD593513	9
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HAMD593569-HAMD593603	9
HAMD593621-HAMD593648	9
HAMD593662-HAMD593688	9
HAMD593777-HAMD593780	9
HAMD593788-HAMD593792	9
HAMD593239-HAMD593240	9, 16
HAMD593241-HAMD593242	9, 16
HAMD593290-HAMD593291	9, 16
HAMD593292-HAMD593293	9, 16
HAMD593339-HAMD593342	9, 16
HAMD593343-HAMD593346	9, 16
HAMD593375-HAMD593377	9, 16
HAMD593378-HAMD593380	9, 16
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HAMD593555-HAMD593558	9, 16
HAMD593559-HAMD593561	9, 16
HAMD593781-HAMD593782	9, 18
HAMD593783-HAMD593784	9, 18
HAMD593793-HAMD593795	9, 18
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HAMD593800-HAMD593813	10
HAMD593814-HAMD593814	10
HAMD593815-HAMD593815	10
HAMD593816-HAMD593816	10
HAMD593817-HAMD593817	10
HAMD593818-HAMD593818	10
HAMD593819-HAMD593819	10
HAMD593820-HAMD593820	10
HAMD593821-HAMD593821	10
HAMD593822-HAMD593822	10
HAMD593823-HAMD593823	10
HAMD593824-HAMD593824	10
HAMD593825-HAMD593825	10
HAMD593826-HAMD593885	10
HAMD593886-HAMD593945	10
HAMD593946-HAMD593955	10
HAMD593956-HAMD593973	10
HAMD593974-HAMD594001	10
HAMD594002-HAMD594071	10
HAMD594072-HAMD594146	10
HAMD594147-HAMD594188	10
HAMD594189-HAMD594214	10
HAMD594215-HAMD594246	10
HAMD594247-HAMD594267	10
HAMD594268-HAMD594270	12
HAMD594271-HAMD594272	12
HAMD594279-HAMD594282	12
HAMD592235-HAMD592236	21
HAMD592398-HAMD592401	21
HAMD592432-HAMD592443	21
The documents below were produced as part of Plaintiff's Rule 26 disclosures on 7/16/2013	
HAMD200062-HAMD200062	7/16/2013 Prod: 1
HAMD200063-HAMD200063	7/16/2013 Prod: 1
HAMD200064-HAMD200064	7/16/2013 Prod: 1
HAMD200065-HAMD200073	7/16/2013 Prod: 1
HAMD200076-HAMD200079	7/16/2013 Prod: 1
HAMD200106-HAMD200106	7/16/2013 Prod:1
HAMD202972-HAMD202973	7/16/2013 Prod:1
HAMD243333-HAMD243339	7/16/2013 Prod:1
HAMD261642-HAMD261646	7/16/2013 Prod:1
HAMD261647-HAMD261651	7/16/2013 Prod:1

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HAMD262007-HAMD262014	7/16/2013 Prod:1
HAMD262015-HAMD262017	7/16/2013 Prod:1
HAMD262124-HAMD262131	7/16/2013 Prod:1
HAMD262135-HAMD262142	7/16/2013 Prod: 1
HAMD262155-HAMD262157	7/16/2013 Prod: 1
HAMD262158-HAMD262159	7/16/2013 Prod: 1
HAMD262160-HAMD262169	7/16/2013 Prod: 1
HAMD262170-HAMD262171	7/16/2013 Prod: 1
HAMD262172-HAMD262173	7/16/2013 Prod: 1
HAMD262174-HAMD262181	7/16/2013 Prod: 1
HAMD262182-HAMD262191	7/16/2013 Prod: 1
HAMD262192-HAMD262195	7/16/2013 Prod: 1
HAMD262196-HAMD262203	7/16/2013 Prod: 1
HAMD262204-HAMD262215	7/16/2013 Prod: 1
HAMD262216-HAMD262225	7/16/2013 Prod: 1
HAMD262229-HAMD262239	7/16/2013 Prod: 1
HAMD262241-HAMD262247	7/16/2013 Prod: 1
HAMD262248-HAMD262256	7/16/2013 Prod:1
HAMD563388-HAMD563393	7/16/2013 Prod:1
HAMD587903-HAMD587914	7/16/2013 Prod:1
HAMD589587-HAMD589588	7/16/2013 Prod:1
HAMD201327-HAMD201422	7/16/2013 Prod:1, 4, 20 [para 35, 40, 41, 42, 45] 22, 23
HAMD200007-HAMD200021	7/16/2013 Prod:1, 4, 20 [para 35, 41], 23
HAMD588295-HAMD588295	7/16/2013 Prod:1, 7, 19, 20 [para 42]
HAMD588294-HAMD588294	7/16/2013 Prod:1, 7, 19, 20 [para 42]
HAMD588461-HAMD588469	7/16/2013 Prod:1, 8, 16
HAMD588507-HAMD588538	7/16/2013 Prod:1, 8, 16
HAMD588539-HAMD588546	7/16/2013 Prod:1, 8, 16
HAMD588547-HAMD588583	7/16/2013 Prod:1, 8, 16
HAMD588584-HAMD588615	7/16/2013 Prod:1, 8, 16
HAMD200093-HAMD200099	7/16/2013 Prod:1, 16
HAMD200900-HAMD200902	7/16/2013 Prod:1, 16
HAMD203062-HAMD203065	7/16/2013 Prod:1, 16
HAMD203434-HAMD203434	7/16/2013 Prod:1, 16
HAMD203435-HAMD203435	7/16/2013 Prod: 1, 16
HAMD203436-HAMD203437	7/16/2013 Prod:1, 16
HAMD203438-HAMD203439	7/16/2013 Prod:1, 16
HAMD203440-HAMD203441	7/16/2013 Prod:1, 16
HAMD203442-HAMD203443	7/16/2013 Prod:1, 16
HAMD203444-HAMD203448	7/16/2013 Prod:1, 16
HAMD203455-HAMD203456	7/16/2013 Prod:1, 16
HAMD203457-HAMD203457	7/16/2013 Prod:1, 16
HAMD203458-HAMD203459	7/16/2013 Prod:1, 16
HAMD203460-HAMD203462	7/16/2013 Prod:1, 16

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HAMD203463-HAMD203465	7/16/2013 Prod: 1, 16
HAMD203466-HAMD203475	7/16/2013 Prod:1, 16
HAMD203476-HAMD203476	7/16/2013 Prod:1, 16
HAMD203477-HAMD203477	7/16/2013 Prod:1, 16
HAMD203478-HAMD203478	7/16/2013 Prod:1, 16
HAMD203479-HAMD203482	7/16/2013 Prod:1, 16
HAMD203483-HAMD203484	7/16/2013 Prod:1, 16
HAMD203485-HAMD203486	7/16/2013 Prod:1, 16
HAMD203487-HAMD203506	7/16/2013 Prod:1, 16
HAMD203507-HAMD203517	7/16/2013 Prod:1, 16
HAMD203518-HAMD203523	7/16/2013 Prod:1, 16
HAMD203524-HAMD203530	7/16/2013 Prod:1, 16
HAMD203531-HAMD203531	7/16/2013 Prod:1, 16
HAMD203533-HAMD203631	7/16/2013 Prod:1, 16
HAMD243361-HAMD243368	7/16/2013 Prod:1, 16
HAMD562208-HAMD562218	7/16/2013 Prod: 1, 16
HAMD562253-HAMD562253	7/16/2013 Prod: 1, 16
HAMD562304-HAMD562308	7/16/2013 Prod:1, 16
HAMD564382-HAMD564382	7/16/2013 Prod:1, 16
HAMD587936-HAMD587944	7/16/2013 Prod:1, 16
HAMD587945-HAMD587949	7/16/2013 Prod:1, 16
HAMD587950-HAMD587956	7/16/2013 Prod:1, 16
HAMD587957-HAMD587963	7/16/2013 Prod:1, 16
HAMD587964-HAMD587974	7/16/2013 Prod: 1, 16
HAMD588616-HAMD588621	7/16/2013 Prod: 1, 16
HAMD588622-HAMD588627	7/16/2013 Prod: 1, 16
HAMD588628-HAMD588633	7/16/2013 Prod:1, 16
HAMD588665-HAMD588669	7/16/2013 Prod:1, 16
HAMD588670-HAMD588674	7/16/2013 Prod: 1, 16
HAMD588675-HAMD588679	7/16/2013 Prod: 1, 16
HAMD261899-HAMD261902	7/16/2013 Prod: 1, 18
HAMD261672-HAMD261676	7/16/2013 Prod: 1, 18
HAMD200081-HAMD200084	7/16/2013 Prod: 1, 19, 20 [para 36, 37, 38, 40, 41, 42, 44, 45, 46]
HAMD200058-HAMD200058	7/16/2013 Prod: 1, 19, 20 [para 36, 38, 40, 42, 45]
HAMD200059-HAMD200059	7/16/2013 Prod: 1, 19, 20 [para 36, 38, 40, 42, 45]
HAMD200060-HAMD200061	7/16/2013 Prod: 1, 19, 20 [para 36, 38, 40, 42, 45]
HAMD563315-HAMD563315	7/16/2013 Prod: 1, 19, 20 [para 36, 38, 40, 42, 45]
HAMD563377-HAMD563378	7/16/2013 Prod: 1, 19, 20 [para 36, 38, 40, 42, 45]
HAMD203422-HAMD203423	7/16/2013 Prod:1, 19, 20 [para 37, 42, 44, 45]
HAMD261896-HAMD261897	7/16/2013 Prod: 1, 19, 20 [para 37, 42, 44, 45]
HAMD262240-HAMD262240	7/16/2013 Prod:1, 19, 20 [para 37, 42, 44, 45]
HAMD277362-HAMD277363	7/16/2013 Prod:1, 19, 20 [para 37, 42, 44, 45]
HAMD562193-HAMD562194	7/16/2013 Prod: 1, 19, 20 [para 37, 42, 44, 45]

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HAMD562231-HAMD562232	7/16/2013 Prod: 1, 19, 20 [para 37, 42, 44, 45]
HAMD200074-HAMD200074	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD200075-HAMD200075	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD200080-HAMD200080	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD200100-HAMD200100	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD200101-HAMD200101	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD200107-HAMD200107	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD200817-HAMD200817	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD202975-HAMD202976	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD202985-HAMD202985	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD203432-HAMD203432	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD243352-HAMD243352	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD261898-HAMD261898	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD562189-HAMD562189	7/16/2013 Prod: 1, 19, 20 [para 40, 42]
HAMD562327-HAMD562327	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD583763-HAMD583763	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD583764-HAMD583764	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD588686-HAMD588686	7/16/2013 Prod:1, 19, 20 [para 40, 42]
HAMD200103-HAMD200103	7/16/2013 Prod:1, 19, 20 [para 42]
HAMD200104-HAMD200104	7/16/2013 Prod:1, 19, 20 [para 42]
HAMD200105-HAMD200105	7/16/2013 Prod:1, 19, 20 [para 42]
HAMD260749-HAMD261003	7/16/2013 Prod:1, 19, 20 [para 42]
HAMD562207-HAMD562207	7/16/2013 Prod:1, 19, 20 [para 42]
HAMD562624-HAMD562630	7/16/2013 Prod:1, 19, 20 [para 42]
HAMD200089-HAMD200092	7/16/2013 Prod: 1, 20 [para 35]
HAMD243328-HAMD243328	7/16/2013 Prod: 1, 20 [para 36, 38, 40, 42, 45]
HAMD203764-HAMD203767	7/16/2013 Prod: 1, 20 [para 37, 38, 40, 42, 44, 46]
HAMD583762-HAMD583762	7/16/2013 Prod: 1, 20 [para 37, 40, 42, 46]
HAMD200102-HAMD200102	7/16/2013 Prod: 1, 20 [para 37, 44, 45]
HAMD261652-HAMD261656	7/16/2013 Prod: 1, 20 [para 37, 44, 45]
HAMD261893-HAMD261895	7/16/2013 Prod: 1, 20 [para 37, 44, 45]
HAMD261903-HAMD261904	7/16/2013 Prod: 1, 20 [para 37, 44, 45]
HAMD562219-HAMD562220	7/16/2013 Prod: 1, 20 [para 37, 44, 45]
HAMD588658-HAMD588664	7/16/2013 Prod: 1, 20 [para 37, 44, 45]
HAMD202974-HAMD202974	7/16/2013 Prod:1, 20 [para 37, 40, 42, 46]
HAMD261659-HAMD261671	7/16/2013 Prod:1, 20 [para 37, 40, 44, 45]
HAMD261939-HAMD261948	7/16/2013 Prod:1, 20 [para 37, 40, 44, 45]
HAMD562195-HAMD562195	7/16/2013 Prod:1, 20 [para 37, 44, 45]
HAMD562144-HAMD562156	7/16/2013 Prod: 7
HAMD277399-HAMD277433	7/16/2013 Prod: 8
HAMD562167-HAMD562173	7/16/2013 Prod: 8
HAMD563333-HAMD563334	7/16/2013 Prod: 8
HAMD563335-HAMD563338	7/16/2013 Prod: 8
HAMD203449-HAMD203454	7/16/2013 Prod:16

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HAMD262132-HAMD262134	7/16/2013 Prod:18
HAMD262143-HAMD262150	7/16/2013 Prod:18
HAMD262151-HAMD262154	7/16/2013 Prod:18
HAMD262226-HAMD262228	7/16/2013 Prod:18
HAMD262257-HAMD262265	7/16/2013 Prod:18
HAMD262266-HAMD262274	7/16/2013 Prod:18
HAMD262275-HAMD262283	7/16/2013 Prod:18
HAMD562372-HAMD562376	7/16/2013 Prod:18

**Exhibit B -- Privilege Log
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Bates Range	Date	Document Type	Privilege Type	To/Recipient(s)	From/ Author(s)	Copied To	BCC'd To	Privilege Notes
HAMD592045- HAMD592071	NA	Yusuf Chit	Atty-Client and Atty Work Product	Joel Holt, Carl Hartmann	Mufed Hamed	N/A	N/A	Notes from attorney/client conversation about Yusuf 2001 chits
HAMD592082- HAMD592168	NA	Hamed Chit	Atty-Client and Atty Work Product	Joel Holt, Carl Hartmann	Mufed Hamed	N/A	N/A	Summary of Hamed chits, with notes between attorney and client affixed to each page. See Defendants' Bates #: 0112036-0112123 for original document.
HAMD592505- HAMD592601	NA	Hamed Chit	Atty-Client and Atty Work Product	Joel Holt, Carl Hartmann	Mufed Hamed	N/A	N/A	Summary of Hamed chits, with notes between attorney and client affixed to each page. See Defendants' Bates #: 0112036-0112123 for original document.
HAMD592602- HAMD592632	NA	Yusuf Chit	Atty-Client and Atty Work Product	Joel Holt, Carl Hartmann	Mufed Hamed	N/A	N/A	Notes from attorney/client conversation about Yusuf 2001 chits and attorney summary
HAMD592647- HAMD592647	NA	Notes	Atty-Client	Joel Holt	Waleed Hamed	N/A	N/A	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD592647R-HAMD592647R
HAMD261905- HAMD261924	??/??/01	Check	Atty-Client	Joel Holt	Waleed Hamed	N/A	N/A	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD261905R-HAMD261924R
HAMD261925- HAMD261938	??/??/02	Check	Atty-Client	Joel Holt	Waleed Hamed	N/A	N/A	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD261925R-HAMD261938R
HAMD592667- HAMD592668	9/15/2002	Check	Atty-Client	Joel Holt	Waleed Hamed	N/A	N/A	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD592667R-HAMD592668R
HAMD592454- HAMD592454	11/14/2013	Letter	Atty Work Product	Donovan Hamm	Joel Holt	N/A	N/A	Letter regarding documents provided to Attorney Donovan Hamm
HAMD593192- HAMD593192	12/9/2013	Letter	Atty Work Product	Donovan Hamm	Joel Holt	N/A	N/A	Letter regarding expert report