

**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/Counterclaim Defendant,)	ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF
vs.)	
)	JURY TRIAL DEMANDED
FATHI YUSUF and UNITED CORPORATION ,)	
)	
Defendants/Counterclaimants,)	
vs.)	
)	
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,)	
)	
Additional Counterclaim Defendants.)	
)	

DEFENDANTS' SUPPLEMENTAL RULE 26(a)(1)(A) DISCLOSURES

Defendants/counterclaimants Fathi Yusuf and United Corporation (collectively, the "Defendants"), through their undersigned attorneys, Dudley, Topper and Feuerzeig, LLP, hereby provide their supplemental disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, applicable to these proceedings through Super. Ct. R. 7. These disclosures reflect information reasonably available to Defendants at this time. Defendants reserve the right to supplement these disclosures if additional or different information is obtained.

I. Disclosures Under Fed. R. Civ. P. 26(a)(1)(A)(i).

The following individuals may have information used to support Defendants' asserted claims or defenses:

1. Mohammed Hannun. Mr. Hannun has information relative to discussions between the parties, Waleed Hamed's acknowledgment that as of the time of the raid in 2001, the Hamed's drew at least \$1.6 million more than the Yusuf's and owed at least that amount to the Yusuf's. Mr. Hannan also has information

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relative to discussions as to the unpaid rent on the Plaza Extra store at Sion Farm, St. Croix, Waleed Hamed's agreement to pay rent for the ten year period prior to 2004 and Waleed's agreement that information as to the precise amount owed would be determined following the return of the "black book" from the FBI.

2. Suleiman Khaled. Mr. Suleiman has information relative to discussions between the parties, Waleed Hamed's acknowledgment that as of the time of the raid in 2001, the Hamed's drew at least \$1.6 million more than the Yusuf's and owed at least that amount to the Yusuf's.
3. Khaled Ali. Mr. Ali has information relative to discussions between the parties, Waleed Hamed's acknowledgment that as of the time of the raid in 2001, the Hamed's drew at least \$1.6 million more than the Yusuf's and owed at least that amount to the Yusuf's.
4. Bakier Hussein. Mr. Hussein has information relative to discussions between the parties, Waleed Hamed's admission that as of the time of the raid in 2001, the Hamed's drew at least \$1.6 million more than the Yusuf's and owed at least that amount to the Yusuf's. Mr. Hussein also has information relative to discussions as to the unpaid rent on the Plaza Extra store at Sion Farm, St. Croix, Waleed Hamed's agreement to pay rent for the ten year period prior to 2004 and Waleed's agreement that information as to the precise amount owed would be determined following the return of the "black book" from the FBI.

II. Disclosures Under Fed. R. Civ. P. 26(a)(1)(A)(ii).

The following documents may be used to support Defendants' asserted claims or defenses:

- 1) Merrill Lynch account records for Wally Hamed received in response to a Subpoena Duces Tecum and attached and designated FY 004506– 009990.

DUDLEY, TOPPER and FEUERZEIG, LLP

Dated: September 18, 2014

By:



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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of September, 2014, I caused the foregoing **Defendants' Supplemental Rule 26(a)(1)(A) Disclosures** to be served upon the following via e-mail and regular mail:

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