

**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,)
)
Defendants/Counterclaimants,)

vs.)

**ACTION FOR DAMAGES
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

WALEED HAMED, WAHEED)
HAMED, MUFEED HAMED,)
HISHAM HAMED,)
and **PLESSEN ENTERPRISES, INC.**,)
)
Counterclaim Defendants.)

JURY TRIAL DEMANDED

**COUNTERCLAIM DEFENDANT MUFEED HAMED'S
SECOND (2ND) SUPPLEMENTED RESPONSES TO DEFENDANTS'
MAY 23RD REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Counterclaim Defendant Mufeed Hamed hereby supplements his prior responses to the Rule 34 request served on him on May 23, 2014.

GENERAL OBJECTIONS

Mufeed Hamed 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 Request, or the failure to assert any additional objections to a request does not waive any of the objections as set forth below:

1. Mufeed Hamed objects to each Request that seeks information that is not relevant to the claims asserted against him in this case.
2. Mufeed Hamed 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.
3. Mufeed Hamed objects to each Request that seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.
4. The information sought by the Requests may be as much as twenty-seven (27) years old. Documents that may be 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.
5. Mufeed Hamed objects to defined terms and instructions to the extent that they vary from applicable law and/or impose different objections than those set forth in the Federal Rules of Civil Procedure.

RESPONSES

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 Hamed have or had any legal or equitable interest from January 1, 1986 to date.

2nd Supplemented Response: In addition to the “General Objections” raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. I also object to the request as stated, as it is confusing as worded. Subject to this objection, please see the attached **Exhibit A - List of Documents Produced**.

4. Please produce all Tax Returns filed on your behalf from 1986 to present.

2nd Supplemented Response: In addition to the “General Objections” raised above, which are incorporated herein by reference, this request is also objected to as unduly burdensome, unduly harassing and overly broad. Subject to this objection, please see the attached **Exhibit A - List of Documents Produced**.

17. Please produce all documents relating to the source of funds for the acquisition and operation of the businesses known as Five Corners and Five-H Holdings, Inc. including all documents pertaining to the organization, existence, and ownership of such businesses.

2nd Supplemented Response: In addition to the “General Objections” raised above, which are incorporated herein by reference, this request is objected to as unduly burdensome, unduly harassing and overly broad. It is also objected to as seeking information that is not relevant and

not likely to lead to relevant evidence. Finally, it is objected to as seeking information related to another suit, which is an improper use of discovery. This request is also objected to as too vague and confusing to comprehend what documents are being sought as far as the "acquisition" of the corporation is concerned. Notwithstanding these objections, to the extent this request is understood and without waiving any objections raised, please see the attached **Exhibit A - List of Documents Produced**.

Respectfully submitted,

ECKARD, PC

Dated: September 9, 2014


By: 

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Email: mark@markeckard.com

Counsel to Mufeed Hamed

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of September 2014, I served a disk containing responsive documents and 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: Nizar A. DeWood, Esquire (dewoodlaw@gmail.com); Gregory H. Hodges, Esquire (ghodges@dtflaw.com); Joel H. Holt, Esquire (holtvi@aol.com); and Jeffrey B.C. Moorhead, Esquire (jeffreymlaw@yahoo.com).



Mufeed Hamed
Exhibit A - List of Documents Produced
September 22, 2014

Bates Range	RFPD No.	
HAMD610809-HAMD610810	2	
HAMD611777-HAMD611777	2	
HAMD611780-HAMD611781	2	
HAMD611786-HAMD611787	2	
HAMD611784-HAMD611785	2	
HAMD611770-HAMD611770	2	
HAMD611774-HAMD611774	2	
HAMD611783-HAMD611783	2	
HAMD611002-HAMD611004	2	
HAMD611771-HAMD611772	2	
HAMD610836-HAMD610837	2	
HAMD611778-HAMD611778	2	
HAMD611782-HAMD611782	2	
HAMD611775-HAMD611776	2	
HAMD611773-HAMD611773	2	
HAMD611779-HAMD611779	2	
HAMD607527-HAMD607561	4	
HAMD607496-HAMD607526	4	
HAMD609356-HAMD609358	17	
HAMD609265-HAMD609268	17	
HAMD609255-HAMD609258	17	
HAMD609262-HAMD609264	17	
HAMD609227-HAMD609227	17	
HAMD609228-HAMD609250	17	
HAMD609259-HAMD609261	17	
HAMD609203-HAMD609212	17	
HAMD609196-HAMD609202	17	
HAMD609224-HAMD609224	17	
HAMD609362-HAMD609369	17	
HAMD609308-HAMD609310	17	
HAMD609335-HAMD609344	17	
HAMD609359-HAMD609361	17	
HAMD609352-HAMD609352	17	
HAMD609225-HAMD609226	17	
HAMD609275-HAMD609307	17	
HAMD609185-HAMD609190	17	
HAMD609191-HAMD609191	17	
HAMD609182-HAMD609184	17	
HAMD609345-HAMD609351	17	
HAMD609269-HAMD609269	17	
HAMD609251-HAMD609251	17	
HAMD609252-HAMD609254	17	
HAMD609353-HAMD609355	17	
HAMD609270-HAMD609274	17	

Mufeed Hamed
Exhibit A - List of Documents Produced
September 22, 2014

Bates Range	RFPD No.	
HAMD609311-HAMD609313	17	
HAMD609314-HAMD609326	17	
HAMD609213-HAMD609223	17	
HAMD609192-HAMD609195	17	
HAMD609327-HAMD609334	17	
Documents Produced Previously - Not Included in this Production		
HAMD563339-HAMD563340	4	
HAMD277434-HAMD277468	4	
HAMD277232-HAMD277262	4	
HAMD609081-HAMD609095	4	
HAMD563341-HAMD563344	4	