MOHAMMAD HAMED, by his authorized agent WALEED HAMED,	
Plaintiff/Counterclaim Defendant, )	
vs.	CIVIL NO. SX-12-CV-370
FATHI YUSUF and ) UNITED CORPORATION, )	ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF
Defendants/Counterclaimants, )	
vs. )	JURY TRIAL DEMANDED
WALEED HAMED, WAHEED  HAMED, MUFEED HAMED,  HISHAM HAMED,  and PLESSEN ENTERPRISES, INC.,	
Counterclaim Defendants. )	

# NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

## TO:

# THE HONORABLE TAMARA BERMUDEZ

Chief Deputy Clerk
R. H. Amphlett Leader
Justice Complex
RR1 9000
1st Floor, Room 101
Kingshill, VI 00850

# **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405

Email: ghodges@dtflaw.com

Notice of Intent to Serve Subpoena Page 2

**NIZAR A. DEWOOD** 

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444

Email: dewoodlaw@gmail.com

MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

PLEASE TAKE NOTICE that on March 11, 2014, or as soon thereafter as service may be effectuated, and pursuant to Federal Rule of Civil Procedure 45 as adopted by this Court, the undersigned will issue and serve the Subpoena Duces Tecum attached hereto as "Exhibit A", upon Merrill Lynch, a non-party to the above-captioned litigation, for a deposition and the production of the items listed in said Subpoena at the time and place specified therein.

Dated: March 11, 2014

Joel H. Holt, Esq. Counsel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street, Christiansted, St. Croix U.S. Virgin Islands 00820 (340) 773-8709 holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of March, 2014, I served a copy of the foregoing Notice by email, as agreed by the parties, on:

# **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com

#### **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

## MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

<b>MOHAMMAD HAMED</b> , by his authorized agent WALEED HAMED,	)
Plaintiff/Counterclaim Defendant,	)
VS.	CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,	) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF
Defendants/Counterclaimants,	) DEGLARATORY RELIEF
vs.	) JURY TRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	) ) ) )
Counterclaim Defendants.	) ) )

# SUBPOENA DUCES TECUM

TO: Merrill Lynch Pierce Fenner & Smith, Inc.

5143 Palm Passage

Suite 3

St. Thomas, VI 00802-6413

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure, you are hereby commanded to appear at the Law Office of Joel H. Holt, located at 2132 Company Street, Christiansted, VI 00820 on Tuesday, March 25, 2014 at 3:00 p.m. for the taking of a deposition and to have with you at that time and place any and all the documents pertinent to the items identified below:



Any and all (preferably electronic) documents and records from January 1, 2002 to the present for account numbers 140-07759, 140-21722 and any additional accounts in the name of United Corporation, Plaza Extra, or United Corporation d/b/a Plaza Extra bank. Records shall include, but not be limited to, account statements, cancelled checks, deposit slips, and transactional records.

**Dated:** March 11, 2014

Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709
holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

# **CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of March, 2014, I served a copy of the foregoing Subpoena Duces Tecum by email, as agreed by the parties, on:

#### **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com

#### **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444

Email: dewoodlaw@gmail.com

Page 3 Subpoena Duces Tecum

MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

Mr.

MOHAMMAD HAMED, by his authorized agent WALEED HAMED,	) )
Plaintiff/Counterclaim Defendant,	) )
VS.	) CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,	) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF
Defendants/Counterclaimants,	) )
VS.	) JURY TRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	/ ) ) )
Counterclaim Defendants.	<i>)</i> )
	)

# NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

## TO:

# THE HONORABLE TAMARA BERMUDEZ

Chief Deputy Clerk
R. H. Amphlett Leader
Justice Complex
RR1 9000
1st Floor, Room 101
Kingshill, VI 00850

# **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405

Email: ghodges@dtflaw.com

Notice of Intent to Serve Subpoena Page 2

**NIZAR A. DEWOOD** 

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

PLEASE TAKE NOTICE that on March 11, 2014, or as soon thereafter as service may be effectuated, and pursuant to Federal Rule of Civil Procedure 45 as adopted by this Court, the undersigned will issue and serve the Subpoena Duces Tecum attached hereto as "Exhibit A", upon Scotiabank, a non-party to the above-captioned litigation, for a deposition and the production of the items listed in said Subpoena at the time and place specified therein.

Dated: March 11, 2014

Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709
holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of March, 2014, I served a copy of the foregoing Notice by email, as agreed by the parties, on:

## **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com

#### **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

## MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

<b>MOHAMMAD HAMED</b> , by his authorized agent WALEED HAMED,	) )
Plaintiff/Counterclaim Defendant,	)
VS.	) CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,	) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF
Defendants/Counterclaimants,	) )
VS.	) JURY TRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	) ) ) )
Counterclaim Defendants.	) )

# SUBPOENA DUCES TECUM

TO: Scotiabank
P.O. Box 773
King Street
Christiansted, U.S. Virgin Islands 00821-0773

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure as adopted by the VI Superior Court, you are hereby commanded to appear at the Law Office of Joel H. Holt, located at 2132 Company Street, Christiansted, VI 00820 on Tuesday, March 25, 2014 at 9:30 a.m. for the taking of a deposition and to have with you at that time and place any and all the documents pertinent to the items identified below:

Any and all (preferably electronic) documents and records from January 1, 2002 to the present for account numbers 580092918, 4496010640, 4455312010, 4455356719, 058-60086413, 60092918, 60086413, 55356719, 55312010, 65811 and any additional accounts in the name of United Corporation, Plaza Extra, or United Corporation d/b/a Plaza Extra bank. Records shall include, but not be limited to, bank statements, cancelled checks, deposit slips, and transactional records.

Dated: March 11, 2014

Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709
holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of March, 2014, I served a copy of the foregoing Subpoena Duces Tecum by email, as agreed by the parties, on:

## **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405

Email: <a href="mailto:ghodges@dtflaw.com">ghodges@dtflaw.com</a>

Page 3 Subpoena Duces Tecum

# **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

# MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

M

MOHAMMAD HAMED, by his authorized agent WALEED HAMED,	)
Plaintiff/Counterclaim Defendant,	)
VS.	) CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,	) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF
Defendants/Counterclaimants,	
VS.	) JURYTRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	) ) ) )
Counterclaim Defendants.	, ) )

# NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

## TO:

# THE HONORABLE TAMARA BERMUDEZ

Chief Deputy Clerk
R. H. Amphlett Leader
Justice Complex
RR1 9000
1st Floor, Room 101
Kingshill, VI 00850

# **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com Notice of Intent to Serve Subpoena Page 2

**NIZAR A. DEWOOD** 

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

PLEASE TAKE NOTICE that on March 11, 2014, or as soon thereafter as service may be effectuated, and pursuant to Federal Rule of Civil Procedure 45 as adopted by this Court, the undersigned will issue and serve the Subpoena Duces Tecum attached hereto as "Exhibit A", upon Banco Popular, a non-party to the above-captioned litigation, for a deposition and the production of the items listed in said Subpoena at the time and place specified therein.

Dated: March 11, 2014

Joel H. Holt, Esq. Counsel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street, Christiansted, St. Croix U.S. Virgin Islands 00820 (340) 773-8709 holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of March, 2014, I served a copy of the foregoing Notice by email, as agreed by the parties, on:

## **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com

#### **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

## MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

MAM

<b>MOHAMMAD HAMED</b> , by his authorized agent WALEED HAMED,	) )
Plaintiff/Counterclaim Defendant,	)
VS.	) CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,	) ) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF
Defendants/Counterclaimants,	) BEOLANATONT NEELE
VS.	) ) JURY TRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED,	) ) )
and PLESSEN ENTERPRISES, INC.,  Counterclaim Defendants.	) ) )

# SUBPOENA DUCES TECUM

TO: Banco Popular

c/o Sunny Isles Branch 4500 Sion Farm Christiansted, VI 00830

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure, you are hereby commanded to appear at the Law Office of Joel H. Holt, located at 2132 Company Street, Christiansted, VI 00820 on Tuesday, March 25, 2014 at 1:00 p.m. for the taking of a deposition and to have with you at that time and place any and all the documents pertinent to the items identified below:

**EXHIBIT** 

Any and all (preferably electronic) documents and records from January 1, 2002 to the present for account numbers 191-256269, 191-063789, 191-148830, 191-013307, 192-026143, PSF-001422, PSF-002763, PSP-055360, PSP-055379, PSV-004901, PSV-004910, PSV-004928, PSV-004936 and any additional accounts in the name of United Corporation, Plaza Extra, or United Corporation d/b/a Plaza Extra bank. Records shall include, but not be limited to, bank statements, cancelled checks, deposit slips, and transactional records.

**Dated:** March 11, 2014

Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709
holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

# **CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of March, 2014, I served a copy of the foregoing Subpoena Duces Tecum by email, as agreed by the parties, on:

#### **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com Page 3 Subpoena Duces Tecum

# **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

# MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

f Mu

<b>MOHAMMAD HAMED</b> , by his authorized agent WALEED HAMED,	)
Plaintiff/Counterclaim Defendant,	)
VS.	) CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,  Defendants/Counterclaimants,	) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF )
vs.	) JURY TRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	) ) ) )
Counterclaim Defendants.	)

## NOTICE OF INTENT TO SERVE SUBPOENA DUCES TECUM

## TO:

# THE HONORABLE TAMARA BERMUDEZ

Chief Deputy Clerk R. H. Amphlett Leader Justice Complex RR1 9000 1st Floor, Room 101 Kingshill, VI 00850

## **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405

Email: ghodges@dtflaw.com

Notice of Intent to Serve Subpoena Page 2

**NIZAR A. DEWOOD** 

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773–3444

Èmail: dewoodlaw@gmail.com

MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

PLEASE TAKE NOTICE that on March 11, 2014, or as soon thereafter as service may be effectuated, and pursuant to Federal Rule of Civil Procedure 45 as adopted by this Court, the undersigned will issue and serve the Subpoena Duces Tecum attached hereto as "Exhibit A", upon Popular Securities, a non-party to the above-captioned litigation, for a deposition and the production of the items listed in said Subpoena at the time and place specified therein.

Dated: March 11, 2014

Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709
holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 11th day of March, 2014, I served a copy of the foregoing Notice by email, as agreed by the parties, on:

## **GREGORY H. HODGES**

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405 Email: ghodges@dtflaw.com

#### **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

## MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

1

MOHAMMAD HAMED, by his authorized agent WALEED HAMED,	)
Plaintiff/Counterclaim Defendant,	)
vs.	CIVIL NO. SX-12-CV-370
FATHI YUSUF and UNITED CORPORATION,	) ) ACTION FOR DAMAGES, ) INJUNCTIVE RELIEF AND ) DECLARATORY RELIEF
Defendants/Counterclaimants,	)
VS.	) JURY TRIAL DEMANDED
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	) ) ) )
Counterclaim Defendants.	) )

# SUBPOENA DUCES TECUM

TO: Popular Securities c/o Sunny Isles Branch 4500 Sion Farm Christiansted, VI 00830

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure as adopted by the VI Superior Court, you are hereby commanded to appear at the Law Office of Joel H. Holt, located at 2132 Company Street, Christiansted, VI 00820 on Tuesday, March 25, 2014 at 1:00 p.m. for the taking of a deposition and to have with you at that time and place any and all the documents pertinent to the items identified below:

Any and all (preferably electronic) documents and records from January 1, 2002 to the present for account numbers 191-256269, 191-063789, 191-148830, 191-013307, 192-026143, PSF-001422, PSF-002763, PSP-055360, PSP-055379, PSV-004901, PSV-004910, PSV-004928, PSV-004936 and any additional accounts in the name of United Corporation, Plaza Extra, or United Corporation d/b/a Plaza Extra bank. Records shall include, but not be limited to, bank statements, cancelled checks, deposit slips, and transactional records.

**Dated:** March 11, 2014

Joel N. Holt, Esq. Counsel for Plaintiff Law Offices of Joel H. Holt 2132 Company Street, Christiansted, St. Croix U.S. Virgin Islands 00820 (340) 773-8709 holtvi@aol.com

Carl J. Hartmann III, Esq. 5000 Estate Coakley Bay, L-6 Christiansted, VI 00820 (340) 719-8941 carl@carlhartmann.com

#### CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2014, I served a copy of the foregoing Subpoena Duces Tecum by email, as agreed by the parties, on:

#### GREGORY H. HODGES

Dudley, Topper and Feuerzeig, LLP Law House, 10000 Frederiksberg Gade P.O. Box 756 St. Thomas, VI 00802 (340) 715-4405

Email: ghodges@dtflaw.com

# **NIZAR A. DEWOOD**

The Dewood Law Firm 2006 Eastern Suburb, Suite 101 Christiansted, VI 00820 (340) 773-3444 Email: dewoodlaw@gmail.com

# MARK W. ECKARD

Eckard, P.C. 1 Company St. P.O. Box 24849 Christiansted, VI 00824 (340) 514-2690 mark@markeckard.com

Ah