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

MOHAMMAD HAMED,)	
) CIVIL NO. SX-14-CV-278	
Plaintiff,)	
V.) ACTION FOR DEBT	
) AND CONVERSION	
FATHI YUSUF,)	
•) JURY TRIAL DEMANDE	D
Defendant.)	
)	
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DEFENDANT'S INITIAL RULE 26(a)(1)(A) DISCLOSURES

Defendants Fathi Yusuf ("Defendant"), through his undersigned attorneys, Dudley, Topper and Feuerzeig, LLP, hereby provides his initial disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, applicable to these proceedings through Super. Ct. R. 7. These disclosures reflect information reasonably available to Defendant at this time. Defendant reserves the right to supplement these disclosures if additional or different information is obtained.

I. <u>Disclosures Under Fed. R. Civ. P. 26(a)(1)(A)(i)</u>.

The following individuals may have information used to support Defendant's defenses and counterclaims.

- 1. Mohammad Hamed.
- 2. Fathi Yusuf.
- 3. Waleed Hamed.
- 4. Nejeh Yusuf.
- 5. Hakima Salem.
- 6. Maher Yusuf.

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- 7. Hisham Hamed.
- 8. Waheed Hamed.
- 9. Mufeed Hamed.
- 10. Any and all witnesses who have been or will be disclosed or identified by Plaintiff in this case.
- 11. Any and all rebuttal and/or impeachment witnesses as they may become necessary.
- 12. All parties to the case, including their employees and agents.
- 13. Any witnesses named or listed or identified in discovery in *Hamed v. Yusuf* (SX-12-CV-370), or revealed in future discovery in that case or this case.
- 14. All witnesses to identify or authenticate documents or exhibits.

Defendant reserves the right to supplement these disclosures as litigation proceeds in this case.

II. Disclosures Under Fed. R. Civ. P. 26(a)(1)(A)(ii).

The following documents may be used to support Defendant's asserted claims or defenses:

1) Defendant incorporates by reference all documents produced or identified in Hamed v. Yusuf (SX-12-CV-370).

Defendant reserves the right to supplement these disclosures as litigation proceeds in this case.

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Defendant also notes that it may use any document produced by any other party in this case, whether in response to a request for production of documents, or in their Rule 26 disclosures, in support of his counterclaims and defenses.

III. Disclosures Under Fed. R. Civ. P. 26(a)(1)(A)(iii).

Computation of Damages: Professionals' fees and costs in this case. Additional damages based on counter-claims. Possible punitive damages, if applicable based on counter-claims. Investigation continues.

IV. Disclosures Under Fed. R. Civ. P. 26(a)(1)(A)(iv).

N/A.

Respectfully submitted,

DUDLEY, TOPPER AND FEUERZEIG, LLP

DATED: December 9, 2015

By:

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CERTIFICATE OF SERVICE

I hereby certify that on this day of December, 2015, I caused the foregoing **DEFENDANT'S INITIAL RULE** 26(A)(1)(A) **DISCLOSURES** to be served upon the following via e-mail and regular mail:

Joel H. Holt, Esq.

LAW OFFICES OF JOEL H. HOLT

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