

**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.*

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**HAMED'S SIXTH REQUEST  
FOR THE PRODUCTION OF DOCUMENTS 37-47 OF 50  
TO YUSUF PURSUANT TO THE CLAIMS DISCOVERY PLAN OF 1/29/2018**

**RFPD 37 of 50:**

Please produce any and all documents relating to gifts given by Fathi Yusuf (and/or is wife) to Mafi Hamed and Shawn Hamed and/or their spouses at the time of their weddings to Yusuf daughters.

**Response:**

**RFPD 38 of 50:**

Please produce any and all documents relating to gifts given by United Corporation to Mafi Hamed and Shawn Hamed and/or their spouses at the time of their weddings to Yusuf daughters.

**Response:**

**RFPD 39 of 50:**

Please produce any and all documents relating to gifts given by the Plaza Extra Corporation to Mafi Hamed and Shawn Hamed and/or their spouses at the time of their weddings to Yusuf daughters.

**Response:**

**RFPD 40 of 50:**

Please produce any and all documents relating to gifts to Mafi Hamed and Shawn Hamed and/or their spouses at the time of their weddings to Yusuf daughters as to Fathi Yusuf or his spouse or his daughters seeking return, credit or offset in divorce proceedings.

**Response:**

**RFPD 41 of 50:**

Please produce any and all documents identified in or relating to your responses to Hamed's Interrogatories 42-48 of 50.

**Response:**

**RFPD 42 of 50:**

Please produce any and all documents identified in or relating to your responses to Hamed's RTAs 46-48 of 50.

**Response:**

RFPD's 44-47 relate to the events and actions of Fathi Yusuf averred in his and United's testimony and filings as follows: (1) in Yusuf's March 4, 2013 *Proposed Findings of Fact and Conclusions of Law* submitted to the Court after the Preliminary Injunction hearings, Yusuf specifically asked for a finding that he was in charge of the business' functions which would include accounting and payment of taxes agreeing with Hamed's statement, to wit:

40. . . . as Fathi Yusuf "is in charge for everybody" and everything. (Jan. 25, 2013 Hr'g Tr. . . .(reflecting Mohammad Hamed's concession, even during his direct testimony, that "Mr. Yusuf he is in charge for everybody" [and] acknowledging again that Fathi Yusuf is in "charge" of "all the three stores.

. . . .

After the Court's April 2013 Preliminary Injunction was issued in response to that testimony, Yusuf continued his assertion that he alone was in charge of the Partnership's management functions -- as was the case in his May 9, 2013, Motion to Stay the Preliminary Injunction.

However, the testimony of the Plaintiff was clear when he admitted that he never worked in any management capacity at any of the Plaza Extra Stores, which role was under the exclusive ultimate control of Fathi Yusuf. . .[Id. at 6.]

**RFPD 43 of 50:**

Please produce any and all documents identified in or relating to your responses to

Hamed's RTA 49 of 50 which asks:

49. ADMIT or DENY that at the time the criminal tax evasion prosecuted in *United States of America v United Corp., et. al.*, VI D.Ct. 2005-cr-015, to which United pled guilty, was undertaken, Fathi Yusuf was in charge of the finances for the Plaza Extra Partnership and created the criminal plan to skim grocery store funds which led to the criminal conviction.

**Response:**

**RFPD 44 of 50:**

Please produce any and all documents which demonstrate that Mohammad Hamed "never worked in any management capacity at any of the Plaza Extra Stores, which role was under the exclusive ultimate control of Fathi Yusuf" at the time of the criminal activities to which the guilty plea was made and conviction entered.

**Response:**

**RFPD 45 of 50:**

Please produce any and all documents which disprove that that "management capacity at any of the Plaza Extra Stores [ ] was under the exclusive ultimate control of Fathi Yusuf" at the time of the criminal activities to which the guilty plea was made and conviction entered.

**Response:**

**RFPD 46 of 50:**

Please produce any and all documents which disprove that that "management capacity at any of the Plaza Extra Stores [ ] was under the exclusive ultimate control of Fathi Yusuf" at the time of the criminal activities to which the guilty plea was made and conviction entered.

**Response:**

**RFPD 47 of 50:**

Please produce any and all documents which prove or disprove that Fathi Yusuf planned, directed and controlled the criminal activities to which the guilty plea was made and conviction entered.

**Dated:** March 31, 2018



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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of March, 2018, I served a copy of the foregoing by email (CaseAnywhere ECF), as agreed by the parties, on:

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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).

