

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

UNITED CORPORATION,) Case No. SX-13-CV-03
)
<i>Plaintiff,</i>) ACTION FOR DAMAGES INJUNCTIVE
) RELIEF AND DECLARATORY RELIEF
)
v..)
)
WALEED HAMED,)
)
<i>Defendant.</i>)
<hr style="width:100%; border: 0.5px solid black;"/>)

**RESPONSES AND OBJECTIONS OF WALEED HAMED TO
PLAINTIFF'S FIRST SET OF REQUESTS TO PRODUCE TO
DEFENDANT WALEED HAMED**

Waleed Hamed (“Mr. Hamed”) responds and objects to the First Set of Requests to Produce (each, individually, a “Request” and, collectively, the “Requests”) propounded upon Mr. Hamed by the above-captioned plaintiff (“Plaintiff”) as follows:

GENERAL OBJECTIONS

In addition to the specific objections separately set forth in response to each numbered Request, Mr. Hamed’s responses are subject as a whole to the following general objections, which are incorporated into each response and objection, whether or not specifically referred to therein. Undersigned counsel for Mr. Hamed is willing to meet with Plaintiff’s counsel promptly in an effort to discuss and address Mr. Hamed’s concerns and objections to the Requests.

1. Mr. Hamed generally objects to the Requests to the extent that they seek to impose discovery obligations upon Mr. Hamed that are broader than, or inconsistent with the Constitution of the United States, the Rules of the Superior Court, Local Rules of Civil Procedure of the District Court of the Virgin Islands of the United States, the Federal Rules of Civil Procedure, Federal Rules of Evidence, or any other applicable rules or law.

2. Mr. Hamed generally objects to the Requests to the extent that they are overly broad, unduly burdensome, vague, and/or ambiguous.

3. Mr. Hamed generally objects to the Requests to the extent that they call for information that is neither relevant to the above-captioned civil action (this “Action”) nor reasonably calculated to lead to the discovery of admissible evidence.

4. Mr. Hamed generally objects to the Requests to the extent that they seek information that is already in Plaintiff’s possession, is available in the public domain, or is equally available to Plaintiff as it is to Mr. Hamed.

5. Mr. Hamed generally objects to the Requests to the extent that they seek information that is obtainable from another source that is more convenient and that is less burdensome and less expensive.

6. Mr. Hamed generally objects to the Requests to the extent that they seek information that is not within Mr. Hamed’s possession, custody or control.

7. Mr. Hamed generally objects to the Requests to the extent that they call for the information subject to a claim of privilege and/or immunity, including, without limitation, the attorney-client privilege and/or attorney work-product doctrine. The inadvertent disclosure of any information subject to such privileges and/or protections is not intended to relinquish any privilege and/or protection and shall not be deemed to constitute a waiver of any applicable privilege and/or protection.

8. Mr. Hamed generally objects to the Requests to the extent that they seek confidential, proprietary, or personal information.

9. Mr. Hamed generally objects to the definition of “document” and/or “record” as overly broad, unduly burdensome and to the extent that it purports to impose obligations upon Mr.

Hamed beyond the requirements of the Rules of the Superior Court, Local Rules of Civil Procedure of the District Court of the Virgin Islands of the United States, the Federal Rules of Civil Procedure, Federal Rules of Evidence, or any other applicable rules or law.

10. To the extent that Mr. Hamed provides any information in response to the Requests or any particular Request, Mr. Hamed does not concede that the Requests or any particular Request seek information that is relevant to the claims or defenses of any party to this Action. Similarly, Mr. Hamed does not concede that the Requests or any particular Request seek information that is reasonably calculated to lead to the discovery of admissible evidence. Mr. Hamed instead expressly reserves all further objections to the relevance and admissibility of any information that must be provided pursuant to the Requests or any particular Request, if any, as well as the right to object to further discovery relating to the subject matter of any information provided.

11. Mr. Hamed reserves the right to supplement his objections and responses, as appropriate.

SPECIFIC RESPONSES AND OBJECTIONS

1. With respect to your answers or responses to the Plaintiff's First Set of Interrogatories, please identify and produce each, every, and all documents, reports, writings, recordings, or electronic records which relates in any way to this matter.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 1 as follows:

Mr. Hamed objects to Request No. 1 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply.

2. Please provide copies of all financial records, bank statements relating to each security/stock listed in your 1992 and 1993 tax returns.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 2 as follows:

None.

3. Please provide copies of all financial records, including statements of account for all operating, savings, credit, or escrow accounts for the years 1986 through 2001.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 3 as follows:

Mr. Hamed objects to Request No. 3 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply.

4. Please provide all documents, writings, and recordings relating to or supporting your Answer to Plaintiff's Complaint.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 4 as follows:

Mr. Hamed objects to Request No. 4 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply.

5. Please provide all documents, writings and recordings relating to our supporting your position in relationship to Defendants' affirmative defenses.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 5 as follows:

Mr. Hamed objects to Request No. 5 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply.

6. All documents, writings, and recordings relating to each exhibit you intend to introduce into evidence at the trial of this case.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 6 as follows:

No decision has been made as to which documents will be used at trial. This answer will be supplemented when possible.

7. A copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by or on behalf of you, for any and all personal income (or loss) for the years 1986 through present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 7 as follows:

Mr. Hamed objects to Request No. 7 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient tax records.

8. A copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by, or on your behalf, for any and all business /professional income (or loss) for the years 1986 through present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 8 as follows:

Mr. Hamed objects to Request No. 8 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response,

Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient tax records.

9. Copies of any and all bank account statements, for any and all bank accounts (foreign and domestic), held individually or jointly in your name, held on your behalf by a third party, or the name of any entity in which you have a legal interest from 1986 through present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 9 as follows:

Mr. Hamed objects to Request No. 9 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient banking records.

10. A list of all accounts holding stocks, bonds, securities, or other negotiable instruments, not otherwise identified and/or provided pursuant to the above requests, held in your name, and/or in the name of your wife, children, or other third parties, in part or whole, or in which you have a financial, personal or business interest/stake.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 10 as follows:

Mr. Hamed objects to Request No. 10 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient securities records.

11. All of your bankbooks and bank statements (including savings and checking accounts) from 1990 through the present (include any statements for other accounts into which you deposit money).

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 11 as follows:

Mr. Hamed objects to Request No. 11 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient banking records.

12. Any certificates of deposit you may have an interest in.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 12 as follows:

Mr. Hamed objects to Request No. 12 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient records related to any certificates of deposit.

13. Produce copies of all investment portfolios you ever held.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 13 as follows:

Mr. Hamed objects to Request No. 13 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient investment portfolio records.

14. All of your credit card statements from January 1990 to present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 14 as follows:

Mr. Hamed objects to Request No. 14 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient credit card records.

15. Deed(s), contract(s), lease(s), or other similar documentary evidence of your ownership of any interest in real property from January 1, 1986 to present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 16 as follows:

Mr. Hamed objects to Request No. 16 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient real estate records.

16. Copies of all statements from any account, including all online based accounts, issued from January 1st, 1986 to present in connection with any brokerage accounts, relating to any stocks, bonds, stock options, debentures, and mutual funds, or other financial investment you may have had.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 16 as follows:

Mr. Hamed objects to Request No. 16 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient securities records.

17. All written evidence of any interest you have had in any business from January 1, 1986 to present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 17 as follows:

Mr. Hamed objects to Request No. 17 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient business records.

18. All copies of loan applications you have applied for from 1986 to present.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 18 as follows:

Mr. Hamed objects to Request No. 18 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient loan application records.

19. Copies of all statements, documents, receipts, slips, etc. regarding any gambling account, including online gambling, you have ever opened in the United States, Caribbean, or any other jurisdiction.

Subject to and without waiver of the above-stated General Objections, each of which is incorporated by reference as though fully set forth herein, Mr. Hamed responds to Request No. 19 as follows:

Mr. Hamed objects to Request No. 19 as an overly broad and unduly burdensome request, with which it is impossible for Mr. Hamed to comply. By way of further response, Mr. Hamed objects to requests for information from time periods irrelevant to this Action and generally states that he has not kept ancient records of the sort requested in Request No. 19. Mr. Hamed also objects to Request No. 19 as requesting information that is entirely irrelevant to this Action.

Respectfully submitted,

ECKARD, PC

Dated: March 14, 2014

By: /s/ Mark W. Eckard
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Counsel to Waleed Hamed

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail by parties' stipulation on this the 14th day of March, 2014 to the following:

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