

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

MOHAMMAD HAMED , by his)	
authorized agent WALEED HAMED ,)	
)	
<i>Plaintiff/Counterclaim</i> Defendant,)	
)	
vs.)	CIVIL NO. SX-12-CV-370
)	
FATHI YUSUF and)	
UNITED CORPORATION ,)	
)	
Defendants/Counterclaimants,)	
)	ACTION FOR DAMAGES
vs.)	INJUNCTIVE RELIEF AND
)	DECLARATORY RELIEF
WALEED HAMED, WAHEED)	
HAMED, MUFEED HAMED,)	
HISHAM HAMED,)	JURY TRIAL DEMANDED
and PLESSEN ENTERPRISES, INC. ,)	
)	
Counterclaim Defendants.)	
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**COUNTERCLAIM DEFENDANT MUFEED HAMED'S
SUPPLEMENTED RESPONSES TO DEFENDANTS'
MAY 23rd REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Counterclaim Defendant Mufeed Hamed hereby supplements his prior responses to the Rule 34 request served on him on May 23, 2014.

PRELIMINARY STATEMENT

On June 26, 2014, Mufeed ("Mafi") Hamed (referred to as "Counterclaim Defendant" herein) responded to Counterclaimants' May 23rd Rule 34 Request, answering for himself personally and not in any representative capacity, stating:

. . . object to the untimely service of the request -- which will not be answered until the motion presently before the Court on the issue has been decided.

The Court, while not expressly deciding the motion for a protective order, subsequently issued a

superseding "Fifth Amended Scheduling Order" which Hamed believes requires the initial response to now be supplemented with answers. Indeed, the motion for a protective order was withdrawn after the new scheduling order was entered.

Additionally, these answers and objections are made solely for the purpose of this action. Each answer is subject to any and all objections as to competence, relevance, materiality, propriety, and admissibility; and any 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.

Finally, the following answers are based upon information presently available to Mufeed Hamed and, except for explicit facts admitted herein, no incidental or implied admissions are intended hereby. The fact that he 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 he has answered part or all of any such Request is not intended and shall not be construed to be a waiver by Yusuf of all or any part of any objection to such Request.

GENERAL OBJECTIONS

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

2. Mufeed 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. Mufeed 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. Mufeed 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

1. Please produce all financial records including statements of account for all checking, savings, credit, investment, trust, or escrow accounts, you and Hamed have or had at any bank or financial institution anywhere in the world from 1986 through the present, including but not limited to:

- a. Banco Popular Account No. 191- 045535*
- b. Scotiabank Account No. 45609811*
- c. Banco Popular Visa, Account No. ending 3230*
- d. Visa Account No. ending 1263*
- e. Visa Account No. ending 4662*
- f. Amex Gold Card Account No. 330001*

Supplemented Response: 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 those objections, there are no such joint accounts to my knowledge in the name of Mufeed Hamed **AND** Mohammed Hamed as requested. This matter was discussed in the Rule 37 conference and Defendants did not amend or alter the question -- thus it is assumed the conjunction was intended.

*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 or Hamed have or had any legal or equitable interest** from January 1, 1986 to date.*

Supplemented Response: 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 this objection, to the extent this request is understood, there are no such accounts in the

name of these persons in which my father or I have an equitable interest that I am aware of, except for joint accounts with my wife (not attached) and a joint account with my brother, Waleed Hamed, which documents are attached.

3. Please produce all documents provided to your and Hamed's accountants from January 1, 1986 to date either for the preparation of tax returns, bookkeeping services, the preparation of financial statements, or loan applications.

Supplemented Response: 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. I did provide the attached records to the accountant who did my tax returns for the years 2012-2013.

4. Please produce all Tax Returns filed on your behalf from 1986 to present.

Supplemented Response: 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 the ones in my possession.

5. If you contend there were any errors made in any of your Tax Returns filed after 1986, please produce any and all documentation that demonstrates the errors in such returns and the actions you took to correct these errors.

Supplemented Response: There are no such documents.

6. Please produce deed(s), contract(s), lease(s), or other similar documentary evidence of your ownership of any interest (including leasehold interests) in real property, from January 1, 1986 to present (regardless if you have transferred, sold, or otherwise disposed of these assets).

Supplemented Response: 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, to the extent I still have any such documents regarding real property in my name, they are attached.

7. 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.

Supplemented Response: 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. 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 I do.

8. 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.

Supplemented Response: 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. 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.

9. Please produce all documents relating to any cash withdrawn by you or your brothers from the Plaza Extra Stores from January 1, 1986 to date including all documents relating to what was done with such cash.

Supplemented Response: 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. 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.

10. 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.

Supplemented Response: 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. 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.

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

Supplemented Response: 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. 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.

12. 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 accounting records evidencing rent payments or rent due, claims or demands for rent, and rent payments.

Supplemented Response: 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. 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.

13. 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 FY004123- FY004210.

Supplemented Response: 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.

14. 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.

Supplemented Response: 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.

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

Supplemented Response: 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.

Supplemented Response: Object to as seeking irrelevant information that is not likely to lead to discoverable information. Notwithstanding this objection, to the extent we could locate such documents, they 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.

Supplemented Response: 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, the documents are attached which include the articles of incorporation and original commitment letter.

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

Supplemented Response: 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, we are 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.

Supplemented Response: 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, the documents I have that are responsive to this request are attached.

20. Please produce all documents generated in or relating to the Criminal Case that pertain to your, Hamed's or your brothers' 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.

Supplemented Response: 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.

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

Supplemented Response: 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.

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

Supplemented Response: 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.

23. 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.

Supplemental Response: 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.

24. Please produce all documents relating to all defenses or offsets you have or may have with regard to the claims of Yusuf and United.

Supplemented Response: 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. Finally, 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, I am not asserting any offsets 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 amounts which you, Hamed and your family members have taken from the Plaza Extra Stores or Plaza Extra Accounts beyond salaries from January 1, 1986 to date.

Supplemented Response: 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, please refer to the responses to RFPDs numbers eight and nine. 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.

26. Please produce all documents relating to all funds removed by you, Hamed, 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.

Supplemented Response: 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. 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.

27. Please produce all documents relating to all investigations, reports, studies, surveys, valuations or expert advise [sic] obtained by you, Hamed, and your family with regard to the Plaza Extra Stores from January 1, 2011 to date.

Supplemented Response: 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.

28. Please produce all documents relating to all witnesses you, Hamed, 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.

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.

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

Supplemented Response: 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.

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

Supplemented Response: 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, please refer to the responses to RFPDs numbers eight and nine. 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.

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

Supplemented Response: 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. 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.

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

Supplemented Response: 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.

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

Supplemented Response: 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.

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

Supplemented Response: 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.

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

Supplemented Response: 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.

ECKARD, PC

Dated: September 9, 2014

By: /s/ Mark W. Eckard

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Email: mark@markeckard.com

Counsel to Waleed, Mufeed and Hisham Hamed

CERTIFICATE OF SERVICE

I hereby certify that on this 9th 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).

/s/ Mark W. Eckard

**Mufeed Hamed Supplemental Production - RFPDs Numbers Correlated to Bates Number
(September 9, 2014)**

Bates Range	RFPD Number
HAMD592964-HAMD592965	2
HAMD592927-HAMD592928	2
HAMD593007-HAMD593008	2
HAMD592995-HAMD593000	2
HAMD592974-HAMD592974	2
HAMD592985-HAMD592986	2
HAMD607579-HAMD607581	2
HAMD592968-HAMD592968	2
HAMD593027-HAMD593028	2
HAMD592978-HAMD592979	2
HAMD592925-HAMD592926	2
HAMD607562-HAMD607565	2
HAMD592966-HAMD592967	2
HAMD592929-HAMD592930	2
HAMD592948-HAMD592950	2
HAMD593071-HAMD593072	2
HAMD592980-HAMD592980	2
HAMD592959-HAMD592959	2
HAMD607595-HAMD607597	2
HAMD592962-HAMD592963	2
HAMD607582-HAMD607584	2
HAMD592960-HAMD592961	2
HAMD593053-HAMD593064	2
HAMD592953-HAMD592956	2
HAMD593033-HAMD593038	2
HAMD592944-HAMD592944	2
HAMD592940-HAMD592941	2
HAMD592945-HAMD592947	2
HAMD592931-HAMD592932	2
HAMD592987-HAMD592990	2
HAMD592976-HAMD592976	2
HAMD593001-HAMD593004	2
HAMD607569-HAMD607571	2
HAMD592991-HAMD592994	2
HAMD607575-HAMD607578	2
HAMD592938-HAMD592939	2
HAMD607589-HAMD607591	2
HAMD592975-HAMD592975	2
HAMD593011-HAMD593014	2
HAMD593025-HAMD593026	2
HAMD592942-HAMD592943	2
HAMD592935-HAMD592937	2
HAMD607592-HAMD607594	2
HAMD593015-HAMD593016	2
HAMD593039-HAMD593050	2
HAMD592923-HAMD592923	2
HAMD607598-HAMD607600	2

**Mufeed Hamed Supplemental Production - RFPDs Numbers Correlated to Bates Number
(September 9, 2014)**

Bates Range	RFPD Number
HAMD593051-HAMD593052	2
HAMD593065-HAMD593070	2
HAMD592922-HAMD592922	2
HAMD592977-HAMD592977	2
HAMD592981-HAMD592984	2
HAMD607566-HAMD607568	2
HAMD592933-HAMD592934	2
HAMD592957-HAMD592958	2
HAMD607585-HAMD607588	2
HAMD607601-HAMD607603	2
HAMD592924-HAMD592924	2
HAMD607572-HAMD607574	2
HAMD593029-HAMD593032	2
HAMD593017-HAMD593024	2
HAMD592969-HAMD592973	2
HAMD593005-HAMD593006	2
HAMD607620-HAMD607626	3
HAMD607627-HAMD607631	03, 06
HAMD607604-HAMD607619	03, 06, 08
HAMD607462-HAMD607463	4
HAMD607454-HAMD607455	4
HAMD607474-HAMD607495	4
HAMD607458-HAMD607459	4
HAMD607468-HAMD607469	4
HAMD607464-HAMD607465	4
HAMD607470-HAMD607471	4
HAMD607466-HAMD607467	4
HAMD607460-HAMD607461	4
HAMD607456-HAMD607457	4
HAMD607452-HAMD607453	4
HAMD607472-HAMD607473	4
HAMD607632-HAMD607699	06, 19
HAMD489526-HAMD489563	7
HAMD223604-HAMD223604	7
HAMD355301-HAMD355344	7
HAMD443026-HAMD443026	7
HAMD443024-HAMD443024	7
HAMD223584-HAMD223588--S2-0077	7
HAMD545683-HAMD545720	7
HAMD443027-HAMD443027	7
HAMD358329-HAMD358374	7
HAMD492688-HAMD492733	7
HAMD545553-HAMD545596	7
HAMD545597-HAMD545642	7
YUSF102074-YUSF102107	7
HAMD223599-HAMD223603	7
HAMD223589-HAMD223593	7

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Bates Range	RFPD Number
HAMD223579-HAMD223583	7
HAMD223573-HAMD223573	7
HAMD223574-HAMD223578	7
HAMD443025-HAMD443025	7
HAMD223568-HAMD223572	7
HAMD489440-HAMD489485	7
HAMD223594-HAMD223598	7
HAMD443022-HAMD443022	7
HAMD355391-HAMD355430	7
HAMD489486-HAMD489525	7
HAMD443029-HAMD443029	7
HAMD443030-HAMD443030	7
HAMD489363-HAMD489395	7
HAMD443023-HAMD443023	7
HAMD545643-HAMD545682	7
HAMD545520-HAMD545552	7
HAMD355431-HAMD355468	7
HAMD355268-HAMD355300	7
HAMD443028-HAMD443028	7
HAMD548996-HAMD549041	7
HAMD489396-HAMD489439	7
HAMD355345-HAMD355390	7
HAMD212728-HAMD212728	08, 13
HAMD591981-HAMD591981	08, 13
HAMD591982-HAMD591982	08, 13
HAMD212704-HAMD212704	08, 13
HAMD212657-HAMD212657	08, 13
HAMD212656-HAMD212656	08, 13
HAMD591980-HAMD591980	08, 13
HAMD595895-HAMD595895	9
HAMD593190-HAMD593191	9
YUSF101658-YUSF101658	9
YUSF106447-YUSF106447	9
YUSF101564-YUSF101564	9
HAMD227947-HAMD227947	09, 13
HAMD212702-HAMD212702	09, 13
HAMD595888-HAMD595888	09, 13
HAMD227924-HAMD227924	09, 13
HAMD227925-HAMD227925	09, 13
HAMD227956-HAMD227956	09, 13
HAMD227920-HAMD227920	09, 13
HAMD227957-HAMD227957	09, 13
HAMD428975-HAMD428975	09, 13
HAMD212533-HAMD212533	09, 13
HAMD595675-HAMD595675	09, 13
HAMD227958-HAMD227958	09, 13
HAMD227950-HAMD227951	09, 13

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Bates Range	RFPD Number
HAMD595885-HAMD595885	09, 13
HAMD211372-HAMD211372	09, 13
HAMD212003-HAMD212003	09, 13
HAMD212007-HAMD212007	09, 13
HAMD227954-HAMD227955	09, 13
HAMD212700-HAMD212700	09, 13
HAMD255290-HAMD255291	09, 13
HAMD213105-HAMD213106	09, 13
HAMD595676-HAMD595676	09, 13
HAMD227926-HAMD227926	09, 13
HAMD593179-HAMD593181	09, 13
HAMD227940-HAMD227940	09, 13
HAMD593177-HAMD593178	09, 13
HAMD213143-HAMD213143	09, 13
HAMD227949-HAMD227949	09, 13
HAMD213140-HAMD213140	09, 13
HAMD212906-HAMD212906	09, 13
HAMD227922-HAMD227922	09, 13
HAMD227917-HAMD227917	09, 13
HAMD211371-HAMD211371	09, 13
HAMD227919-HAMD227919	09, 13
HAMD227970-HAMD227970	09, 13
HAMD213152-HAMD213152	09, 13
HAMD227930-HAMD227930	09, 13
HAMD212701-HAMD212701	09, 13
HAMD211410-HAMD211410	09, 13
HAMD213139-HAMD213139	09, 13
HAMD211941-HAMD211941	09, 13
HAMD227929-HAMD227929	09, 13
HAMD211405-HAMD211406	09, 13
HAMD595891-HAMD595891	09, 13
HAMD212726-HAMD212726	09, 13
HAMD212712-HAMD212712	09, 13
HAMD227952-HAMD227952	09, 13
HAMD211375-HAMD211375	09, 13
HAMD213110-HAMD213110	09, 13
HAMD227943-HAMD227943	09, 13
HAMD593182-HAMD593185	09, 13
HAMD213148-HAMD213148	09, 13
HAMD595889-HAMD595889	09, 13
HAMD212727-HAMD212727	09, 13
HAMD227928-HAMD227928	09, 13
HAMD595886-HAMD595886	09, 13
HAMD213137-HAMD213137	09, 13
HAMD212711-HAMD212711	09, 13
HAMD211408-HAMD211408	09, 13
HAMD227953-HAMD227953	09, 13

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Bates Range	RFPD Number
HAMD212006-HAMD212006	09, 13
HAMD595897-HAMD595897	09, 13
HAMD227948-HAMD227948	09, 13
HAMD227946-HAMD227946	09, 13
HAMD212005-HAMD212005	09, 13
HAMD211403-HAMD211404	09, 13
HAMD211995-HAMD211995	09, 13
HAMD213129-HAMD213129	09, 13
HAMD211377-HAMD211377	09, 13
HAMD591984-HAMD591984	09, 13
HAMD227923-HAMD227923	09, 13
HAMD595672-HAMD595672	09, 13
HAMD212709-HAMD212709	09, 13
HAMD228006-HAMD228006	09, 13
HAMD213127-HAMD213127	09, 13
HAMD211998-HAMD211998	09, 13
HAMD213097-HAMD213097	09, 13
HAMD595671-HAMD595671	09, 13
HAMD227927-HAMD227927	09, 13
HAMD211939-HAMD211939	09, 13
HAMD227916-HAMD227916	09, 13
HAMD227969-HAMD227969	09, 13
HAMD213123-HAMD213123	09, 13
HAMD227931-HAMD227931	09, 13
HAMD213142-HAMD213142	09, 13
HAMD211373-HAMD211373	09, 13
HAMD211999-HAMD211999	09, 13
HAMD593188-HAMD593189	09, 13
HAMD227914-HAMD227914	09, 13
HAMD213136-HAMD213136	09, 13
HAMD227959-HAMD227959	09, 13
HAMD227921-HAMD227921	09, 13
HAMD211407-HAMD211407	09, 13
HAMD595674-HAMD595674	09, 13
HAMD213085-HAMD213085	09, 13
HAMD595883-HAMD595883	09, 13
HAMD212703-HAMD212703	09, 13
HAMD213107-HAMD213107	09, 13
HAMD213114-HAMD213114	09, 13
HAMD227937-HAMD227937	09, 13
HAMD213098-HAMD213098	09, 13
HAMD227918-HAMD227918	09, 13
HAMD227944-HAMD227944	09, 13
HAMD227941-HAMD227941	09, 13
HAMD227942-HAMD227942	09, 13
HAMD595673-HAMD595673	09, 13
HAMD211937-HAMD211937	09, 13

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Bates Range	RFPD Number
HAMD212710-HAMD212710	09, 13
HAMD211409-HAMD211409	09, 13
HAMD593186-HAMD593187	09, 13
HAMD595896-HAMD595896	09, 13
HAMD213128-HAMD213128	09, 13
HAMD595892-HAMD595892	09, 13
HAMD595887-HAMD595887	09, 13
HAMD595884-HAMD595884	09, 13
HAMD211997-HAMD211997	09, 13
HAMD213134-HAMD213134	09, 13
HAMD212002-HAMD212002	09, 13
HAMD212658-HAMD212658	09, 13
HAMD603645-HAMD604048	10, 11
HAMD261898-HAMD261898	12
HAMD591991-HAMD592006	12
HAMD563377-HAMD563378	12
HAMD202985-HAMD202985	12
HAMD200817-HAMD200817	12
HAMD562327-HAMD562327	12
HAMD589085-HAMD589085	12
HAMD200080-HAMD200080	12
HAMD583764-HAMD583764	12
HAMD595493-HAMD595493	12
HAMD589381-HAMD589381	12
HAMD597309-HAMD597309	12
HAMD595727-HAMD595727	12
HAMD605939-HAMD605939	12
HAMD200101-HAMD200101	12
HAMD595484-HAMD595484	12
HAMD563315-HAMD563315	12
HAMD200060-HAMD200061	12
HAMD200107-HAMD200107	12
HAMD200081-HAMD200084	12
HAMD562189-HAMD562189	12
HAMD200074-HAMD200074	12
HAMD200100-HAMD200100	12
HAMD202975-HAMD202976	12
HAMD203432-HAMD203432	12
HAMD200059-HAMD200059	12
HAMD588686-HAMD588686	12
HAMD599721-HAMD599721	12
HAMD610030-HAMD610030	12
HAMD200058-HAMD200058	12
HAMD243352-HAMD243352	12
HAMD603449-HAMD603449	12
HAMD243328-HAMD243328	12
HAMD603027-HAMD603027	12

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Bates Range	RFPD Number
HAMD592007-HAMD592007	12
HAMD591230-HAMD591230	12
HAMD601070-HAMD601070	12
HAMD583763-HAMD583763	12
HAMD589345-HAMD589345	12
HAMD589442-HAMD589442	12
HAMD200075-HAMD200075	12
HAMD592658-HAMD592658	13
HAMD212659-HAMD212659	13
HAMD592673-HAMD592673	13
HAMD594283-HAMD594283	13
HAMD592654-HAMD592654	13
HAMD200104-HAMD200104	13
HAMD428976-HAMD428976	13
HAMD592659-HAMD592659	13
HAMD212423-HAMD212423	13
HAMD212696-HAMD212696	13
HAMD592651-HAMD592651	13
HAMD211971-HAMD211971	13
HAMD200102-HAMD200102	13
HAMD212257-HAMD212257	13
HAMD213130-HAMD213130	13
HAMD211883-HAMD211886	13
HAMD213111-HAMD213111	13
HAMD213083-HAMD213083	13
HAMD592664-HAMD592664	13
HAMD594275-HAMD594275	13
HAMD592663-HAMD592663	13
HAMD262240-HAMD262240	13
HAMD211891-HAMD211891	13
HAMD592657-HAMD592657	13
HAMD594676-HAMD594676	13
HAMD211949-HAMD21194	13
HAMD592676-HAMD592676	13
HAMD592679-HAMD592679	13
HAMD211926-HAMD211926	13
HAMD592649-HAMD592650	13
HAMD211578-HAMD211578	13
HAMD592662-HAMD592662	13
HAMD213155-HAMD213155	13
HAMD592677-HAMD592678	13
HAMD213102-HAMD213102	13
HAMD212907-HAMD212907	13
HAMD592661-HAMD592661	13
HAMD592669-HAMD592669	13
HAMD592680-HAMD592680	13
HAMD212973-HAMD212974	13

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Bates Range	RFPD Number
HAMD592670-HAMD592671	13
HAMD592675-HAMD592675	13
HAMD212877-HAMD212877	13
HAMD212655-HAMD212655	13
HAMD592652-HAMD592653	13
HAMD213103-HAMD213103	13
HAMD212939-HAMD212939	13
HAMD595221-HAMD595221	13
HAMD200106-HAMD200106	13
HAMD212927-HAMD212928	13
HAMD592648-HAMD592648	13
HAMD592674-HAMD592674	13
HAMD212787-HAMD212787	13
HAMD212887-HAMD212891	13
HAMD200105-HAMD200105	13
HAMD212433-HAMD212433	13
HAMD592655-HAMD592656	13
HAMD212922-HAMD212922	13
HAMD212431-HAMD212431	13
HAMD592660-HAMD592660	13
HAMD583991-HAMD583991	13
HAMD592667R-HAMD592668R	13
HAMD211985-HAMD211985	13
HAMD580428-HAMD580431	13
HAMD592396-HAMD592397	13
HAMD609370-HAMD609379	17
HAMD609380-HAMD609394	17