

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

MOHAMMAD HAMED , by his authorized)	
agent WALEED HAMED ,)	
)	CIVIL NO. SX-12-CV-370
Plaintiff,)	
)	ACTION FOR DAMAGES,
v.)	INJUNCTIVE AND
)	DECLARATORY RELIEF
FATHI YUSUF and UNITED CORPORATION ,)	
)	
Defendants.)	JURY TRIAL DEMANDED
)	

**FATHI YUSUF'S OBJECTIONS AND RESPONSES TO
COUNTERCLAIM DEFENDANT WAHEED HAMED'S REQUESTS FOR THE
PRODUCTION OF DOCUMENTS**

Defendant Fathi Yusuf ("Yusuf"), through his undersigned counsel, subject to the objections set forth below, respectfully answers as follows to Counterclaim Defendant Waheed Hamed's Requests for the Production of Documents ("Requests").

PRELIMINARY STATEMENT

These answers and objections are made solely for the purpose of this action. Each answer is subject to any and all objections as to competence, relevance, materiality, propriety, and admissibility; and any and all objections and grounds that would require the exclusion of any statement contained in any response, if such request were asked of, or any statement contained therein were made by, a witness present and testifying in court, all of which objections and grounds are hereby reserved and may be interposed at the time of trial.

The following answers are based upon information presently available to Yusuf and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Yusuf has answered or objected to any Request should not be taken as an admission that he accepts or admits the existence of any facts set forth or assumed by such

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Request, or that such answer constitutes admissible evidence. The fact that Yusuf has answered part or all of any such Request is not intended and shall not be construed to be a waiver by Yusuf of all or any part of any objection to such Request.

GENERAL OBJECTIONS

Yusuf makes the following general objections to the Requests. Although these general objections apply to all of the Requests, for convenience, they are set forth herein and are not necessarily repeated after each objectionable request. The assertion of the same, similar, or additional objections in the individual objections to these Requests, or the failure to assert any additional objections to a request does not waive any of Yusuf's objections as set forth below:

1. The Requests were served on July 5, 2014. At that time, the parties were operating under the Fourth Amended Scheduling Order ("Fourth Scheduling Order") entered by the Court on May 15, 2014. The Fourth Scheduling Order provided that fact discovery, including written discovery was to be completed by July 11, 2014. Despite the parties' efforts to attempt to agree to an extension of the discovery deadlines, no agreement has been reached. Yusuf and United Corporation ("United") have filed an Emergency Motion To Further Extend Discovery Deadlines and are hopeful that the Court will extend the fact discovery given the various circumstances described in the Emergency Motion. However, since fact discovery is currently closed and the Requests were not served in sufficient time to allow Yusuf 30 days to respond within the established discovery period, no response is required by Yusuf.

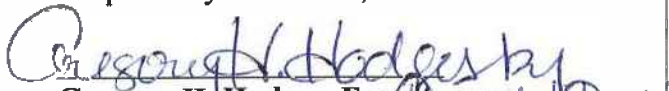
As a result of the expiration of the period for fact discovery on July 11, 2014, Yusuf's response to the Requests is not due and there is no legal effect to be drawn from the absence of a

specific response to the Requests. Moreover, Yusuf sets forth the following additional objections:

2. Yusuf objects to each Request that seeks information that is not relevant to his or Waheed Hamed's claims or defenses.
3. Yusuf objects to each Request to the extent it seeks the disclosure or production of documents or information protected by the attorney-client, work product or other privileges.
4. Yusuf objects to each Request that seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.
5. The information sought by the Requests may be as much as twenty-seven (27) years old. Documents that may have contained information relevant to the Requests may no longer be in existence. Thus any information provided herein may not be, and should not be considered complete, and may be subject to supplementation if additional information becomes available.
6. Yusuf objects to defined terms and instruction to the extent that they vary from applicable law and/or impose different obligations than those set forth in the Federal Rules of Civil Procedure.

Dated: August 7, 2014

Respectfully Submitted,


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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT a true and exact copy of the foregoing FATHI YUSUF'S OBJECTIONS AND RESPONSES TO COUNTERCLAIM DEFENDANT WAHEED HAMED'S REQUESTS FOR THE PRODUCTION OF DOCUMENTS was served via U.S. Mail, postage prepaid, fax, electronic mail or hand delivery on this the 7th day of August, 2014 to wit:

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