

IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

FATHI YUSUF,

Plaintiff,

v.

PETER'S FARM INVESTMENT
CORPORATION, SIXTEEN PLUS
CORPORATION, MOHAMMAD A.
HAMED, WALEED M. HAMED,
WAHEED M. HAMED, MUFEED M.
HAMED, and HISHAM M. HAMED,

Defendants.

Case No.: ST-2015-CV-344

ACTION FOR DISSOLUTION
AND OTHER RELIEF

**DEFENDANT WALEED HAMED'S FIRST REQUEST
FOR INTERROGATORIES TO PLAINTIFF FATHI YUSUF**

WALEED M. HAMED, by undersigned counsel, propounds the following interrogatories pursuant to Rule 33 of the Federal Rules of Civil Procedure, as well as Local Rule 39 on the plaintiff Yusuf.

If any of the following Interrogatories cannot be answered in full, please answer to the extent possible, specify the reason for your inability to answer the remainder and state whatever information or knowledge you have concerning the unanswered portion.

Where your investigation is incomplete, give all information known as of the date of signing your answer. Where exact data is unavailable, supply estimated data, indicate that you have done so, and explain the basis on which the estimate was made.

If you decline to answer any interrogatory, or portion of any interrogatory, on a claim of privilege or other basis for withholding an answer, such as the work product doctrine, state each privilege or other basis for withholding claimed and describe in

detail all foundational facts upon which you base such claim of privilege or basis for withholding.

It is requested that all copies of all documents identified in response be attached to the answers to the responses to these Interrogatories as an exhibit.

The words "**and**," as well as "or," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the specifications all responses which might otherwise be construed to be outside its scope.

Terms in the plural include the singular and terms in the singular include the plural; the use of one gender shall include all others as appropriate in the context.

These interrogatories are continuing in nature so as to require **you, the Plaintiff**, to file supplemental answers if any additional or different information responsive to these interrogatories is discovered or obtained subsequent to the filing of answers to these interrogatories.

TERMS AND MEANINGS

The terms used in this Discovery have the following meaning:

"Document" is used in its broadest sense to include, by way of illustration only and not by way of limitation, all originals and non-identical copies of any writing or any other tangible thing or data compilation in the custody, possession or control of the Defendant - whether printed, typed, reproduced by any process, written or produced by hand, including any graphic matter however produced or reproduced, or produced by any other mechanical means and all data, either electronic, magnetic, chemical, mechanical, or other form of data storage capable of being transformed into written or oral matter, including, but not limited to, CO-ROMs, DVDs, computer disks, Hard-drive

computer storage mediums - including e-mails, letters, affidavits, filings, engineering studies and/or tests, reports, agreements, communications, correspondence, permits, accounting records, business records, contracts, letters of agreements, telegrams, mailgrams, memoranda, summaries and/or records of personnel or telephone conversations, diaries, calendars, forecasts, photographs, tape recordings, facsimiles, models, statistical statements, graphs, charts, plans, drawings, service and/or pump data, logs, minutes or records of meetings, minutes or records of conferences, reports and/or summaries of interviews, reports, conversations, summaries of investigations, opinions or reports of consultants, topographical or geological maps or surveys, appraisals, records, reports or summaries of negotiations, drafts of any document, revisions of drafts of any document, purchase orders, invoices, receipts, original or preliminary notes, financial statements, accounting work papers, promissory notes, film, microfilm, microfiche, punch cards, slides, pictures, videotapes, moving pictures, computer programs, laboratory results, magnetic tapes or any other matter which is capable of being read, heard or seen with or without mechanical or electronic assistance.

"Communication" means any correspondence, contact, discussion, exchange, contract, or agreement between any two or more persons. Without limiting the foregoing, "communication" includes all documents, as defined above, telephone conversations, internet communications, e-mail, facsimile transmissions, voice mail, face-to-face conversations, meetings, and conferences.

"Relevant time period" means 1995 to present.

"Peter's Farm" shall mean Peter's Farm Investment Corporation.

“Sixteen Plus” shall mean Sixteen Plus Corporation.

"Yusuf" shall mean plaintiff Fathi Yusuf.

INTERROGATORIES

1. Describe all claims you have or may have with regard to defendant for any type of relief sought in this lawsuit, including but not limited to money damages, and for each such claim, describe all factual bases and all documents or other evidence which support the claim(s).
2. Please provide the following for each piece of property owned by Peter's Farm Investment Corporation:
 - a) Description of the property;
 - b) The Island where the property is located;
 - c) Date property was purchased;
 - d) Purchase price paid;
 - e) Date property was sold (if applicable);
 - f) Number recorded in the Real Property Register for the Recorder of Deeds
3. Please provide the following for each piece of property owned by Sixteen Plus Corporation:
 - g) Description of the property;
 - h) The Island where the property is located;
 - i) Date property was purchased;
 - j) Purchase price paid;
 - k) Date property was sold (if applicable);
 - l) Number recorded in the Real Property Register for the Recorder of Deeds

4. Did Peter's Farm ever borrow funds to help secure the purchase of any property it has owned in the Virgin Islands and if so, please state for each such loan:
 - a) The name and location of the lender;
 - b) The property purchased with the loan proceeds;
 - c) The amount of the loan;
 - d) The date of the loan;
 - e) The date of all payments on the loan;
 - f) The current address and phone number of the lender;
 - g) The last date you had any communication with the lender; and
 - h) The balance on the loan

5. Did Sixteen Plus ever borrow funds to help secure the purchase of any property it has owned in the Virgin Islands and if so, please state for each such loan:
 - a) The name and location of the lender;
 - b) The property purchased with the loan proceeds;
 - c) The amount of the loan;
 - d) The date of the loan;
 - e) The date of all payments on the loan;
 - f) The current address and phone number of the lender;
 - g) The last date you had any communication with the lender; and
 - h) The current balance on the loan.

Dated: March 4, 2016



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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March, 2016, I served a copy of the foregoing Notice by email, as agreed by the parties, as well as by mail on:

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