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



# PLAINTIFF MOHAMMAD HAMED'S RESPONSES TO DEFENDANTS' 8/27/14 REQUESTS FOR DOCUMENTS 

## GENERAL OBJECTIONS

Mohammad 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. Mohammad Hamed objects to each Request that seeks information that is not relevant to the claims asserted against him in this case.

## Page 2

2. Mohammad 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. Mohammad 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. Mohammad 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

Plaintiff Mohammad Hamed responds to requests for documents served on him
on August 27, 2014 as follows:

1. Please produce all financial records including statements of account for all checking, savings, credit, investment, trust, or escrow accounts, you have or had at any bank or financial institution anywhere in the world from 1986 through the present.

Response to RFPD 1: 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. I also object to the request as stated, as it is confusing as worded. Subject to these objections, please see the attached Exhibit A - List of Documents Produced.
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 have or had any legal or equitable interest from January 1, 1986 to date.

Response to RFPD 2: At one time, I did have a joint account or two with Fathi Yusuf in Jordan. Those statements, however, were sent directly to Mr. Yusuf and not to me. I have not financial records in my possession that are responsive to this request.
3. Please produce all documents provided to your accountants from January 1, 1986 to date either for the preparation of tax returns, bookkeeping services, the preparation of financial statements, or loan applications.

Response to RFPD 3: 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. I also object to the request as stated, as it is confusing as worded. Subject to those objections, to the extent I understand this request, I have no such records for the tax years prior to 2002, although some of those records 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. Please see the attached Exhibit A - List of Documents Produced.
4. Please produce all statements from any brokerage or other accounts, including online based accounts, issued from January 1, 1986 to present pertaining to any stocks, bonds, stock options, debentures, mutual funds or other financial investments in which you or Hamed have or had any interest.

Response to RFPD 4: 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. I also object to the request as stated, as the term "financial investment" is vague and not capable of clear understanding as to what was intended to be covered. Subject to these objections, to the extent this request is understood, I have attached the documents that are in my possession (please see the attached Exhibit A - List of Documents Produced). I know that some documents fitting the description of items covered by this request were seized by the FBI, which records have been made available to you so that you have the same access to them as Ido.

## 5. Please produce all documents relating to any cash withdrawn by the Partners from the Plaza Extra Stores from January 1, 1986 to date including all documents relating to what was done with such cash.

Response to RFPD 5: 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, I have attached those documents in my possession (please see the attached Exhibit A - List of Documents Produced). 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, although the removal of cash by the partners prior to 2002 often did not involve the retention of such records, as Mike Yusuf testified in his deposition.

## 6. Please produce all documents relating to any cash withdrawn by any of

the Hamed family members from the Plaza Extra Stores from January 1, 1986 to date including all documents relating to what was done with such cash.

Response to RFPD 6: 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, I have attached those documents in my possession (please see the attached Exhibit A - List of Documents Produced). 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, although the removal of cash by the family members prior to 2002 often did not involve the retention of such records, as Mike Yusuf testified in his deposition.
7. Please produce all documents relating to any checks or wire transfers from any Plaza Extra Accounts to the Partners or to third parties on their behalves from January 1, 1986 to date including all documents relating to what was done with such funds.

Response to RFPD 7: 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, I have attached those documents in my possession (please see the attached Exhibit A - List of Documents Produced). 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.

> 8. Please produce all documents relating to any checks or wire transfers from any Plaza Extra Accounts to you, Hamed family members or to third parties on you or your sons behalves from January 1, 1986 to date including all documents relating to what was done with such funds.

Response to RFPD 8: 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, I have attached those documents in my possession (please see the attached Exhibit A - List of Documents Produced). 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.
9. Please produce all documents relating to any rent paid by or due from the Partnership for the Plaza Extra - East premises from January 1, 1986 to date including rent calculations, accounting records evidencing rent payments or rent due, claims or demands for rent, and rent payments.

Response to RFPD 9: 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, I have attached those documents in my possession (please see the attached Exhibit A - List of Documents Produced). I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. However, rent was generally paid in cash to Fathi Yusuf as the owner of United's Corporation so he could avoid paying taxes on it.
10. Please produce all documents either supporting, undermining, or relating to any of the statements and information set forth in the letter from Yusuf to Hamed dated August 15, 2012 identified at FY004123FY004210.

Response to RFPD 10: In addition to the "General Objections" raised above, which are incorporated herein by reference, this request is also objected to as too vague and confusing to comprehend what documents are being sought. To the extent this request is understood, those documents are attached (please see Exhibit A - List of Documents Produced).

> 11. Please produce all documents relating to any documents removed from the Plaza Extra Stores prior to the FBI raid in 2001 including any documents pertaining to the destruction of receipts or other documents.

Response to RFPD 11: 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. Subject to these objections and to the extent this request is understood, I have no such records in my possession. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. The only document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.

> 12. Please produce all documents relating to any claim Hamed may have with respect to stock losses allegedly caused by Yusuf including all documents reflecting checks deposited into any account used by Yusuf to generate such losses.

Response to RFPD 12: The documents I have are attached, which will be supplemented when others are obtained (please see the attached Exhibit A - List of Documents Produced).
13. Please produce all documents relating to any claim you 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.

Response to RFPD 13: 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.
14. Please produce all documents relating to the acquisition, improvement, cost of construction, and market value of all real estate in which you have or had an ownership interest from January 1, 1986 to date including documents pertaining to the source of funds for acquisition and improvement.

## Response to RFPD 14:

15. Please produce all documents relating to the "Black Book" and any pages missing from that document.

Response to RFPD 15: The "Black Book" was apparently removed from the place it was being stored (along with other items returned by the FBI) by the Yusufs without my knowledge, who also apparently removed the pages, so other than what the Yusufs produced in discovery, no such documents exist under my control, nor have I been able to locate the missing pages.
16. Please produce all documents the source of funds for the cash portion of the preliminary injunction bond posted in this case.

Response to RFPD_16: Object to as seeking irrelevant information that is not likely to lead to discoverable information. Notwithstanding this objection, to the extent I could locate such documents, copies of documents I have access to that are responsive to this request have been requested from the bank and will be supplied.

> 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.

Response to RFPD 17: 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. 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.
18. Please produce any financial statements prepared by or for you from January 1, 1986 to date.

Response to RFPD 18: 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 these objections, I am trying to locate any such documents and if located, they will be supplied.
19. Please produce all documents relating to the acquisition, improvement, cost of construction, and market value of all real estate in which you have or had an ownership interest from January 1, 1986 to date including all documents pertaining to the source of funds for acquisition and improvement.

Response to RFPD 19: This request is a duplicate of request number 14. Please see the response to request number 14.
20. 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.

Response to RFPD 20: 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, to the extent I could locate such documents, they are attached (please see Exhibit A - List of Documents Produced).
> 21. Please produce all documents generated in or relating to the Criminal Case that pertain to your or your sons' receipt of money in the form of cash, checks or wire transfers from the Plaza Extra Stores or the Plaza Extra Accounts from January 1, 1986 to date.

Response to RFPD 21: 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, I have no such records in my possession. 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.

[^0]Response to RFPD 22: 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 five and six. 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.
23. 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 23: 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 five and six. 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.
> 24. Please produce all documents relating to any claims or counterclaims you may have against Yusuf and United for any type of relief including, but not limited to, money damages.

Response to RFPD 24: I have not filed a counterclaim in this case. Regarding other claims, I have a suit pending against the Defendants filed by Lee Rohn. To the extent this request seeks those documents, I object to the Defendants using this case to get materials related to that case, as it would be an ex parte communication to seek such materials without going through Attorney Rohn.
25. Please produce all documents relating to all defenses or offsets you have or may have with regard to the claims of Yusuf and United.

Response to RFPD 25: This request is objected to as too vague and confusing to comprehend what documents are being sought, as the term "defenses' is a legal term for my counsel to address, which is why I have counsel since I am not a trained lawyer. Also, this request is objected to as seeking information protected by the work product rule. Notwithstanding this objection, to the extent this request is understood and without waiving any objections raised, Hamed is the plaintiff in this action. Plaintiff has made claims for declaration of a partnership, which has been conceded. All documents of record and documents submitted as exhibits with regard to that dispute meet this request and are in the possession of the defendants. To the extent that additional
documents on this claim are requested, they are denied as the issue has been conceded. Plaintiff has also detailed several post-2006 claims (e.g., $\$ 2.7$ million stolen by Yusuf in 2012, $\$ 500,000$ stolen by Yusuf to pay his attorneys, funds for gross receipt taxes and insurance taken by United, etc.). Documents responsive to request regarding these claims have been provided. Thus, Plaintiff objects to the repetitive and overly broad nature of this request.

> 26. Please produce all documents relating to all amounts which you and your family members have taken from the Plaza Extra Stores or Plaza Extra Accounts beyond salaries from January 1, 1986 to date.

Response to RFPD 26: 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. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Subject to these objections and to the extent this request is understood, please refer to the responses to RFPDs numbers five and six. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. Another document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.
> 27. Please produce all documents relating to all funds removed by you or your family from the Plaza Extra Stores or Plaza Extra Accounts that were used to buy real estate or other assets, and list all assets purchased, form of ownership, the date of purchase and the percentile owners at that time and now.

Response to RFPD 27: 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. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Finally, the request to "list all assets purchased, form of ownership, the date of purchase and the percentile owners at that time and now" is an interrogatory, not a request for the production of documents. Subject to these objections and to the extent this request is understood, I have no such records in my possession, although there are deeds recorded in the Virgin Islands and Jordan for property jointly owned by the Hameds and the Yusufs, which documents containing the information sought are equally available to you. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any such records exist. The only document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.
28. Please produce all documents relating to all investigations, reports,
studies, surveys, valuations or expert advice obtained by you and your family with regard to the Plaza Extra Stores from January 1, 2011 to date.

Response to RFPD 28: 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. 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.

> 29. Please produce all documents relating to all witnesses you or your family have interviewed and may or will call at trial in this matter. Provide all witness statements, notes and information provided by them to you.

Response to RFPD 29: 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. 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 to 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.
30. Please produce all accountings, valuations or other information pertaining to the valuation or division of the Plaza Extra Stores.

Response to RFPD 30: 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. 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.

> 31. Please produce all records kept by you and your family for keeping track of withdrawals and amounts due to the Hameds or Yusufs from January 1,1986 through December 31,2003 .

Response to RFPD 31: 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. This request is also objected to as too vague and confusing to comprehend what documents are being sought. Subject to these objections and to the extent this request is understood, please refer to the responses to RFPDs numbers five and six. I know that some documents covered by this request prior to 2002 may have been seized by the FBI, which records have been made available to you so that you have the same access to them as I do to the extent any -such records exist. The only document I am aware of regarding the destruction of records is the corporate deposition of United Corporation that is equally available to you where Mike Yusuf talks about destroying records.

> 32. Please produce the financial documents for all accounts and transactions on those accounts for Sixteen Plus and Plessen Enterprises, Inc.

Response to RFPD 32: 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. This request is also objected to as too vague and confusing to comprehend what documents are being sought. The attorney for the corporations (Beckstedt), and Fathi Yusuf have most of these documents as well as the accounting employees at the Plaza stores, which information is equally available to you. The entire body of documents seized by the U.S. Government may contain some of these requested documents, which Fathi Yusuf has the access to as do I.

## 33. Please produce all documents supporting any claims of Hamed against United.

Response to RFPD 33: United is the landlord for Plaza Extra-East supermarket. Aside from that, it is holding funds taken by the Yusufs in the so-called profits accounts, which involve the following: 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 that, documents for each of plaintiff's claims have been provided. Defendants have conceded the existence of the partnership. As set forth in Plaintiff's expert report, which has been supplied previously, the damages for Hamed's half are reflected in the 2013 and 2014 accounts of Plaza Extra supermarkets, as supplied therewith. As to plaintiff's additional claims, he has provided documents separately with regard to the $\$ 2.7$ million taken by the Yusufs, the $\$ 500,000+$ taken by Mr. Yusuf and paid to Attorney DiRuzzo, the $\$ 800,000+$ due for Dorthea, taxes and attorneys' fees paid on account of Fathi Yusuf's wrongdoing, as well as portions of gross receipt taxes and insurance amounts also set forth detail in exhibits to the expert's report (plaintiff's claims also the $\$ 15$ million+ of trading losses occasioned by Fathi Yusuf after he was instructed not to use business funds for trading options).

[^1]Response to RFPD 34: 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 that, documents for each of plaintiff's claims have been provided. Defendants have conceded the existence of the partnership. As set forth in Plaintiff's expert report, which has been supplied previously, the damages for Hamed's half are reflected in the 2013 and 2014 accounts of Plaza Extra supermarkets, as supplied therewith. As to plaintiff's additional claims,he has provided documents separately with regard to the $\$ 2.7$ million taken by the Yusufs, the $\$ 500,000+$ taken by Mr. Yusuf and paid to Attorney DiRuzzo, the $\$ 800,000+$ due for Dorthea, taxes and attorneys' fees paid on account of Fathi Yusuf's wrongdoing, as well as portions of gross receipt taxes and insurance amounts also set forth detail in exhibits to the expert's report (plaintiff's claims also the $\$ 15$ million+ of trading losses occasioned by Fathi Yusuf after he was instructed not to use business funds for trading options).

## 35. 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 35: 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 supplied documents responsive to the only claim by United, which remains with regards to rents owed for the period prior to 2002 and after 2011. With regard to Yusuf's claims that Hameds' took unequal and unauthorized funds, that is denied and no such documents exist. The documents which would have been relevant to this were the accounting documents for Plaza Extra supermarkets prior to 2012, which apparently have been lost, destroyed, or otherwise made unavailable as these have been requested from Fathi Yusuf and United, who were in charge of the office functions, including accounting. This is set forth in more detail in the expert report of the accountant, David Jackson, which has already been provided to the defendants.
36. Please produce all documents relating to each exhibit you intend to introduce into evidence at the trial of this case.

Response to RFPD 36: 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. 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.

Dated: September 26, 2014


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## CERTIFICATE OF SERVICE

I hereby certify that on this $26^{\text {th }}$ day of September, 2014, I served a copy of the foregoing Responses and documents by email, as agreed by the parties, on:

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## Mohammad Hamed

Exhibit A - List of Documents Produced
September 26, 2014

| Bate Range | RFPD No. |
| :---: | :---: |
| HAMD595213-HAMD595220 | 1 |
| HAMD610635-HAMD610635 | 3 |
| HAMD610640-HAMD610640 | 3 |
| Documents Previously Produced - Not Included in this Production |  |
| HAMD593818-HAMD593818 | 1 |
| HAMD203415-HAMD203415 | 1 |
| HAMD594215-HAMD594246 | 1 |
| HAMD594677-HAMD594678 | 1 |
| HAMD593825-HAMD593825 | 1 |
| HAMD593821-HAMD593821 | 1 |
| HAMD594189-HAMD594214 | 1 |
| HAMD594679-HAMD594681 | 1 |
| HAMD593816-HAMD593816 | 1 |
| HAMD594247-HAMD594267 | 1 |
| HAMD593800-HAMD593813 | 1 |
| HAMD593817-HAMD593817 | 1 |
| HAMD593814-HAMD593814 | 1 |
| HAMD593822-HAMD593822 | 1 |
| HAMD593956-HAMD593973 | 1 |
| HAMD593819-HAMD593819 | 1 |
| HAMD593823-HAMD593823 | 1 |
| HAMD594147-HAMD594188 | 1 |
| HAMD593886-HAMD593945 | 1 |
| YUF102638-YUF102690 | 1 |
| HAMD593826-HAMD593885 | 1 |
| HAMD593974-HAMD594001 | 1 |
| HAMD593815-HAMD593815 | 1 |
| HAMD593946-HAMD593955 | 1 |
| HAMD594002-HAMD594071 | 1 |
| HAMD593820-HAMD593820 | 1 |
| HAMD593824-HAMD593824 | 1 |
| HAMD594682-HAMD594684 | 1 |
| HAMD594072-HAMD594146 | 1 |
| HAMD489526-HAMD489563 | 4 |
| HAMD223604-HAMD223604 | 4 |
| HAMD355301-HAMD355344 | 4 |
| HAMD443026-HAMD443026 | 4 |
| HAMD223584-HAMD223588 | 4 |
| HAMD545683-HAMD545720 | 4 |
| HAMD443027-HAMD443027 | 4 |
| HAMD358329-HAMD358374 | 4 |
| HAMD492688-HAMD492733 | 4 |
| HAMD545553-HAMD545596 | 4 |
| HAMD545597-HAMD545642 | 4 |

## Mohammad Hamed

Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
| :---: | :---: |
| HAMD223599-HAMD223603 | 4 |
| HAMD223589-HAMD223593 | 4 |
| HAMD223579-HAMD223583 | 4 |
| HAMD223573-HAMD223573 | 4 |
| HAMD223574-HAMD223578 | 4 |
| HAMD443025-HAMD443025 | 4 |
| HAMD223568-HAMD223572 | 4 |
| HAMD489440-HAMD489485 | 4 |
| HAMD223594-HAMD223598 | 4 |
| HAMD443022-HAMD443022 | 4 |
| HAMD355391-HAMD355430 | 4 |
| HAMD489486-HAMD489525 | 4 |
| HAMD443029-HAMD443029 | 4 |
| HAMD443030-HAMD443030 | 4 |
| HAMD489363-HAMD489395 | 4 |
| HAMD443023-HAMD443023 | 4 |
| HAMD545643-HAMD545682 | 4 |
| HAMD545520-HAMD545552 | 4 |
| HAMD355431-HAMD355468 | 4 |
| HAMD355268-HAMD355300 | 4 |
| HAMD443028-HAMD443028 | 4 |
| HAMD548996-HAMD549041 | 4 |
| HAMD489396-HAMD489439 | 4 |
| HAMD355345-HAMD355390 | 4 |
| HAMD443024-HAMD443024 | 4 |
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| YUF101658-YUF101658 | 6 |

## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed

## Exhibit A - List of Documents Produced

September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed <br> Exhibit A - List of Documents Produced September 26, 2014

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## Mohammad Hamed <br> Exhibit A - List of Documents Produced

September 26, 2014

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## Mohammad Hamed Exhibit A - List of Documents Produced <br> September 26, 2014

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## Mohammad Hamed

## Exhibit A - List of Documents Produced <br> September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed <br> Exhibit A - List of Documents Produced <br> September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed <br> Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed

Exhibit A - List of Documents Produced
September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed <br> Exhibit A - List of Documents Produced

September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed <br> Exhibit A - List of Documents Produced <br> September 26, 2014

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## Mohammad Hamed

 Exhibit A - List of Documents ProducedSeptember 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

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## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

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## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

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## Mohammad Hamed Exhibit A - List of Documents Produced

September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed

## Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed Exhibit A - List of Documents Produced

September 26, 2014

| Bate Range | RFPD No. |
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## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

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## Mohammad Hamed

 Exhibit A - List of Documents Produced September 26, 2014| Bate Range | RFPD No. |
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| HAMD205245-HAMD205248 | 12 |
| HAMD440084-HAMD440092 | 12 |

## Mohammad Hamed <br> Exhibit A - List of Documents Produced <br> September 26, 2014

| Bate Range | RFPD No. |
| :---: | :---: |
| HAMD204926-HAMD204933 | 12 |
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| HAMD604681-HAMD604681 | 13 |
| HAMD606882-HAMD606882 | 13 |
| HAMD606888-HAMD606888 | 13 |

## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
| :---: | :---: |
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| HAMD606918-HAMD606938 | 13 |
| HAMD606873-HAMD606892 | 13 |
| HAMD604687-HAMD604687 | 13 |
| HAMD606846-HAMD606846 | 13 |

## Mohammad Hamed

Exhibit A - List of Documents Produced
September 26, 2014

| Bate Range | RFPD No. |
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| HAMD609224-HAMD609224 | 17 |
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| HAMD609308-HAMD609310 | 17 |
| HAMD609370-HAMD609379 | 17 |
| HAMD609335-HAMD609344 | 17 |
| HAMD609359-HAMD609361 | 17 |
| HAMD609380-HAMD609394 | 17 |
| HAMD609352-HAMD609352 | 17 |
| HAMD609225-HAMD609226 | 17 |
| HAMD609275-HAMD609307 | 17 |

## Mohammad Hamed

Exhibit A - List of Documents Produced
September 26, 2014

| Bate Range | RFPD No. |
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| HAMD609185-HAMD609190 | 17 |
| HAMD609191-HAMD609191 | 17 |
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## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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| HAMD605246-HAMD605265 | 20 |
| HAMD606493-HAMD606494 | 20 |

## Mohammad Hamed Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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| HAMD604493-HAMD604508 | 20 |
| HAMD606353-HAMD606374 | 20 |

## Mohammad Hamed <br> Exhibit A - List of Documents Produced September 26, 2014

| Bate Range | RFPD No. |
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| HAMD605106-HAMD605130 | 20 |
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## Mohammad A. Hamed <br> Tax Documents <br> 2011

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## FORM SSA-1099 - SOCIAL SECURITY BENEFIT STATEMENT



## FORM SSA-1099 - SOCIAL SECURITY BENEFIT STATEMENT





# Mohammad A. Hamed <br> Tax Documents <br> 2012 

## FORM SSA-1099 - SOCIAL SECURITY BENEFIT STATEMENT

20 - PART OF YOUR SOCIAL SECURITY BENEFITS SHOWN IN BOX 5 MAY BE TAXABLE INCOME. - SEE THE REVERSE FOR MORE INFORMATION.


## FORM SSA-1099 - SOCIAL SECURITY BENEFIT STATEMENT





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[^0]:    22. 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.
[^1]:    34. Please produce all documents supporting any claims of Hamed against Yusuf.
[^2]:    

