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

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
Defendants/Counterclaimants,	)	DECLARATORY RELIEF
	)	
VS.	Ĵ	JURY TRIAL DEMANDED
	Ĵ	
WALEED HAMED, WAHEED	Ĵ	
HAMED, MUFEED HAMED,	)	
HISHAM HAMED,	Ĵ	
and PLESSEN ENTERPRISES, INC.,	)	
	Ś	
Counterclaim Defendants	Ń	

## COUNTERCLAIM DEFENDANTS WALEED, WAHEED, MUFEED, AND HISHAM HAMEDS' JOINT RULE 26 INITIAL DISCLOSURES

Waleed, Waheed, Mufeed and Hisham Hamed, by and through their undersigned counsel,

pursuant to Fed.R.Civ.P. 26(a)(1), collectively serve their Initial Disclosures as follows:

#### WITNESSES:

- 1. Mohammed Hamed, Plaintiff has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 2. Waleed Hamed, Counterclaim Defendant has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 3. Waheed Hamed, Counterclaim Defendant has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 4. Mufeed Hamed, Counterclaim Defendant has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 5. Hisham Hamed, Counterclaim Defendant has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.

- 6. Fathi Yusuf has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 7. Mahar Yusuf has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 8. Yusuf Yusuf has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 9. Nejeh Yusuf has knowledge of all of the facts related to the allegations in the complaint, including those giving rise to this case.
- 10. Ayman Al- Khaled, c/o Seaside Market and Deli has knowledge of the accounting records of the three Plaza Extra Stores.
- 11. John Gaffney, c/o Plaza Extra West has knowledge of the accounting records of the three Plaza Extra Stores.
- 12. Wadda Charriez, works at Plaza Extra at Sion Farm, St. Croix.
- 13. Kareema Dorsette, works at Plaza Extra at Tutu Mall, St. Thomas.
- 14. Tamarah Parson-Smalls- c/o VI Bureau of Internal Revenue has knowledge of tax filings and tax payments.
- 15. Marcella Somersall c/o VI Bureau of Internal Revenue has knowledge of tax filings and tax payments.
- 16. Nisha Aubain- do Tropical Shipping & Construction Co., Ltd. has knowledge of contract between Plaza Extra and Tropical Shipping.

#### **DOCUMENTS:**

All documents previously produced by Plaintiff, Defendant or Counterclaim Defendants in this case.

#### **INSURANCE:**

None

#### **DAMAGES:**

Counterclaim defendants seek no damages othere than ancillary relief such as attorneys fees or costs that may be determined by the Court

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Dated: August 27, 2014

Respectfully submitted,

ECKARD, PC

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Counsel to Waleed, Mufeed and Hisham Hamed

-- and --

By:

Carl'J. Hartmann III, Esq. Counsel for Waheed Hamed 5000 Est. Coakley Bay, L6 Christiansted, VI 00820 Telephone: (340) 719-8941 Email: <u>carl@carlhartmann.com</u>

Counsel to Waheed Hamed

# CERTIFICATE OF SERVICE

I hereby certify that on this  $27^{\text{th}}$  day of August 2014, I served a copy of the foregoing in compliance with the parties consent, pursuant to Fed. R. Civ. P. 5(b)(2)(E), to electronic service of all documents in this action on the following persons:

Nizar A. DeWood, Esquire Email: dewoodlaw@gmail.com

Gregory H. Hodges, Esquire Email: ghodges@dtflaw.com

# Jeffrey B.C. Moorhead, Esquire

Counsel for Plessen Enterprises, Inc. Email: jeffreymlaw@yahoo.com Joel H. Holt, Esquire Counsel for Mohammad Hamed holtvi@aol.com

<sup>1</sup> Signed by Mark W. Eckard, Esquire, with permission granted by Carl Hartmann, Esquire.