

**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  
ADDITIONAL REQUESTS FOR THE PRODUCTION OF DOCUMENTS  
TO FATHI YUSUF AND UNITED**

Each of the following requests is to be answered subject to the following three 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."

## REQUESTS

1. Produce all documents obtained by you by use of subpoenas to persons or entities not parties to this action.
2. Produce all documents obtained by you regarding this action from September 2012 to date, by means other than discovery to parties and use of subpoenas to persons not parties to this action.
3. Produce all documents sent by you to, or supplied to you by any bank or other financial institution concerning the finances of plaintiff or the counterclaim defendants from September 2012 to date.
4. Produce all documents sent by you or received by you (you being Fathi Yusuf, United Corporation or your agents) and any supplier or vendor of Plaza Extra supermarkets or United Corporation d/b/a Plaza Extra Supermarkets regarding plaintiff, counterclaim defendants or their interests or rights. This shall include but not be limited to documents to and from Associated Grocers, Niagara Water and Seaside Market.

**Dated:** August 27, 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 27th day of August, 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)

**Joel H. Holt**

Law Offices of Joel H. Holt  
2132 Company Street  
Christiansted, VI 00820  
Email: [holtvi@aol.com](mailto:holtvi@aol.com)



Carl J. Harbman