

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

MOHAMMAD HAMED, by his
authorized agent **WALEED HAMED**,

Plaintiff/Counterclaim Defendant,

vs.

FATHI YUSUF and
UNITED CORPORATION,

Defendants/Counterclaimants,

vs.

**WALEED HAMED, WAHEED
HAMED, MUFEED HAMED,
HISHAM HAMED,
and PLESSEN ENTERPRISES, INC.,**

Counterclaim Defendants.

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF

JURY TRIAL DEMANDED

**COUNTERCLAIM DEFENDANT WAHEED HAMED'S REQUEST FOR THE
PRODUCTION OF DOCUMENTS TO FATHI YUSUF AND UNITED CORPORATION**

Plaintiff Hamed, by counsel, propounds the following request for production of documents pursuant to Rule 34 of the Federal Rules of Civil Procedure as well as Local Rule 22 on defendants Fathi Yusuf and United Corporation (also referred to herein as "Defendant").

INSTRUCTIONS

1. The obligations imposed by Fed. R. Civ. P. 26 and 34 are hereby incorporated, including but not limited to, the duty to supplement imposed by Fed. R. Civ. P. 26(e).
2. These requests for production concern all information within Fathi Yusuf and/or United's custody and control.
3. If Defendant believes any information the Plaintiff requests is privileged and /or protected, in whole or in part, the Defendant shall provide the following: a) the

document's title; b) the document type (e.g., memorandum, letter, report, email etc.), c) the name, address and telephone number of each author or signatory; d) the name, address and telephone number of each recipient; e) the date the document was prepared; f) the privilege(s) and /or protection(s) the Defendant is asserting; g) the factual bases for the Defendant asserting the privilege(s) and for protection(s); and h) a summary of the information the Defendant is not producing to enable a court of competent jurisdiction to rule whether the information is privileged and /or protected.

4. Whenever these requests for production use any word in the plural, the Defendant shall understand the word to include the singular as necessary to make the request for production inclusive rather than exclusive. Further, whenever these requests for production use any word in the singular, the Defendant shall understand the word to include the plural as necessary to make the request for production inclusive rather than exclusive.

5. Whenever these requests for production use the word "and" or the word "or," the Defendant shall understand the word conjunctively or disjunctively as necessary to make the request for production inclusive rather than exclusive.

TERMS AND MEANINGS

"**Document(s)**" is used in its broadest sense to include, by way of illustration only and not by way of limitation, any written, printed, typed or graphic matter of any kind or nature however produced or reproduced, including attorney billing records, invoices, reports, notes, transcripts, records, photographs, video tapes, or electronic data from which information can be obtained by the defendant.

"**United**" or "**United Corp**" shall mean the defendant United Corporation.

"Yusuf" or "You" shall mean defendant Fathi Yusuf.

REQUESTS

Please produce:

1. All documents substantiating the payment of \$99,254.45 written to Fuerst Ittleman David & Joseph, PL and signed by Fathi Yusuf on the United Corporation d/b/a Plaza Extra Banco Popular De Puerto Rico account on November 16, 2012, check number 4195, Bates No. HAMD203422-HAMD203423. Documents include, but are not limited to, invoices and attorney's billing records or time cards.
2. All documents substantiating the payment of \$111,660.24 written to Fuerst Ittleman David & Joseph, PL and signed by Fathi Yusuf on the United Corporation d/b/a Plaza Extra Banco Popular De Puerto Rico account on January 21, 2013, check number 4642, Bates No. HAMD203422-HAMD203423. Documents include, but are not limited to, invoices and attorney's billing records or time cards.
3. All documents substantiating the payment of \$112,383.32 written to Fuerst Ittleman David & Joseph, PL and signed by Fathi Yusuf on the United Corporation d/b/a Plaza Extra Banco Popular De Puerto Rico account on February 13, 2013, check number 4819, Bates No. HAMD277362-HAMD277363. Documents include, but are not limited to, invoices and attorney's billing records or time cards.
4. All documents substantiating the payment of \$82,274.87 written to Fuerst Ittleman David & Joseph, PL and signed by Fathi Yusuf on the United

Corporation d/b/a Plaza Extra Banco Popular De Puerto Rico account on March 6, 2013, check number 5005, Bates No. HAMD562193-HAMD562194.

Documents include, but are not limited to, invoices and attorney's billing records or time cards.

5. All documents substantiating the payment of \$54,938.89 written to Fuerst Ittleman David & Joseph, PL and signed by Fathi Yusuf on the United Corporation d/b/a Plaza Extra Banco Popular De Puerto Rico account on April 3, 2013, check number 5193, Bates No. HAMD562231-HAMD562232. Documents include, but are not limited to, invoices and attorney's billing records or time cards.

Dated: July 7, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of July 2014, I served a copy of the foregoing in compliance with the parties consent, pursuant to Fed. R. Civ. P. 5(b)(2)(E), to electronic service of all documents in this action on the following persons:

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