

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

MOHAMMAD HAMED, by his)
authorized agent **WALEED HAMED**,)

Plaintiff/Counterclaim Defendant,)

vs.)

FATHI YUSUF and UNITED CORPORATION,)

Defendants/Counterclaimants,)

vs.)

WALEED HAMED, WAHEED HAMED,)
MUFEED HAMED, HISHAM HAMED, and)
PLESSEN ENTERPRISES,)

Additional Counterclaim Defendants.)

CIVIL NO. SX-12-CV-370

ACTION FOR DAMAGES,
INJUNCTIVE RELIEF
AND DECLARATORY RELIEF

JURY TRIAL DEMANDED

**DEFENDANT FATHI YUSUF'S MOTION TO COMPEL RESPONSES TO
DISCOVERY REQUESTS AND FOR SANCTIONS AS TO
MOHAMMAD HAMED AND WALEED HAMED**

Defendant Fathi Yusuf ("Yusuf"), through his undersigned attorneys, respectfully submits this Motion To Compel Responses to Discovery Requests And For Sanctions against Plaintiff Mohammad Hamed ("Hamed") and Waleed ("Waleed"), pursuant to LRCi 37.2, made applicable to proceedings in this Court by Super. Ct. R. 7 and 39. As more fully set forth in the accompanying memorandum, Hamed and Waleed have failed to provide full, complete, and non-evasive responses to Yusuf's discovery requests.

Accordingly, Yusuf respectfully requests this Court to enter an Order: (1) compelling Hamed and Waleed to provide complete and non-evasive responses to Yusuf's Additional

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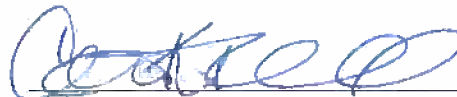
8/27/2014 Requests For Production of Documents, Interrogatories and Requests to Admit, within ten (10) days of such Order; (2) awarding Yusuf his costs and attorneys' fees incurred in connection with the Motion, and; (3) granting such further relief as is just and proper.

Respectfully submitted,

DUDLEY, TOPPER and FEUERZEIG, LLP

Dated: October 6th, 2014

By:



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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of October, 2014, I caused the foregoing **DEFENDANT FATHI YUSUF'S MOTION TO COMPEL RESPONSES TO DISCOVERY REQUESTS AND FOR SANCTIONS AS TO MOHAMMAD HAED AND WALEED HAMED** to be served upon the following via e-mail:

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