

**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

**H-1: REIMBURSEMENT FOR SALE OF THE DORTHEA CONDO
Y-10: PAST PSHIP WITHDRAWALS – RECEIPTS**

Request to Admit 30 of 50:

Request to admit number 30 of 50 relates to Claim H-1 (old Claim No. 201) – as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Reimbursement for sale of the Dortehea condo."

Admit or Deny that on September 30, 2016, in *Yusuf's Accounting Claims and Proposed Distribution Plan*, p. 3, as filed with the Court, Defendants acknowledged, as follows, in writing: a "balance of \$802,966.00 due to Hamed" -- and that such acknowledgement was made after September 17, 2006.

b) an accounting of funds received by Yusuf for the sale of Y&S Corporation ("Y&S") and R&F Condominium, Inc. ("R&F") stock **resulting in a balance of \$802,966.00 due to Hamed** . . .(Emphasis added.)

Response:

Request to Admit 31 of 50:

Request to Admit number 31 of 50 relates to Claim Y-10, as described in Hamed's November 16, 2017 Motion for a Hearing Before Special as "Past Pship Withdrawals – Receipts."

Admit or Deny that on July 1, 2011 Fathi Yusuf and Fawzia Yusuf, under notarized signatures, each signed a letter acknowledging a gift to Hisham Hamed that stated "I expect no repayment of this gift" and was funded by monies Yusuf obtained from the Plaza Extra Stores:

This correspondence will acknowledge and memorialize my conveyance today of a **gift** in the amount of \$750,000 to you.

I am giving you the unrestricted right to the immediate use of this money for whatever purpose you desire. **I expect no repayment of this gift from me**, whether in the form of cash, property, or future services. (Emphasis added.)

Response:

Request to Admit 32 of 50:

Request to Admit number 32 of 50 relates to Claim Y-10, as described in Hamed's November 16, 2017 Motion for a Hearing Before Special as "Past Pship Withdrawals – Receipts."

Admit or Deny that on July 1, 2011 Fathi Yusuf and Fawzia Yusuf, under notarized signatures, each signed a \$750,000 gift letter to Mufeed Hamed that stated "I expect no repayment of this gift" and was funded by monies Yusuf obtained from the Plaza Extra Stores:

I am giving you the unrestricted right to the immediate use of this money for whatever purpose you desire. **I expect no repayment of this gift from me**, whether in the form of cash, property, or future services.

Response:

Dated: February 25, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

Hon. Edgar Ross

Special Master
% edgarrossjudge@hotmail.com

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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).

