

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

MOHAMMAD HAMED , by his)	CIVIL NO. SX-12-CV-370
authorized agent WALEED HAMED ,)	
)	
Plaintiff/Counterclaim Defendant,)	ACTION FOR DAMAGES,
)	INJUNCTIVE RELIEF
vs.)	AND DECLARATORY RELIEF
)	
FATHI YUSUF and UNITED CORPORATION ,)	JURY TRIAL DEMANDED
)	
Defendants/Counterclaimants,)	
)	
vs.)	
)	
WALEED HAMED, WAHEED HAMED,)	
MUFEED HAMED, HISHAM HAMED, and)	
PLESSEN ENTERPRISES, INC.,)	
)	
Additional Counterclaim Defendants.)	
_____)	

**FATHI YUSUF’S OBJECTIONS AND RESPONSES TO
PLAINTIFF’S REQUESTS FOR ADMISSION**

Defendant Fathi Yusuf (“Yusuf”), through his undersigned counsel, subject to the objections set forth below, respectfully answers as follows to Plaintiff’s Requests for Admissions (“Requests”).

PRELIMINARY STATEMENT

These answers and objections are made solely for the purpose of this action. Each answer is subject to all objections as to competence, relevance, materiality, propriety, and admissibility; and all objections and grounds that would require the exclusion of any statement contained in any response, if such request were asked of, or any statement contained therein were made by, a witness present and testifying in court, all of which objections and grounds are hereby reserved and may be interposed at the time of trial.

The following answers are based upon information presently available to Yusuf and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that Yusuf has answered or objected to any request should not be taken as an admission that he accepts or admits the existence of any facts set forth or assumed by such Request, or that such answer constitutes admissible evidence. The fact that Yusuf has answered part or all of any such Request is not intended and shall not be construed to be a waiver by him of all or any part of any objection to such Request.

GENERAL OBJECTIONS

Yusuf 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 Requests, or the failure to assert any additional objections to a request does not waive any of Yusuf's objections as set forth below:

1. Yusuf objects to each Request that uses the words "any" and "all" as being overbroad, unduly burdensome, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.
2. Yusuf objects to each Request that seeks information that is not relevant to his or plaintiff's claims or defenses.
3. Yusuf objects to each Request to the extent it seeks the disclosure of information protected by the attorney-client, work product or other privileges.
4. Yusuf objects to each Request to the extent that it uses terms or phrases that are vague, ambiguous, or undefined.

5. Yusuf objects to each Request that seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence.

6. Yusuf objects to each Request to the extent it seeks information outside of his possession, custody or control on the ground that it would subject Yusuf to undue burden, oppression and expense, and impose obligations not required by the Federal Rules of Civil Procedure.

7. The information sought by the Requests may be as much as twenty-seven (27) years old. Documents that may have 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.

8. Yusuf objects to defined terms and instruction to the extent that they vary from applicable law and/or impose different obligations than those set forth in the Federal Rules of Civil Procedure.

SPECIFIC OBJECTIONS AND RESPONSES

1. ADMIT your counsel Gregory Hodges stated to Plaintiff's counsel Joel Holt that the issue of the \$802,955 allegedly due to Hamed as set forth in SX.14-CV-278, is NOT an issue presented in the instant action.

RESPONSE:

Deny.

2. ADMIT that the issue of the \$802,955 allegedly due to Hamed set forth in SX.14-CV-278, is NOT an issue presented in the instant action.

RESPONSE:

Deny.

3. ADMIT that the issue of the \$802,955 allegedly due to Hamed as set forth in SX.14-CV-278, IS an issue presented in the instant action.

RESPONSE:

Admitted.

4. ADMIT that the issue of the purchase of real property in Estate Enfield Grene from the \$2.7 million withdrawn for Plaza Extra Supermarkets accounts as set forth in SX.14-CV-287, is NOT an issue presented in the instant action.

RESPONSE:

Admitted in that no such property is identified in the Amended Complaint in this case or its exhibits.

5. ADMIT that the issue of the purchase of real property in Estate Enfield Green from the \$2.7 million withdrawn for Plaza Extra Supermarkets accounts as set forth in SX.14-CV-287, is an issue presented in the instant action.

RESPONSE:

Denied in that no such property is identified in the Amended Complaint or its exhibits.

Respectfully submitted,

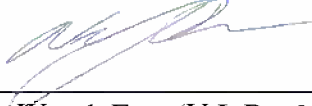
DUDLEY, TOPPER AND FEUERZEIG, LLP

Dated: September 24, 2014

By:

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Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of September, 2014, I caused the foregoing **Fathi Yusuf's Objections and Responses to Plaintiff's Requests for Admission** to be served upon the following via e-mail:

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