

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

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

*Plaintiff,*

vs.

**UNITED CORPORATION,**

*Defendant.*

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

*Plaintiff,*

vs.

**FATHI YUSUF,**

*Defendant.*

Pursuant to the stipulated Joint Discovery Plan, as ordered by the Special Master on January 29, 2018, Hamed propounds the following sixth set of interrogatories.

**Interrogatory 33 of 50:**

**Substantially the Same as Yusuf ROG 1.** Please identify any and all assets including bank accounts (indicating account number and name of bank), brokerage accounts, real estate, interests in business ventures and other financial interests, foreign and domestic, owned by each of the following Yusuf family members: 1) Fathi, 2) Mike, 3) Nejeh, and 4) Yusuf Yusuf *from September 17, 2006 to the date of your response* and identify the source of all funds for the acquisition of such assets.

**Response:**

**Interrogatory 34 of 50:**

**Substantially the Same as Yusuf ROG 2.** Please identify each and every asset and interest, foreign and domestic, owned by Fathi Yusuf or any corporation more than 49% owned by him *from September 1, 2012 to the date of this response* -- and the source of the income (including any loan proceeds) which provided the asset as well as any disposition of the asset since that time.

**Response:**

**Interrogatory 35 of 50:**

**Substantially the Same as Yusuf ROG 3.** Please identify all sources of income for 1) Fathi, 2) Mike, 3) NejeH, and 4) Yusuf Yusuf *from September 17, 2006 to the date of your response* and identify the source of all funds for the acquisition of such assets.

**Response:**

**Interrogatory 36 of 50:**

**Substantially the Same as Yusuf ROG 4.** Please describe who selected counsel to represent the Yusuf defendants in the Criminal Case, who paid each counsel, what amount each counsel was paid, how each counsel was paid, and the source of funds for each payment?

**Response:**

**Interrogatory 37 of 50:**

**Substantially the Same as Yusuf ROG 6.** Identify all distributions from the Partnership to any member of the Yusuf family or United Corporation from September 17, 2006 to present?

**Interrogatory 38 of 50:**

**Like Yusuf ROG 14.** Identify all assets or amounts in excess of \$10,000 that were transferred to or from Fathi Yusuf or United Corporation from September 17, 2012 to date and what was the value of said assets upon transfer?

**Interrogatory 39 of 50:**

**Like Yusuf ROG 15.** What assets were held by Fathi Yusuf and United Corporation as of the date of death of Mohammad Hamed?



**Interrogatory 40 of 50:**

**Substantially the Same as ROG 17.** Has any member of the Yusuf family held assets for the benefit of Fathi Yusuf and, if so, please identify any such assets and their value as of September 17, 2006, September 1, 2012, and at present, as well as any disposition of such assets?

**Interrogatory 41 of 50:**

**Substantially the Same as Yusuf ROG 19:** Identify all facts and circumstances relating to Yusuf Claims No. 2-5 and 10-12, and identify, all documents relating to each claim.

- Y-02** Unpaid rent for Plaza Extra-East Bays 5 & 8
- Y-03** 9% interest on rent claims for Bay 1
- Y-04** 9% interest on rent claims for Bays 5 & 8
- Y-05** Reimburse United for Gross Receipt Taxes  
\* \* \* \*
- Y-10** Past Partnership Withdrawals - Receipts
- Y-11** Lifestyle Analysis
- Y-12** Foreign Accts and Jordanian Properties

**Dated:** March 24, 2018



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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of March, 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).



**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