

**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  
SUPPLEMENTED RESPONSES TO DEFENDANTS'  
MAY 23<sup>rd</sup> REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Counterclaim Defendant Waheed Hamed hereby supplements his prior responses to the Rule 34 request served on him on May 23, 2014.

**PRELIMINARY STATEMENT**

On June 26, 2014, Waheed ("Willy") Hamed (referred to as "Counterclaim Defendant" herein) responded to Counterclaimants' May 23<sup>rd</sup> Rule 34 Request, answering for himself personally and not in any representative capacity, stating:

. . . object to the untimely service of the request -- which will not be answered until the motion presently before the Court on the issue has been decided.

The Court, while not expressly deciding the motion for a protective order, subsequently issued a superseding "Fifth Amended Scheduling Order" which Hamed believes requires the initial response to now be supplemented with answers. Indeed, the motion for a protective order was withdrawn after the new scheduling order was entered.

In the interim, counsel met with regard to Rule 37. A discussion has been ongoing about mutual, bilateral production. On September 26, 2014, Hamed's counsel wrote to opposing counsel:

We had discussed the understanding that Willie and Mr. Yusuf would produce the same materials – something you said you were going to confirm. Mr. Yusuf has not provided any such materials. I have (today) explained why he should – but continue with the willingness to honor our discussion and live with things the way they are or reciprocate with Willie's meager documents in return.

As no final resolution has been reached, out of an abundance of caution, Waheed Hamed is producing documents before the end of the period for fact discovery.

Additionally, these answers and objections are made solely for the purpose of this action. Each answer is subject to any and all objections as to competence, relevance, materiality, propriety, and admissibility; and any and all objections and grounds that would require the exclusion of any statement contained in any response, if such request were asked of, or any statement contained therein were made by, a witness present and testifying in court, all of which objections and grounds are hereby reserved and may be interposed at the time of trial.

Finally, the following answers are based upon information presently available to Waheed Hamed and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that he has answered or objected to any Request should not be taken as an admission that he accepts or admits the existence of

any facts set forth or assumed by such Request, or that such answer constitutes admissible evidence. The fact that he has answered part or all of any such Request is not intended and shall not be construed to be a waiver by Yusuf of all or any part of any objection to such Request.

### **GENERAL OBJECTIONS**

Waheed Hamed makes the following general objections to the Requests. Although these general objections apply to all of the Requests, for convenience, they are set forth herein and are not necessarily repeated after each objectionable request. The assertion of the same, similar or additional objections in the individual objections to these Request, or the failure to assert any additional objections to a request does not waive any of the objections as set forth below:

1. Waheed Hamed objects to each Request that seeks information that is not relevant to the claims asserted against him in this case.
2. Waheed Hamed objects to each Request to the extent it seeks the disclosure or production of documents or information protected by the attorney-client, work product or other privileges.
3. Waheed Hamed objects to each Request that seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.
4. The information sought by the Requests may be as much as twenty-seven (27) years old. Documents that may be contained information relevant to the Requests may no longer be in existence. Thus any information provided herein may not be, and should not be considered complete, and may be subject to supplementation if additional information becomes available.
5. Waheed Hamed objects to defined terms and instructions to the extent that they vary from applicable law and/or impose different objections than those set forth in the Federal Rules of Civil Procedure.

### **RESPONSES**

- 1. Please produce all financial records including statements of account for all checking, savings, credit, investment, trust, or escrow accounts, you*

*and Hamed have or had at any bank or financial institution anywhere in the world from 1986 through the present, including but not limited to:*

- a. Chase Account No. 721-04 7688*
- b. Scotia Bank Account No. 34622*
- c. Banco Popular 17886-5*
- d. Raymond James & Assoc. Account No. 6084*
- e. Raymond James & Assoc. Account No. 1124*
- f. Raymond James & Assoc. Account No. 0982*
- g. Raymond James & Assoc. Account No. 6098*
- h. Amex Gold Card (Waheed) 3782-925489-33001*
- i. Amex Gold Card (Firyal) 3782-925489-33001*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to those objections, there are no such joint accounts to my knowledge in the name of Waheed Hamed **AND** Mohammed Hamed as requested. This interpretation was discussed in the Rule 37 conference and Defendants did not thereafter amend or alter the question -- thus it is assumed the conjunction was intended.

*2. Please produce all financial records including statements of account for all checking, savings, credit, investment, trust, or escrow accounts in the name of any of your children, wife, parents, brothers, and any other third parties at any bank or financial institution anywhere in the world in which you or Hamed have or had any legal or equitable interest from January 1, 1986 to date.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. I also object to the request as stated, as it is confusing as worded. Subject to this objection, to the extent this request is understood, Subject to these objections, please see attached **Exhibit A – List of Responsive Documents**.

*3. Please produce all documents provided to your and Hamed's accountants from January 1, 1986 to date either for the preparation of tax returns, bookkeeping services, the preparation of financial statements, or loan applications.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. I also object to the request as stated, as it is confusing as worded. Subject to those objections, to the extent I understand this request, I have no such records for the tax years prior to 2002, although some of those records were seized by the FBI for some of the years prior to that, which records have been made available to you so that you have the same access to them as I do. I did provide the attached records

to the accountant who did my tax returns for the years 2002-2012. Please see attached **Exhibit A – List of Responsive Documents**.

*4. Please produce all Tax Returns filed on your behalf from 1986 to present.*

Supplemented Response: In addition to the “General Objections” raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have attached the ones in my possession. Please see attached **Exhibit A – List of Responsive Documents**.

*5. If you contend there were any errors made in any of your Tax Returns filed after 1986, please produce any and all documentation that demonstrates the errors in such returns and the actions you took to correct these errors.*

Supplemented Response: There are no such documents

*6. Please produce deed(s), contract(s), lease(s), or other similar documentary evidence of your ownership of any interest (including leasehold interests) in real property, from January 1, 1986 to present (regardless if you have transferred, sold, or otherwise disposed of these assets).*

Supplemented Response: In addition to the “General Objections” raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, please see attached **Exhibit A – List of Responsive Documents**.

*7. Please produce all statements from any brokerage or other accounts, including online based accounts, issued from January 1, 1986 to present pertaining to any stocks, bonds, stock options, debentures, mutual funds or other financial investments in which you or Hamed have or had any interest.*

Supplemented Response: In addition to the “General Objections” raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. I also object to the request as stated, as the term “financial investment” is vague and not capable of clear understanding as to what was intended to be covered. Subject to these objections, to the extent this request is understood, I have attached the documents that are in my possession. Please see attached **Exhibit A – List of Responsive Documents**. I know that some documents fitting the description of items covered by this request were seized by the FBI, which records have been made available to you so that you have the same access to them as I do.

*8. Please produce all documents relating to any cash withdrawn by the Partners from the Plaza Extra Stores from January 1, 1986 to date including all documents relating to what was done with such cash.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have attached those documents in my possession. Please see attached **Exhibit A – List of Responsive Documents**. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do, although the removal of cash by the partners prior to 2002 often did not involve the retention of such records, as Mike Yusuf testified in his deposition.

*9. Please produce all documents relating to any cash withdrawn by you or your brothers from the Plaza Extra Stores from January 1, 1986 to date including all documents relating to what was done with such cash.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have attached those documents in my possession. Please see attached **Exhibit A – List of Responsive Documents**. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do, although the removal of cash by the family members prior to 2002 often did not involve the retention of such records, as Mike Yusuf testified in his deposition.

*10. Please produce all documents relating to any checks or wire transfers from any Plaza Extra Accounts to the Partners or to third parties on their behalves from January 1, 1986 to date including all documents relating to what was done with such funds.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have attached those documents in my possession. Please see attached **Exhibit A – List of Responsive Documents**. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do.

*11. Please produce all documents relating to any checks or wire transfers from any Plaza Extra Accounts to you or your brothers or to third parties on you or your brothers behalves from January 1, 1986 to date including all documents relating to what was done with such funds.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have attached those documents in my possession. Please see attached **Exhibit A – List of Responsive Documents**. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do.

*12. Please produce all documents relating to any rent paid by or due from the Partnership for the Plaza Extra - East premises from January 1, 1986 to date including rent accounting records evidencing rent payments or rent due, claims or demands for rent, and rent payments.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have attached those documents in my possession. Please see attached **Exhibit A – List of Responsive Documents**. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. However, rent was generally paid in cash to Fathi Yusuf as the owner of United's Corporation so he could avoid paying taxes on it.

*13. Please produce all documents either supporting, undermining, or relating to any of the statements and information set forth in the letter from Yusuf to Hamed dated August 15, 2012 identified at FY004123- FY004210.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as too vague and confusing to comprehend what documents are being sought. To the extent this request is understood, those documents are attached. Please see attached **Exhibit A – List of Responsive Documents**.

*14. Please produce all documents relating to any documents removed from the Plaza Extra Stores prior to the FBI raid in 2001 including any documents pertaining to the destruction of receipts or other documents.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Subject to these objections and to the extent this request is understood, I have no such records in my possession. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. The only document I am aware of regarding the destruction of records is the corporate deposition of United

Corporation that is equally available to you where Mike Yusuf talks about destroying records.

*15. Please produce all documents relating to the "Black Book" and any pages missing from that document.*

Supplemented Response: The "Black Book" was apparently removed from the place it was being stored (along with other items returned by the FBI) by the Yusufs without my knowledge, who also apparently removed the pages, so other than what the Yusufs produced in discovery, no such documents exist under my control, nor have I been able to locate the missing pages.

*16. Please produce all documents the source of funds for the cash portion of the preliminary injunction bond posted in this case.*

Supplemented Response: Object to as seeking irrelevant information that is not likely to lead to discoverable information. Notwithstanding this objection, to the extent we could locate such documents, they will be supplied.

*17. Please produce all documents relating to the source of funds for the acquisition and operation of the businesses known as Five Corners and Five-H Holdings, Inc. including all documents pertaining to the organization, existence, and ownership of such businesses.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. It is also objected to as seeking information that is not relevant and not likely to lead to relevant evidence. Finally, it is objected to as seeking information related to another suit, which is an improper use of discovery. This request is also objected to as too vague and confusing to comprehend what documents are being sought as far as the "acquisition" of the corporation is concerned. Notwithstanding these objections, to the extent this request is understood and without waiving any objections raised, the documents are attached. Please see attached **Exhibit A – List of Responsive Documents**.

*18. Please produce any financial statements prepared by or for you from January 1, 1986 to date.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to these objections, we are trying to locate any such documents and if located, they will be supplied.

*19. Please produce all documents relating to the acquisition, improvement, cost of construction, and market value of all real estate in which you have or had an ownership interest from January 1, 1986 to date including all*



*documents pertaining to the source of funds for acquisition and improvement.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Subject to these objections, the documents I have that are responsive to this request are attached. Please see attached **Exhibit A – List of Responsive Documents**.

*20. Please produce all documents generated in or relating to the Criminal Case that pertain to your, Hamed's or your brothers' receipt of money in the form of cash, checks or wire transfers from the Plaza Extra Stores or the Plaza Extra Accounts from January 1, 1986 to date.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, I have no such records in my possession. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do.

*21. Please produce all documents relating to how proceeds or profits from the Plaza Extra Stores were distributed to you, Hamed and your family members from January 1, 1986 to date.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, please refer to the responses to RFPDs numbers eight and nine. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do. Other documents may also be in the possession of the joint criminal counsel attorneys which are also equally available to you.

*22. Please produce all documents relating to the removal, transfer, subsequent transfer and use of funds from any of the Plaza Extra Accounts by you, Hamed, and your family members, other than salaries or direct reimbursements of costs.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, please refer to the responses to RFPDs numbers eight and nine. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do. Other documents may

also be in the possession of the joint criminal counsel attorneys which are also equally available to you.

*23. Please produce all documents relating to any claims or counterclaims you may have against Yusuf and United for any type of relief including, but not limited to, money damages.*

Supplemental Response: I have not filed a counterclaim in this case. Regarding other claims, I have a suit pending against the Defendants filed by Lee Rohn. To the extent this request seeks those documents, I object to the Defendants using this case to get materials related to that case, as it would be an ex parte communication to seek such materials without going through Attorney Rohn.

*24. Please produce all documents relating to all defenses or offsets you have or may have with regard to the claims of Yusuf and United.*

Supplemented Response: This request is objected to as too vague and confusing to comprehend what documents are being sought, as the term "defenses" is a legal term for my counsel to address, which is why I have counsel since I am not a trained lawyer. Finally, this request is objected to as seeking information protected by the work product rule. Notwithstanding this objection, to the extent this request is understood and without waiving any objections raised, I am not asserting any offsets in this case. Regarding other claims, I have a suit pending against the Defendants filed by Lee Rohn. To the extent this request seeks those documents, I object to the Defendants using this case to get materials related to that case, as it would be an ex parte communication to seek such materials without going through Attorney Rohn.

*25. Please produce all documents relating to all amounts which you, Hamed and your family members have taken from the Plaza Extra Stores or Plaza Extra Accounts beyond salaries from January 1, 1986 to date.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Subject to these objections and to the extent this request is understood, please refer to the responses to RFPDs numbers eight and nine. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. Another document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.

*26. Please produce all documents relating to all funds removed by you, Hamed, or your family from the Plaza Extra Stores or Plaza Extra Accounts that were used to buy real estate or other assets, and list all assets*

*purchased, form of ownership, the date of purchase and the percentile owners at that time and now.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Finally, the request to "list all assets purchased, form of ownership, the date of purchase and the percentile owners at that time and now" is an interrogatory, not a request for the production of documents. Subject to these objections and to the extent this request is understood, I have no such records in my possession, although there are deeds recorded in the Virgin Islands and Jordan for property jointly owned by the Hameds and the Yusufs, which documents containing the information sought are equally available to you. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. The only document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.

*27. Please produce all documents relating to all investigations, reports, studies, surveys, valuations or expert advise [sic] obtained by you, Hamed, and your family with regard to the Plaza Extra Stores from January 1, 2011 to date.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

*28. Please produce all documents relating to all witnesses you, Hamed, or your family have interviewed and may or will call at trial in this matter. Provide all witness statements, notes and information provided by them to you.*

In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such

disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

*29. Please produce all accountings, valuations or other information pertaining to the valuation or division of the Plaza Extra Stores.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

*30. Please produce all records kept by you, Hamed, and your family for keeping track of withdrawals and amounts due to the Hameds or Yusufs from January 1, 1986 through December 31, 2003.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Subject to these objections and to the extent this request is understood, please refer to the responses to RFPDs numbers eight and nine. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. The only document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.

*31. Please produce the financial documents for all accounts and transactions on those accounts for Sixteen Plus and Plessen Enterprises, Inc.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. The attorney for the corporations (Beckstedt), and Fathi Yusuf have most of these documents as well as the accounting employees at the Plaza stores, which information is equally available to you. The entire body of documents seized by the U.S. Government may contain some of these requested documents, which Fathi Yusuf has the access to as do I.

*32. Please produce all documents supporting any claims of Hamed against United.*

Supplemented Response: I have not filed a counterclaim in this case. Regarding other claims, I have a suit pending against the Defendants filed by Lee Rohn. To the extent this request seeks those documents, I object to the Defendants using this case to get materials related to that case, as it would be an ex parte communication to seek such materials without going through Attorney Rohn.

*33. Please produce all documents supporting any claims of Hamed against Yusuf.*

Supplemented Response: I have not filed a counterclaim in this case. Regarding other claims, I have a suit pending against the Defendants filed by Lee Rohn. To the extent this request seeks those documents, I object to the Defendants using this case to get materials related to that case, as it would be an ex parte communication to seek such materials without going through Attorney Rohn.

*34. Please produce all documents relating to any defense you intend to assert with respect to the claims made against you in this case.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

*35. Please produce all documents relating to each exhibit you intend to introduce into evidence at the trial of this case.*

Supplemented Response: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

**Dated:** September 29, 2014

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**Carl J. Hartmann III, Esq.**

for Waheed Hamed

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Christiansted, VI 00820

Telephone: (340) 719-8941

Email: carl@carlhartmann.com

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of September, 2014, I served a disk containing the documents by USPS Priority mail and I served a copy of the foregoing Responses by email as agreed by the parties, on:

**Joel H. Holt, Esq.**

for Mohammad Hamed

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**Waheed Hamed**  
**Exhibit A - List of Responsive Documents Produced**  
**September 29, 2014**

<b>Bate Range</b>	<b>RFPD No.</b>
HAMD611791-HAMD611791	3
HAMD611803-HAMD611803	3
HAMD611805-HAMD611805	3
HAMD611824-HAMD611824	3
HAMD611818-HAMD611818	3
HAMD611795-HAMD611795	3
HAMD611817-HAMD611817	3
HAMD611811-HAMD611811	3
HAMD611797-HAMD611797	3
HAMD611809-HAMD611809	3
HAMD611812-HAMD611812	3
HAMD611796-HAMD611796	3
HAMD611807-HAMD611807	3
HAMD611804-HAMD611804	3
HAMD611814-HAMD611814	3
HAMD611808-HAMD611808	3
HAMD611823-HAMD611823	3
HAMD611822-HAMD611822	3
HAMD611800-HAMD611800	3
HAMD611798-HAMD611798	3
HAMD611813-HAMD611813	3
HAMD611792-HAMD611792	3
HAMD611801-HAMD611801	3
HAMD611799-HAMD611799	3
HAMD611794-HAMD611794	3
HAMD611821-HAMD611821	3
HAMD611816-HAMD611816	3
HAMD612371-HAMD612380	3
HAMD611826-HAMD611826	03, 04
HAMD611827-HAMD611827	03, 06, 07
HAMD611820-HAMD611820	03, 06, 19
HAMD611810-HAMD611810	03, 07
HAMD611790-HAMD611790	03, 07
HAMD611819-HAMD611819	03, 07
HAMD611802-HAMD611802	03, 07
HAMD611793-HAMD611793	03, 07
HAMD611806-HAMD611806	03, 07
HAMD611825-HAMD611825	03, 07
HAMD611788-HAMD611788	03, 07
HAMD611789-HAMD611789	03, 07
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HAMD611002-HAMD611004	2
HAMD610836-HAMD610837	2
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HAMD563347-HAMD563350	4
HAMD563351-HAMD563356	4
HAMD562231-HAMD562232	08, 09
HAMD203764-HAMD203767	08, 09
HAMD562193-HAMD562194	08, 09
HAMD203422-HAMD203423	08, 09
HAMD277362-HAMD277363	08, 09
HAMD261896-HAMD261897	08, 09
HAMD255290-HAMD255291	08, 09, 13
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HAMD593190-HAMD593191	08, 09, 13
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HAMD591981-HAMD591981	08, 13
HAMD212728-HAMD212728	09, 13
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HAMD227956-HAMD227956	09, 13
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HAMD227958-HAMD227958	09, 13
HAMD227950-HAMD227951	09, 13
HAMD595885-HAMD595885	09, 13
HAMD211372-HAMD211372	09, 13
HAMD212003-HAMD212003	09, 13
HAMD212007-HAMD212007	09, 13
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HAMD591982-HAMD591982	09, 13
HAMD227949-HAMD227949	09, 13
HAMD213140-HAMD213140	09, 13
HAMD212906-HAMD212906	09, 13
HAMD227922-HAMD227922	09, 13
HAMD227917-HAMD227917	09, 13
HAMD211371-HAMD211371	09, 13
HAMD227919-HAMD227919	09, 13
HAMD227970-HAMD227970	09, 13
HAMD213152-HAMD213152	09, 13
HAMD227930-HAMD227930	09, 13
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HAMD213139-HAMD213139	09, 13
HAMD211941-HAMD211941	09, 13
HAMD227929-HAMD227929	09, 13
HAMD211405-HAMD211406	09, 13
HAMD595891-HAMD595891	09, 13
HAMD212726-HAMD212726	09, 13
HAMD212704-HAMD212704	09, 13
HAMD212712-HAMD212712	09, 13
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HAMD212656-HAMD212656	09, 13
HAMD212709-HAMD212709	09, 13
HAMD228006-HAMD228006	09, 13
HAMD213127-HAMD213127	09, 13
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HAMD202985-HAMD202985	12
HAMD200817-HAMD200817	12
HAMD562327-HAMD562327	12
HAMD589085-HAMD589085	12
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HAMD595493-HAMD595493	12
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HAMD597309-HAMD597309	12
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HAMD592602- HAMD592632	Yusuf Chit	Not Applicable	Joel Holt, Carl Hartmann	Mufeed Hamed	N/A	N/A	Atty-Client and Atty Work Product	Notes from attorney/client conversation about Yusuf 2001 chits and attorney summary
HAMD592045- HAMD592071	Yusuf Chit	Not Applicable	Joel Holt, Carl Hartmann	Mufeed Hamed	N/A	N/A	Atty-Client and Atty Work Product	Notes from attorney/client conversation about Yusuf 2001 chits
HAMD592647- HAMD592647	Notes	Not Applicable	Joel Holt	Waleed Hamed	N/A	N/A	Atty-Client	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD592647R- HAMD592647R
HAMD592505- HAMD592601	Hamed Chit	Not Applicable	Joel Holt, Carl Hartmann	Mufeed Hamed	N/A	N/A	Atty-Client and Atty Work Product	Summary of Hamed chits, with notes between attorney and client affixed to each page. See Defendants' Bates #: 0112036-0112123 for original document.

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HAMD592082- HAMD592168	Hamed Chit	Not Applicable	Joel Holt, Carl Hartmann	Mufeed Hamed	N/A	N/A	Atty-Client and Atty Work Product	Summary of Hamed chits, with notes between attorney and client affixed to each page. See Defendants' Bates #: 0112036-0112123 for original document.
HAMD261905- HAMD261924	Check	??/??/2001	Joel Holt	Waleed Hamed	N/A	N/A	Atty-Client	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD261905R- HAMD261924R
HAMD261925- HAMD261938	Check	??/??/2002	Joel Holt	Waleed Hamed	N/A	N/A	Atty-Client	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD261925R- HAMD261938R
HAMD592667- HAMD592668	Check	Sun 09/15/2002	Joel Holt	Waleed Hamed	N/A	N/A	Atty-Client	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD592667- HAMD592668



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HAMD592454- HAMD592454	Letter	Thu 11/14/2013	Hamm	Joel Holt	N/A	N/A	Atty Work Product	Letter regarding documents provided to Attorney Donovan Hamm
HAMD593192- HAMD593192	Letter	Mon 12/09/2013	Donovan Hamm	Joel Holt	N/A	N/A	Atty Work Product	Letter regarding expert report
HAMD595107- HAMD595109	Email	Fri 12/20/2013	Joel Holt, Waleed Hamed, Waheed Hamed, Mufeed Hamed, Carl Hartmann, Kim Japinga	Hisham Hamed	N/A	N/A	Atty-Client	Email regarding payroll
HAMD597476- HAMD597476	Email	Fri 03/07/2014	Carl Hartmann	Hisham Hamed	N/A	N/A	Atty-Client	Email regarding taxes