

**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 REQUESTS FOR THE  
PRODUCTION OF DOCUMENTS TO FATHI YUSUF**

Each of the following requests is to be answered subject to the following four provisions:

A. Plaintiff asserts the existence of a stipulation with regard to acts of money laundering, tax evasion and related criminal matters entered into on March 31, 2014. If you agree that this stipulation exists, you need not respond to a request, but can simply indicate: "Not Answered Pursuant to the March 31, 2014 Stipulation."

B. Plaintiff asserts a Statute of Limitation bar to acts prior to 2006. If you agree that this bar exists, you need not respond to a request, but can simply indicate: "Not Answered Pursuant to the SOL Bar."

C. Plaintiff asserts that many of these requests are overly broad and irrelevant. If you agree, you need not respond to a request, but can simply indicate: "Not Answered as overly broad and irrelevant."

D. Plaintiff asserts that such requests at this time are untimely and has filed a motion in this regard. If you agree, you need not respond to a request, but can simply indicate: "Not Answered as untimely."

## **REQUESTS**

1. Please produce all financial records including statements of account for all checking, savings, credit, investment, trust, or escrow accounts, you or your wife have or had at any bank or financial institution anywhere in the world from 1986 through the present,
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 your wife have or had any legal or equitable interest from January 1, 1986 to date.
3. Please produce all documents provided to your or United'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.
4. Please produce all Tax Returns filed on your behalf from 1986 to present.
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.

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).

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 your wife have or had any interest.

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.

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 Please produce all documents relating to any cash withdrawn by you or your sons from the Plaza Extra Stores from January 1, 1986 to date including all documents relating to what was done with such cash.

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.

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

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 calculations, accounting records evidencing rent payments or rent due, claims or demands for rent, and rent payments.

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.

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.

16. Please produce all documents reflection your or United's and the source of funds for your or United's investment in any business other than Plaza Extra Supermarkets and Untied Corporation

17. Please produce all documents relating to the source of funds for the acquisition and operation of the businesses known as Mattress Pal, or any mattress or furniture related business including all documents pertaining to the organization, existence, and ownership of such businesses .

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

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.

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.

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

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 or your family members, other than salaries or direct reimbursements of costs.

23. Please produce all documents relating to any accounting claims -- or other claims or counterclaims you may have against Hamed, his sons or Plaza Extra Supermarkets for any type of relief including, but not limited to, money damages.

24. Please produce all documents relating to all defenses or offsets you have or may have with regard to the claims of Hamed.

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

26. Please produce all documents relating to all funds removed by you or your family from United Corporation, 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.

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

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

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

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

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

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

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

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

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

**Dated:** July 5, 2014



**Carl J. Hartmann III, Esq.**  
*Counsel for Waheed Hamed*  
5000 Estate Coakley Bay, L-6  
Christiansted, VI 00820  
Telephone: (340) 719-8941  
Email: carl@carlhartmann.com

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of July, 2014, I served a copy of the foregoing Motion by email, as agreed by the parties, on:

**Nizar A. DeWood**

The DeWood Law Firm  
2006 Eastern Suburb, Suite 101  
Christiansted, VI 00820  
[dewoodlaw@gmail.com](mailto:dewoodlaw@gmail.com)



**Gregory H. Hodges**

Law House, 10000 Frederiksberg Gade  
P.O. Box 756  
ST.Thomas, VI00802  
[ghodges@dtflaw.com](mailto:ghodges@dtflaw.com)

**Mark W. Eckard**

Eckard, P.C.  
P.O. Box 24849  
Christiansted, VI 00824  
[mark@markeckard.com](mailto:mark@markeckard.com)

**Jeffrey B. C. Moorhead**

1132 King Street  
Christiansted, VI 00820  
[jeffreymlaw@yahoo.com](mailto:jeffreymlaw@yahoo.com)