

**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.

Case No.: SX-2012-cv-370

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

JURY TRIAL DEMANDED

Consolidated with

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

Plaintiff,

vs.

UNITED CORPORATION,

Defendant.

Case No.: SX-2014-CV-287

**ACTION FOR DECLARATORY
JUDGMENT**

JURY TRIAL DEMANDED

Consolidated with

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

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

**HAMED'S THIRD INTERROGATORIES PER THE CLAIMS DISCOVERY PLAN
OF 1/29/2018, NOS. 14-15 OF 50 AS TO Y-6, BLACK BOOK BALANCE
OWED UNITED, AND Y-7 LEDGER BALANCES OWED UNITED**

Pursuant to the stipulated Joint Discovery Plan, as ordered by the Special Master on January 29, 2018, Hamed propounds the following Third Claims interrogatories relating to the claims listed below.

Interrogatory 14 of 50:

Interrogatory 14 of 50 relates to Claim Y-6 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Black Book Balances Owed United” and Exhibit G to Yusuf’s Original Claims, Relevant Black Book Entries.

Please fully describe Exhibit G – Relevant Black Book Entries, including but not limited to, the physical location of where this “Black Book” was when it was found, who first found this “Black Book,” the total number of pages in this “Black Book,” how this “Black Book” made it to its physical location, when the “Black Book” was placed in the location where it was found, whether the FBI ever had possession of this “Black Book”, and if so for what dates, an explanation of each entry in Exhibit G, including, but not limited to, what the designation “ck #” signifies, including the bank account associated with the entry; **the date of the transaction for each entry (including the year)**; a description of each expenditure/description (*e.g.*, p. 2, what does “Less Fathi Yusuf \$2,500.00 mean”), an explanation of why each entry is a business expense of the Partnership, a description of the documents supporting each expenditure/description (*e.g.*, an invoice), a translation of each Arabic word/phrase/description in the exhibit, and the length of time that passed between each entry and the date the FBI seized the document -- with a description of all bank, investment and other documents referenced in the exhibit or your explanation.

Interrogatory 15 of 50:

Interrogatory 15 of 50 relates to Claim Y-7 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Ledger Balances Owed United” and Exhibit H to Yusuf’s Original Claims, Ledger Sheets Reflecting United’s Payments for Plaza Extra.

Please fully describe Exhibit H “Ledger Sheets Reflecting United’s Payments for Plaza Extra,” including, but not limited to, the physical location where this ledger sheet was found, who first found this ledger sheet, how this ledger sheet made it to its physical location, when the ledger sheet was placed in the location where it was found, whether the FBI ever had possession of this ledger sheet and if so, the dates of that possession, whether the ledger sheet is part of a larger document, and if so, the total number of pages in the larger document, an explanation of each entry on the ledger sheet, including, but not limited to, **the date of each transaction reflected in each entry (including the year)**, a description of each entry (*e.g.*, what is the name of the person the bedroom set in 1998 was purchased for), an explanation of why each entry is a business expense of the Partnership, and a description of the documents supporting each expenditure description (*e.g.*, an invoice). Also, for each such entry, state the length of time that passed between each entry and the date the FBI seized the document -- with a description of all bank, investment and other documents referenced in the exhibit or your explanation.

Dated: February 9, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of February, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

Hon. Edgar Ross
Special Master
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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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



VERIFICATION

I hereby certify under penalty of perjury that the facts contained in each of the foregoing responses to interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: _____, _____, 2018

_____ Attesting Individual

TERRITORY OF THE UNITED STATES VIRGIN ISLANDS

DISTRICT OF _____) ss.

On this, the _____ day of _____, 2018, before me, the undersigned officer, personally appeared the signor known to me (or satisfactorily proven to be) the person whose name is subscribed to the within document and acknowledged that he/she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

_____ Notary Public