

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

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff/Counterclaim Defendant,

vs.

FATHI YUSUF and **UNITED CORPORATION**

Defendants and Counterclaimants.

vs.

**WALEED HAMED, WAHEED HAMED,
MUFEED HAMED, HISHAM HAMED, and
PLESSEN ENTERPRISES, INC.,**

Counterclaim Defendants,

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff,

vs.

UNITED CORPORATION,

Defendant.

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

Case No.: SX-2012-cv-370

**ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

JURY TRIAL DEMANDED

Consolidated with

Case No.: SX-2014-CV-287

**ACTION FOR DECLARATORY
JUDGMENT**

JURY TRIAL DEMANDED

Consolidated with

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

**HAMED'S REQUESTS FOR THE PRODUCTION OF DOCUMENTS PURSUANT
TO THE CLAIMS DISCOVERY PLAN OF 1/29/2018, NOS. 1-5 OF 50 -- AS TO:**

**H-21 - PAYMENT OF NEJEH YUSUF CREDIT CARD BILL,
H-33 - MERRILL ACCOUNTS FINANCED WITH PARTNERSHIP FUNDS,
H-149 - SEASIDE MARKET & DELI, LLC.,
H-151 - CHECKS WRITTEN TO FATHI YUSUF FOR PERSONAL USE AND
H-162 - CLAIMS BASED ON MONITORING REPORTS/ACCOUNTING**

Request for the Production of Documents 1 of 50:

RFPD number 1 of 50 relates to Claim H-21 (previously identified as 281) – described in the claims list as "Payment of NejeH Yusuf credit card bill."

Please provide all documents relating to or substantiating the \$49,715.05 in charges attributed to NejeH Yusuf on the Bank of America credit card statement (5474 1500 8271 1556), including, but not limited to, credit card statements and invoices substantiating the charges -- and the Partnership business purpose therefore. See Exhibit 281, Exhibits to JVZ Engagement Report, September 28, 2016, bates numbers JVZ-001252-JVZ-001253.

Response:

Request for the Production of Documents 2 of 50:

RFPDs number 2 of 50 relates to Claim H-33 (previously identified as 338) – described in the claims list as "Merrill Lynch accounts that still existed in 2012 (ML-140-21722, ML-140-07884 and ML-140-07951) financed with Partnership funds."

Please provide all documents related to the following Merrill Lynch accounts from 9/17/2006 through the present: ML 140-21722, ML 140-07884 and ML 140-07951. Documents should include, but not be limited to, documents identifying the origins of the deposits into each Merrill Lynch account and the Merrill Lynch statements.

Response:

Request for the Production of Documents 3 of 50:

RFPD 3 of 50 relates to Claim H-149 (previously identified as 246, 255, 260, 318) – described in the claims list as “Seaside Market & Deli LLC.”

Please provide all documents related to transactions between the Partnership, United or the Plaza Extra Stores and the Seaside Market & Deli. These documents should include, but not be limited to, invoices, description of inventory sold to Seaside, pricing of inventory sold to Seaside, shipping invoices for the goods shipped to Seaside, and general ledger entries documenting the Plaza Extra, United and Seaside transactions. These documents should be provided up to the date of the transfer of the East and West stores on March 9, 2015.

Response:

Request for the Production of Documents 4 of 50:

RFPD 4 of 50 relates to Claim H-151 (previously identified as 3004a) – described in the claims list as “Checks written to Fathi Yusuf for personal use.”

For all of the Partnership bank accounts, please provide all bank statements reflecting checks written to Fathi Yusuf, the United Corporation, as well as the cancelled checks, from 9/17/2006 to present.

Response:

Request for the Production of Documents 5 of 50:

RFPD 5 of 50 relates to Claim H-162 (previously identified as Exhibit A-L) – described in the claims list as “Claims based on monitoring reports/accounting 2007-2012).”

Please provide all documents to and/or from the United States or the United States Virgin Islands government or monitors from 9/17/2006 to present related to monitoring or monitoring reports prepared in connection with the *US v United et. al*, criminal case, 2005-15 (D.V.I.).

Response:

Dated: January 30, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of January, 2018, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

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Carl J. Hamed

CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

This document complies with the page or word limitation set forth in Rule 6-1(e).



Carl J. Hamed