

CERTIFICATE OF SERVICE

I hereby certify that this document complies with the page or word limitation set forth in Rule 6-1(e), and that on June 9, 2017, I caused a copy of the foregoing document to be served via email, as agreed by the parties, on:

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IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS

DIVISION OF ST. CROIX

WALEED HAMED and KAC357, INC.,)	
)	CIVIL NO. SX-16-CV-429
<i>Plaintiffs,</i>)	
v.)	
)	ACTION FOR DAMAGES
BANK OF NOVA SCOTIA,)	
d/b/a SCOTIABANK, FATHI YUSUF)	
MAHER YUSUF, YUSUF YUSUF and)	
UNITED CORPORATION,)	
)	
<i>Defendants.</i>)	JURY TRIAL DEMANDED
_____)	

PLAINTIFFS' RULE 26 INITIAL DISCLOSURES

Come now Waleed Hamed (Hamed) and KAC357, INC., by counsel, and hereby give notice of filing their Initial Disclosures pursuant to Rule 26(a)(1).

WITNESSES:

1. Waleed Hamed, Plaintiff, c/o Joel H. Holt—has knowledge of the facts related to the allegations in the complaint, including those giving rise to this case.
2. Fathi Yusuf, Defendant, c/o Greg Hodges—has knowledge of the facts related to the allegations in the complaint, including those giving rise to this case.
3. Maher Yusuf, Defendant, c/o Greg Hodges—has knowledge of the facts related to the allegations in the complaint, including those giving rise to this case.
4. Yusuf Yusuf, Defendant, c/o Greg Hodges—has knowledge of the facts related to the allegations in the complaint, including those giving rise to this case.
5. Nizar DeWood, c/ 4200 Montrose Blvd, Suite 540, Houston, TX 77006 —has knowledge of the facts related to the allegations in the complaint, including those giving rise to this case.
6. Yvette Clendenen, c/o Charles Lockwood—has knowledge of Maher and Yusuf Yusuf's visits following the withdrawal of \$400,000 from the Plessen Enterprises, Inc. Scotiabank account.

7. Karen Stair, c/o Charles Lockwood—has knowledge of the Plessen Enterprises, Inc. Scotiabank account and documents relating to that account.
8. Derrick Martin, Bank Manager, c/o Charles Lockwood—has knowledge of the Plessen Enterprises, Inc. Scotiabank account and documents relating to that account.
9. Carolyn Cole, Senior Account Manager, c/o Charles Lockwood—has knowledge of the Plessen Enterprises, Inc. Scotiabank account and signature cards relating to that account.
10. Virgin Islands Police Department (VIPD) Officer Sergeant Mark Cornerio, c/o VIPD, has knowledge of the Virgin Islands Police Department's investigation into the alleged embezzlement of \$400,000 from the Plessen Enterprises, Inc. Scotiabank account.

DOCUMENTS:

See Exhibit A for a listing of documents provided. Documents are grouped according to the following three categories:

- Documents produced pursuant to the VI criminal case, *People of the Virgin Islands v. Waleed Hamed and Mufeed Hamed* SX-15-CR-352 and SX-15-CR-353
- Plessen Enterprises, Inc. bank documents produced by Karen Stair, Scotiabank
- Plessen Enterprises, Inc. corporate documents

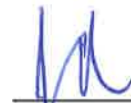
INSURANCE:

None

DAMAGES:

As set forth in ad damnum averments of the Complaint.

Dated: June 9, 2017.



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Exhibit A

**Plaintiffs' Rule 26 Initial Document
Disclosure List of Bates Numbers**

Plessen Enterprises, Inc. corporate documents

<u>Bates Range</u>	<u>Bates Range</u>
FBIX210733-FBIX210772	HAMD214681-HAMD214682
FBIX210779-FBIX210784	HAMD214683-HAMD214684
FBIX234782-FBIX234787	HAMD214685-HAMD214686
FBIX234788-FBIX234791	HAMD214688-HAMD214690
FBIX234792-FBIX234795	HAMD214693-HAMD214693
FBIX234796-FBIX234800	HAMD214695-HAMD214704
FBIX234801-FBIX234805	HAMD214706-HAMD214708
FBIX234806-FBIX234808	HAMD214710-HAMD214714
FBIX234809-FBIX234810	HAMD214716-HAMD214726
FBIX234811-FBIX234813	HAMD214728-HAMD214741
FBIX234814-FBIX234818	HAMD214742-HAMD214773
FBIX234819-FBIX234825	HAMD214781-HAMD214781
FBIX234826-FBIX234827	HAMD214782-HAMD214799
FBIX234828-FBIX234829	HAMD214811-HAMD214813
FBIX234830-FBIX234832	HAMD214814-HAMD214814
FBIX234833-FBIX234834	HAMD214815-HAMD214815
FBIX234835-FBIX234837	HAMD214816-HAMD214817
FBIX234838-FBIX234841	HAMD214818-HAMD214820
FBIX234842-FBIX234851	HAMD214828-HAMD214832
FBIX234856-FBIX234859	HAMD214833-HAMD214837
FBIX234860-FBIX234863	HAMD214869-HAMD214876
FBIX240947-FBIX241017	HAMD214883-HAMD214957
FBIX252487-FBIX252499	HAMD214958-HAMD215021
FBIX254453-FBIX254507	HAMD215055-HAMD215074
FBIX255226-FBIX255227	HAMD215207-HAMD215267
FBIX256003-FBIX256008	HAMD225395-HAMD225395
FBIX257026-FBIX257047	HAMD225396-HAMD225396
FBIX257048-FBIX257068	HAMD225398-HAMD225398
FBIX257085-FBIX257102	HAMD225406-HAMD225406
FBIX257122-FBIX257141	HAMD225415-HAMD225430
FBIX257142-FBIX257159	HAMD225431-HAMD225446
FBIX257160-FBIX257166	HAMD225491-HAMD225508
FBIX257190-FBIX257194	HAMD225541-HAMD225541
FBIX257195-FBIX257204	HAMD225560-HAMD225563
FBIX257205-FBIX257211	HAMD225564-HAMD225569
FBIX257212-FBIX257215	HAMD225570-HAMD225580
FBIX257218-FBIX257220	HAMD225581-HAMD225583
FBIX257221-FBIX257222	HAMD225586-HAMD225586
FBIX257238-FBIX257241	HAMD225587-HAMD225588
HAMD205557-HAMD205567	HAMD225589-HAMD225593
HAMD214653-HAMD214654	HAMD225594-HAMD225597
HAMD214659-HAMD214660	HAMD225598-HAMD225601
HAMD214662-HAMD214666	HAMD225614-HAMD225615
HAMD214669-HAMD214669	HAMD225618-HAMD225619

**Plessen Enterprises, Inc.
corporate documents (con't)**

<u>Bates Range</u>	<u>Bates Range</u>
HAMD225622-HAMD225625	HAMD226440-HAMD226441
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HAMD225666-HAMD225668	HAMD226457-HAMD22645
HAMD225675-HAMD225679	HAMD226460-HAMD226462
HAMD225685-HAMD225687	HAMD226704-HAMD226707
HAMD225688-HAMD225692	HAMD226723-HAMD226723
HAMD225698-HAMD225702	HAMD226858-HAMD226859
HAMD225703-HAMD225704	HAMD226870-HAMD226876
HAMD225705-HAMD225705	HAMD226963-HAMD226978
HAMD225732-HAMD225735	HAMD227421-HAMD227429
HAMD225740-HAMD225750	HAMD227502-HAMD227503
HAMD225751-HAMD225751	HAMD241818-HAMD241819
HAMD225752-HAMD225756	HAMD242785-HAMD242788
HAMD225759-HAMD225766	HAMD268851-HAMD268861
HAMD225787-HAMD225793	HAMD268870-HAMD268877
HAMD225798-HAMD225803	HAMD277434-HAMD277468
HAMD225810-HAMD225812	HAMD298925-HAMD298925
HAMD225813-HAMD225815	HAMD342354-HAMD342404
HAMD225846-HAMD225863	HAMD362529-HAMD362748
HAMD225879-HAMD225880	HAMD429777-HAMD429777
HAMD225898-HAMD225907	HAMD429781-HAMD429787
HAMD225908-HAMD225908	HAMD429813-HAMD429828
HAMD225909-HAMD225910	HAMD429853-HAMD429854
HAMD225912-HAMD225934	HAMD429911-HAMD429912
HAMD225935-HAMD225943	HAMD429914-HAMD429915
HAMD225953-HAMD225969	HAMD429916-HAMD429920
HAMD226010-HAMD226027	HAMD430003-HAMD430003
HAMD226043-HAMD226047	HAMD430012-HAMD430016
HAMD226058-HAMD226069	HAMD430038-HAMD430041
HAMD226070-HAMD226072	HAMD430062-HAMD430066
HAMD226073-HAMD22607	HAMD430075-HAMD430079
HAMD226075-HAMD226077	HAMD430160-HAMD430166
HAMD226078-HAMD226082	HAMD430168-HAMD430168
HAMD226083-HAMD226099	HAMD430180-HAMD430185
HAMD226100-HAMD226101	HAMD430210-HAMD430227
HAMD226102-HAMD226103	HAMD430263-HAMD430279
HAMD226125-HAMD226126	HAMD430294-HAMD430316
HAMD226129-HAMD226130	HAMD430326-HAMD430332
HAMD226383-HAMD226400	HAMD430364-HAMD430368
HAMD226401-HAMD226416	HAMD430482-HAMD430483
HAMD226417-HAMD226432	HAMD430490-HAMD430491
HAMD226433-HAMD226435	HAMD430507-HAMD430508
HAMD226436-HAMD226437	HAMD430509-HAMD430510

**Plessen Enterprises, Inc.
corporate documents (con't)**

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HAMD430741-HAMD430741	HAMD596269-HAMD596270
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HAMD430839-HAMD430841	HAMD596300-HAMD596300
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Plessen Enterprises, Inc.	
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