

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

UNITED CORPORATION,

Plaintiff,

v.

**WAHEED HAMED,
(a/k/a Willy or Willie Hamed),**

Defendant.

Case No.:2013-CV-101

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

DEFENDANT'S RESPONSES TO INTERROGATORIES

1. Please identify your professional or occupational relationship with Plaintiff United Corporation. Include in your response the length of time you have been associated with United Corporation in what capacities, and what your present duties and responsibilities include.

None. Plaintiff is an employee of Plaza Extra Supermarkets. United is a corporation which is majority owned by Fathi Yusuf -- who is a partner in Plaza Extra Supermarkets. I am a manager of the Plaza Extra Supermarket on St. Thomas.

2. Please state the name, address, and phone number of every person who has prepared your Tax Returns from 1986 through 2009.

Object for years after 1992. Subject to that objection, I do not recall for all years. I know that my tax returns for some periods were prepared by Pablo Oneal.

3. Please provide the source of income, including any and all financial accounts, loans, gifts, etc., you used to acquire or open 5 Corners Mini Mart as fully described in your 1992 Tax Return. This includes the funds you used to acquire inventory/cost of goods sold that was used in the business.

None.

4. Identify every financial account, including but not limited to savings, checking, brokerage, certificates of deposits, stocks, bonds, trust funds, used to acquire any

real estate in your name, and/or the name of any of your children, wife, parents, and any other third parties whom you have used to acquire assets on your behalf.

Object as to years after 1992. Object as to relevance. Subject to that objection, I do not recall. The only real property I own directly is 4-15-4 Estate Harmony.

5. Identify every gambling account you have ever opened at any gambling institution, including but not limited to Casinos, Hotels, Online Gambling sites, and/or foreign gambling operations, including a detailed list of any gambling losses you sustained for the period of 1986 through present, including the name of the gambling institution.

Object as to years after 1992. Object as to relevance. Subject to that objection, I do not recall.

6. Provide a detailed list of all loans (personal or business) you (or any of your agents or designees) made to anyone for the period of 1990 through 2009, including the source of these funds.

Object as to years after 1992. Object as to relevance. Subject to that objection, I do not recall.

7. If you contend that there were any distributions of net income or profits from the operations of the Plaza Extra supermarket as a source of revenues for the acquisition of inventory in your business (5 Corner Mini Mart as described in your 1992 tax return), state in detail when and how these profits or funds were distributed. Specify how you obtained these distributions of net income/profits and from whom.

Object as to relevance. Subject to that objection, I did not.

8. Please state if you ever had **any** contact with the Universal Academy of Florida in Orlando, Florida. If so, describe the nature of your contacts or relationship with Universal Academy of Florida.

I don't ever recall making any contact with them.

9. Describe the time period when you acquired and renovated your personal

residence, including the amount paid to acquire said residence, and the total cost of all renovations.

It was built in 2000. There were no significant renovations. How much I paid is all in the CD's of papers from the U.S. Government that both parties have copies of.

10. Provide a list of every account, including opening and closing dates of each account, you ever opened anywhere at any financial institution, including but not limited to the United States, Caribbean, Europe, the Caribbean, and the Middle East.

Object as to years after 1992. Object as to relevance. Subject to that objection, I do not recall.

11. Detail, by date, source, and location, all wire transfers made by you or on behalf of your father Mohammed Hamed from any account in the United States to any Bank, financial institution, and/or trust in the Middle East, including but not limited to the country of Jordan and The West Bank, Palestine.

Object as to years after 1992. Object as to relevance. Subject to that objection, I do not recall.

12. Please state the name of the "partnership" you claim to be an "employee" of in ¶21 of your Amended Answer. Provide any evidence (documentary or otherwise) demonstrating the existence of that "partnership" and your tenure with that entity.

Plaza Extra Supermarkets. The extensive deposition of Fathi Yusuf in the St. Thomas case.

13. Describe the factual and/or legal basis for your contention for each of the Affirmative Defenses stated in your Answer.

Object. Overly broad.

RESPECTFULLY SUBMITTED,

Dated: February 12, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of February, 2014, I served a copy of the foregoing Memorandum by email, as agreed by the parties, on:

Nizar A. DeWood
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