

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. Waleed Hamed objects to each Request that seeks information that is not relevant to the claims asserted against him in this case.
2. Waleed 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. Waleed 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. Waleed 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**. I know that some of my tax returns were seized by the FBI for some of the years prior to that, which records have been made available to you so that you have the same access to them as I do.

16. Please produce all documents relating to any claim Hamed may have with respect to expenses incurred in the Criminal Case including all documents reflecting checks issued from the Plaza Extra Accounts to pay such expenses.

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

20. 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**.


24. Please produce all documents reflecting payment of United's insurance and Gross Receipts Taxes from Plaza Extra Accounts from January 1, 1986 to date including checks issued for such payment.

2nd Supplemented Response: Object to as seeking irrelevant information that is not likely to lead to discoverable information for the time period prior to 2006. Notwithstanding this objection, please see the attached **Exhibit A - List of Documents Produced**.

Respectfully submitted,

ECKARD, PC

Dated: September 22, 2014

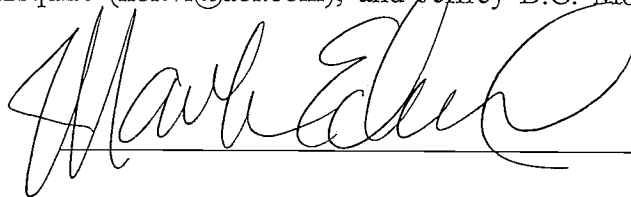
By: 

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Counsel to Waleed 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).



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

Bates Range	RFPD No.
HAMD610809-HAMD610810	2
HAMD611002-HAMD611004	2
HAMD610836-HAMD610837	2
HAMD606314-HAMD606314	16
HAMD604943-HAMD604943	16
HAMD606269-HAMD606269	16
HAMD604470-HAMD604470	16
HAMD606452-HAMD606452	16
HAMD606462-HAMD606462	16
HAMD604478-HAMD604478	16
HAMD606307-HAMD606307	16
HAMD606296-HAMD606296	16
HAMD604670-HAMD604670	16
HAMD604654-HAMD604654	16
HAMD606218-HAMD606218	16
HAMD606456-HAMD606456	16
HAMD604672-HAMD604672	16
HAMD604477-HAMD604477	16
HAMD604826-HAMD604826	16
HAMD605632-HAMD605632	16
HAMD606212-HAMD606212	16
HAMD604669-HAMD604669	16
HAMD604421-HAMD604421	16
HAMD606226-HAMD606226	16
HAMD604671-HAMD604671	16
HAMD606321-HAMD606321	16
HAMD606298-HAMD606298	16
HAMD604469-HAMD604469	16
HAMD606466-HAMD606466	16
HAMD606240-HAMD606240	16
HAMD604937-HAMD604937	16
HAMD604661-HAMD604668	16
HAMD606294-HAMD606294	16
HAMD606460-HAMD606460	16
HAMD604471-HAMD604471	16
HAMD606237-HAMD606237	16
HAMD606309-HAMD606309	16
HAMD604472-HAMD604472	16
HAMD604476-HAMD604476	16
HAMD604626-HAMD604660	16
HAMD606256-HAMD606256	16
HAMD606258-HAMD606258	16
HAMD606242-HAMD606242	16
HAMD605644-HAMD605644	16

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

Bates Range	RFPD No.
HAMD606215-HAMD606215	16
HAMD606303-HAMD606303	16
HAMD604304-HAMD604304	16
HAMD604577-HAMD604577	16
HAMD606316-HAMD606316	16
HAMD604473-HAMD604473	16
HAMD606220-HAMD606220	16
HAMD605632-HAMD605651	16
HAMD606300-HAMD606300	16
HAMD604579-HAMD604579	16
HAMD604479-HAMD604479	16
HAMD606448-HAMD606472	16
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HAMD604305-HAMD604305	16
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HAMD606222-HAMD606222	16
HAMD604613-HAMD604613	16
HAMD605442-HAMD605442	16
HAMD606260-HAMD606260	16
HAMD606235-HAMD606235	16
HAMD606458-HAMD606458	16
HAMD606450-HAMD606450	16
HAMD606277-HAMD606277	16
HAMD604673-HAMD604679	16
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HAMD604295-HAMD604295	16
HAMD606305-HAMD606305	16
HAMD604361-HAMD604361	16
HAMD606232-HAMD606232	16
HAMD604612-HAMD604612	16
HAMD606224-HAMD606224	16

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

Bates Range	RFPD No.
HAMD609356-HAMD609358	20
HAMD609265-HAMD609268	20
HAMD609255-HAMD609258	20
HAMD609262-HAMD609264	20
HAMD609227-HAMD609227	20
HAMD609228-HAMD609250	20
HAMD609259-HAMD609261	20
HAMD609203-HAMD609212	20
HAMD609196-HAMD609202	20
HAMD609224-HAMD609224	20
HAMD609362-HAMD609369	20
HAMD609308-HAMD609310	20
HAMD609335-HAMD609344	20
HAMD609359-HAMD609361	20
HAMD609352-HAMD609352	20
HAMD609225-HAMD609226	20
HAMD609275-HAMD609307	20
HAMD609185-HAMD609190	20
HAMD609191-HAMD609191	20
HAMD609182-HAMD609184	20
HAMD609345-HAMD609351	20
HAMD609269-HAMD609269	20
HAMD609251-HAMD609251	20
HAMD609252-HAMD609254	20
HAMD609353-HAMD609355	20
HAMD609270-HAMD609274	20
HAMD609311-HAMD609313	20
HAMD609314-HAMD609326	20
HAMD609213-HAMD609223	20
HAMD609192-HAMD609195	20
HAMD609327-HAMD609334	20
HAMD604379-HAMD604379	24
Documents Produced Previously -- Not Included in this Production	
HAMD277263-HAMD277293	4
HAMD563357-HAMD563362	4