

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

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

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.

Comes, now, the Plaintiff, by counsel, and hereby gives Notice of service of the following discovery documents pursuant to the claims discovery plan of January 29, 2018:

1) Hamed's Third Requests to Admit, Nos. 7-29 of 50:

- Y-3: Interest on bay rent already awarded,
- Y-4: Interest on bays 5 & 8,
- Y-5: Reimburse United's gross receipt taxes, H-150 and H-160: United's gross receipt taxes, H-152: United's corporate franchise tax and annual fees and H-153: United's property insurance,
- H-15: NejeH Yusuf's cash withdrawals from safe
- H-16: NejeH Yusuf's use of partnership resources for his private business on STT,
- H-22: NejeH Yusuf removed property belonging to KAC 357, INC.,
- H-26: Inventory moved from plaza west to east after official inventory,
- H-27: BJ's wholesale club vendor credit,
- H-30: KAC357, INC. payment of partnership AT&T invoices,
- H-31: Point of sale transactions,
- H-32: No credit for expired (spoiled) inventory,
- H-35: KAC357, INC.'s American Express payments deposited to partnership account,
- H-39: STT Tutu gift certificates,
- H-40: Approximately \$18 million in 2013 "purged" transactions,
- H-142: Half acre in Estate Tutu,
- H-146: Imbalance in credit card points,
- H-147: Vendor rebates,
- H-148: Excessive travel and entertainment expenses, and
- H-163: Loss of assets due to wrongful dissolution – attorney's fees

2) Hamed's Fourth Interrogatories, Nos. 16-28 of 50:


- Y-5: Reimburse United for gross receipt taxes, H-150 and H-160: United's gross receipts taxes, H-152: United's corporate franchise taxes and fees and H-153: Partnership funds used to pay United's property insurance,
- H-7: KAC357, INC. payment of invoices from J. David Jackson, PC and H-8: David Jackson, CPA, bill owed for tax work done related to the partnership's 2013 taxes,
- H-15: NejeH Yusuf's cash withdrawals from safe,
- H-17: Wally hamed's personal payment of accounting and attorneys' fees in *US V UNITED CORP.*, VI D.Ct. 2005-cr-015,
- H-22: NejeH Yusuf removed property belonging to KAC357, INC.,
- H-142: Half acre in Estate Tutu,
- H-146: imbalance in credit card points,
- H-147: Vendor rebates,
- H-154: Attorney and accounting fees paid by the partnership for the criminal case,

- H-163: Loss of assets due to wrongful dissolution—attorney’s fees,
- H-164: Inventory adjusted downward by \$1,660,000 due to unrecorded inventory transfers to other stores, and
- H-165: Debts totaling \$176,267.97

3) Hamed’s Third Request for the Production of Documents 8-18 of 50:

- H-20: KAC357, INC. payment of Tropical Shipping Invoices,
- H-26: inventory moved from Plaza West to East after completion of official inventory,
- H-27: BJ’S Wholesale Club Vendor Credit,
- H-36: Unclear UVI payment,
- H-141: Unclear general ledger entry “due t/fr settlement re stmt at 9/30/15,”
- H-142: half acre in Estate Tutu,
- H-148: Excessive travel and entertainment expenses,
- H-157: Unclear general ledger entry regarding “Fathi Yusuf refund of overpayment,”
- H-159: Unclear general ledger entries indicating accounts payable trade payments to United Corporation in 2015,
- H-166: Entry for Tutu Park LTD for \$30,359.38, and
- H-167: Checks to Daytona Beach Market & Deli

Dated: February 21, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of February, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

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Handwritten signature of Carl J. Harbo in blue ink, positioned above a horizontal line.

CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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



Handwritten signature of Carl J. Harbo in blue ink, positioned above a horizontal line.