

# JOEL H. HOLT, ESQ. P.C.

---

2132 Company Street, Suite 2  
Christiansted, St. Croix  
U.S. Virgin Islands 00820

Tele. (340) 773-8709  
Fax (340) 773-8677  
E-mail: [holtvi@aol.com](mailto:holtvi@aol.com)

April 4, 2014

Nizar A. DeWood  
The DeWood Law Firm  
2006 Eastern Suburb, Suite 101  
Christiansted, VI 00820

Gregory H. Hodges  
VI Bar No. 174  
Law House, 10000 Frederiksberg Gade  
P.O. Box 756  
ST. Thomas, VI 00802

By Email and Mail

**Re: *Hamed v. Yusuf and United Corporation***

Dear Counsel:

I have reviewed United's March 28<sup>th</sup> discovery responses (as amended) and find the following deficiencies that I would request be corrected immediately, particularly since we granted an extension of time to respond to these requests. If you disagree with my client's position regarding any of these items, please consider this a request for a Rule 37 meet and confer to discuss these responses to see if we can amicably resolve these matters.

**Rule 33 Interrogatories:**

**Interrogatory #5**-This response is improper as your client needs to answer this information to the best of its knowledge, as it is immaterial what the Plaintiff may or may not know. Indeed, the Plaintiff is entitled to seek confirmation of information even if he has it.

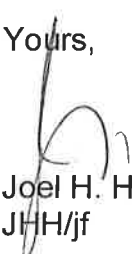
**Interrogatory #6**-This interrogatory seeks information not contained in the referenced motion-please provide this information.

**Rule 34 Document Request:**

**Request # 9, 10, 11, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 26, 27, 29, 30, 31, 33, 34, 35, 36, 37 and 38**-In each of these requests your client states that **"to the extent that any documents responsive to this request have not already been produced** same will be produced." (Emphasis added). However, Rule 34 requires that the specific documents responsive to each request be specifically identified as to each request. My client is not required to "guess" as to which documents in the voluminous documents previously dumped on us are responsive to each specific request identified above. Please provide us with a list of the bates stamped numbers for the specific documents responsive to each request.

Please let me know if this information will be voluntarily supplemented and, if not, what dates we can do a Rule 37 meet and confer on any items you will not voluntarily agree to supplement. In the meantime, we are reviewing the responses further and may have more comments as well, but we want to address these items as soon as possible.

Yours,



Joel H. Holt  
JH/H/jf

cc: Carl J. Hartmann III