

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.

**HAMED'S FIFTH REQUEST
FOR THE PRODUCTION OF DOCUMENTS 28-36 OF 50
TO YUSUF PURSUANT TO THE CLAIMS DISCOVERY PLAN OF 1/29/2018**

References to "Exhibits" are to the Exhibits to Yusuf's First Set Of Discovery served on Hamed on March 23, 2018.

RFPDs 28 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 2. Please produce any and all financial statements or applications for financing for United, as well as Fathi, Mike, Negeh and Yusuf Yusuf or any company controlled more than 49%, submitted to any person or institution from September 17, 2006 to present.

Response:

RFPDs 29 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 4. Please produce copies of any accountings prepared by or on behalf of United or any member of the Hamed or Yusuf families in the Criminal Case to demonstrate the Partnership's or United's income.

Response:

RFPDs 30 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 5. Please produce copies of all original tax returns filed by United, Fathi, Mike, Negeh and Yusuf Yusuf from 1986 to date.

Response:

RFPDs 31 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 6. Please produce copies of all documents including statements relating to any operating, savings, credit, investment, trust, escrow or other accounts in which United, Fathi, Mike, NejeH and Yusuf Yusuf or any company which they have more than 49% control, have or had any interest in the Virgin Islands or elsewhere, including, but not limited to Jordan and West Bank, Palestine, from 1986 to date.

Response:

RFPDs 32 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 7. Please produce all documents relating to all assets of United, Fathi, Mike, NejeH and Yusuf Yusuf as of September 12, 2012 and the value of such assets.

Response:

RFPDs 33 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 8. For any allocation set forth in Exhibits 1-5, please produce all underlying documents relating to any such allocation.

Response:

RFPDs 34 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 9. Please produce all documents relating to your claim that rent is due from the Partnership to occupying Bay 5 and Bay 8.

Response:

RFPDs 35 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 10. For any debts Yusuf claims are owed by the Partnership in Exhibit 6, please provide any documents or supporting evidence which supports these debts of the Partnership.

Response:

RFPDs 36 of 50:

SUBSTANTIALLY THE SAME AS YUSUF RFPD 11. As to the accounts of Fathi, Mike, Nejeah and Yusuf Yusuf, please produce copies of any and all bank or investment account statements for the period from September 17, 2006 to date.

Response:

Dated: March 25, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of March, 2018, I served a copy of the foregoing by email (CaseAnywhere ECF), 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).


