

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

WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,	)	
	)	
Plaintiff/Counterclaim Defendant,	)	CIVIL NO. SX-12-CV-370
v.	)	
FATHI YUSUF and UNITED CORPORATION,	)	ACTION FOR INJUNCTIVE RELIEF, DECLARATORY JUDGMENT, AND
Defendants/Counterclaimants,	)	PARTNERSHIP DISSOLUTION, WIND UP, AND ACCOUNTING
v.	)	
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,	)	
	)	
<u>Additional Counterclaim Defendants.</u>	)	Consolidated With
	)	
WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,	)	
	)	CIVIL NO. SX-14-CV-287
Plaintiff,	)	
v.	)	ACTION FOR DAMAGES AND DECLARATORY JUDGMENT
UNITED CORPORATION,	)	
	)	
<u>Defendant.</u>	)	
	)	
WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,	)	CIVIL NO. SX-14-CV-278
	)	
Plaintiff,	)	ACTION FOR DEBT AND CONVERSION
v.	)	
FATHI YUSUF,	)	
	)	
<u>Defendant.</u>	)	

**JOINT STIPULATION AS TO STAY OF DISCOVERY RESPONSES FROM YUSUF  
AND REQUEST FOR EXPEDITED DETERMINATION BY THE MASTER**

Waleed Hamed, as Executor of the Estate of Mohammad Hamed (“Hamed”), and Fathi  
Yusuf (“Yusuf”) through their undersigned counsel, hereby stipulate as follows:

1. Hamed served his First Set of Interrogatories, Requests for Production and Requests to Admit upon Yusuf (collectively "Hamed's First Set of Discovery"), consisting of:
  - A. Hamed's First Set of Interrogatories: 1 of 50;
  - B. Hamed's First Request to Admit: 1-3; and,
  - C. Hamed's First Request for Production of Documents: 1-5.
2. Yusuf timely responded to Hamed's First Set of Discovery and posed certain objections.
3. Hamed sent Yusuf a letter seeking a "meet and confer". Counsel conferred and determined that the objections raised would likely be raised in subsequent discovery, and that direction and clarification was needed from the Master.
4. In order to allow the Master an opportunity to provide clarity as to the upcoming discovery issues, counsel for Hamed and Yusuf hereby stipulate to stay the filing of all responses due from Yusuf to all the written discovery from Hamed until May 1, 2018.
5. Hamed will file a *motion to compel* as to the requests to admit -- both the opposition and the reply will be filed within 15 day periods. **The parties respectfully request that the Master expedite the decision on this motion.**
6. The Stay does not affect the requirement that all written discovery be propounded by March 31, 2018.
7. Counsel for Hamed has agreed to have this Joint Stipulation filed by counsel for Yusuf.


So Stipulated, this the 22<sup>nd</sup> day of March, 2018.

DATED: March 22<sup>nd</sup>, 2018

By: Carl Hartmann with express  
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Permission by  
Charter K. Perce

DATED: March 23<sup>rd</sup> 2018

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Attorneys for Fathi Yusuf and United Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of March, 2018, I caused the foregoing JOINT STIPULATION AS TO STAY OF DISCOVERY RESPONSES FROM YUSUF AND REQUEST FOR EXPEDITED DETERMINATION BY THE MASTER which complies with the page or word limitation set forth in Rule 6-1(e), to be served upon the following via the Case Anywhere docketing system:

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