

YUSUF YUSUF, derivatively on behalf of PLESSEN ENTERPRISES, INC. vs.
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED,
and FIVE-H HOLDINGS, INC.

Case No.: SX-13-CV-120

Plaintiff's Rule 26(a)(1) Initial Disclosures

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3. Maher Yusuf, Current Director and Shareholder of Plessen
4. Mohammed/Mohamad Hamed, Current Director, President and Shareholder of Plessen
5. Yusuf Yusuf, Plaintiff and Shareholder of Plessen
6. Fawzia Yusuf, Shareholder of Plessen
7. Nejeh Yusuf, Shareholder of Plessen
8. Mufeed Hamed, Shareholder of Plessen and an Owner/Officer of Five-H
9. Waheed Hamed, Shareholder of Plessen and an Owner/Officer of Five-H
10. Hisham Hamed, Shareholder of Plessen and an Owner/Officer of Five-H
11. Mike Yusuf
Plaza Extra
14 Estate Plessen
St. Croix, USVI 00840
340-719-1870
340-719-1874

Any witness identified by Plaintiff in his Rule 26 disclosures or responses to written discovery.

DISCLOSURE No. 2:

A copy of, or a description by category and location, of all documents, electronically stored information, and tangible things that the Plaintiff has in her possession, custody, or control and may use to support her claims or defenses, unless the use would be solely for impeachment:

1. Copy of cancelled Check No. 0376 dated March 27, 2013 made payable to Waleed Hamed on the account of Plessen in the amount of Four Hundred Sixty Thousand and 00/100 US Dollars as processed by Scotiabank on March 27, 2013 attached hereto as Exhibit "A".
2. Copy of Plessen's Scotiabank Business Checking Account Summary for Account No. 058-00045012 showing transactions from March 8, 2013 – March 29, 2013 attached hereto as Exhibit "B".

DISCLOSURE No. 3:

A computation of each category of damages claimed by the Plaintiff, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

Loss of funds in the amount of \$460,000 plus additional actual, compensatory and punitive damages. Investigation continues.

DISCLOSURE No. 4:


For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy judgment:

None known at this time.

Plaintiff reserves the right to supplement these disclosures according to Rule 26(e) of the Federal Rules of Civil Procedure if additional information is obtained after the date of these disclosures.

**LAW OFFICES OF
ANDREW L. CAPDEVILLE, P.C.**

DATED: March 21, 2014

By: 
ANDREW L. CAPDEVILLE, ESQ.
V.I. Bar No. 206
Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of March, 2014, I caused the original of Plaintiff's Rule 26(a)(1)(A) Disclosures to be served via first class mail, postage prepaid upon:

Mark W. Eckard, Esq.
P.O. Box 24849
Christiansted, VI 00824
Counsel for the Defendants

Nizar A. DeWood, Esq.
The DeWood Law Firm
2006 Eastern Suburb, Suite 101
Christiansted, VI 00820
Co-counsel for Plaintiff



Document Type	Cheque Image	Date Processed:	11/27/2012
Tranact Number:	00000	Cheque Serial Number:	0376
Account Number:	00000	Amount:	430,000.00

0376

PLESSEN ENTERPRISES, INC.

Waleed Hamed

four hundred sixty thousand

Scotiabank

045

3/27/13

430,000.00

045

0376

00000

CR Print

ALL-STATE LEGAL®
Exhibit A

HAMD629449



UK Price

11860954 850
1600 8000 1000
1000 1000 1000

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

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Date Purchased:	Charge Serial Number:	Amount:	Account Number:
11/11/11	11860954	850	1600 8000 1000

HAMD629450



Your BUSINESS CHECKING Account Summary

PLESSEN ENTERPRISES, INC.
008-0045012

1-877-9SCOTIA
1-866-973-6842

www.usvt.scotiabank.com

Transactions (Withdrawals & Deposits) - 058-00045012			
Transaction Date	Description	Amount	Balance
	OPENING BALANCE		\$ 530,576.86
12 MAR	DEPOSIT - 874437	\$ 38,900.00 +	\$ 569,476.86
12 MAR	CHECK - 370	\$ 32,803.86 -	\$ 436,672.99
13 MAR	CHECK - 371	\$ 6,175.31 -	\$ 430,497.68
13 MAR	CHECK - 376	\$ 40,000.00 -	\$ 390,497.68
13 MAR	SERVICE CHARGE	\$ 5.57 -	\$ 389,942.11
	CLOSING BALANCE		\$ 7,588.99
Total Returned Item Fees This Period		\$ 0.00	Total Overdraft Fees This Period \$ 0.00
Total Returned Item Fees Year to Date		\$ 0.00	Total Overdraft Fees Year to Date \$ 0.00

ALL-STATE LEGAL®
Exhibit B

HAMD629451