**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

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| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2012-cv-370** |
| *Plaintiff/Counterclaim Defendant*, |  |
| vs.  **FATHI YUSUF** and **UNITED CORPORATION** | **ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF** |
|  |  |
| *Defendants and Counterclaimants,*  vs.  **WALEED HAMED, WAHEED** **HAMED, MUFEED HAMED, HISHAM HAMED,** **and PLESSEN ENTERPRISES, INC.**,  *Counterclaim Defendants.* | JURY TRIAL DEMANDED |
|  | Consolidated with |
| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2014-CV-287** |
|  |  |
| *Plaintiff*,  vs. | **ACTION FOR DECLARATORY**  **JUDGMENT** |
| **UNITED CORPORATION,** | JURY TRIAL DEMANDED |
| *Defendant.*  *­­­­­­*­­  **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED,  *Plaintiff,*  vs.  **FATHI YUSUF**,  *Defendant.* | Consolidated with  **Case No.: SX-2014-CV-278**  **ACTION FOR DEBT AND CONVERSION**  JURY TRIAL DEMANDED |
|  |  |

**PLAINTIFF HAMED’S NOTICE OF SERVING DISCOVERY**

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

1. **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

1. **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:

**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).

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