



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**

Counterclaim defendant Waleed Hamed responds to the additional requests for production of documents served on him on August 27, 2014 as follows:

*1. Please produce any and all documents identified in your responses to the Requests for Admission and Interrogatories served simultaneously herewith.*

Response to RFPD No. 1: As described therein.

*2. Please produce all information required by Fed. R. Civ. P. 26(a).*

Response to RFPD No. 2: As filed on August, 27, 2014.

*3. Please produce all documents relating to how proceeds or profits from the Plaza Extra Stores were distributed to you and your family members from January 1, 1986 to date.*

Response to RFPD No. 3: This request is identical to request no. 27, Fathi Yusuf's second set of RFPDs to counterclaim defendant Waleed Hamed, dated May 27, 2014. Please refer to the response Mr. Hamed gave on September 9, 2014:

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 refer to the responses to RFPDs numbers eight and nine. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do. Other documents may also be in the possession of the joint criminal counsel attorneys which are also equally available to you.

*4. Please produce all documents relating to the removal, transfer, subsequent transfer and use of funds from any of the Plaza Extra Accounts by you and your family members, other than salaries or direct reimbursements of costs.*

Response to RFPD No. 4: This request is identical to request no. 28, Fathi Yusuf's second set of RFPDs to counterclaim defendant Waleed Hamed, dated May 27, 2014. Please refer to the response Mr. Hamed gave on September 9, 2014:

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 refer to the responses to RFPDs numbers eight and nine. I know that some documents covered by this request prior to 2002 were seized by the FBI, which records have been made available to you so that you have the same access to them as I do. Other documents may also be in the possession of the joint criminal counsel attorneys which are also equally available to you.

*5. Please produce all documents relating to any defense you intend to assert with respect to the claims made against you in this case.*

Response to RFPD No. 5: This request is identical to request no. 40, Fathi Yusuf's second set of RFPDs to counterclaim defendant Waleed Hamed, dated May 27, 2014. Please refer to the response Mr. Hamed gave on September 9, 2014:

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. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

*6. Please produce all documents relating to each exhibit you intend to introduce into evidence at the trial of this case.*

Response to RFPD No. 6: This request is identical to request no. 41, Fathi Yusuf's second set of RFPDs to counterclaim defendant Waleed Hamed, dated May 27, 2014. Please refer to the response Mr. Hamed gave on September 9, 2014:

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. This request is also objected to as too vague and confusing to comprehend what documents are being sought. I also object to this request to the extent it seeks items covered by the work product of counsel and trial strategy, which is not discoverable under Rule 34. Finally, to the extent this request calls for information provided to expert witnesses, this request is also objected pursuant to Rule 26, which protects such

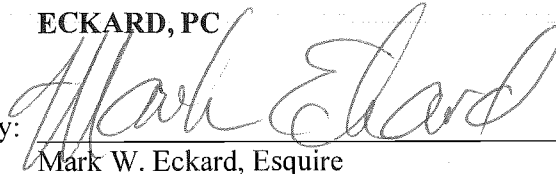
disclosures. Subject to these objections and to the extent this request is understood, I have no such documents.

Respectfully submitted,

**ECKARD, PC**

Dated: September 26, 2014

By:



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Counsel to Waleed, Mufeed and Hisham Hamed

**CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of September 2014, I served 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).

