

CHART OF ALL HAMED DISCOVERY REQUESTS TO YUSUF - SORTED IN ORDER OF CLAIM NUMBERS

Claim #	Type	#	Text of the request	Date of Request
H-001	Interrog	3	<p>Reimbursement for sale of the Dorthea condo</p> <p>Describe what was sold and to whom, as well as each payment received for the sale of that stock -- with particularity. For each such payment, this will include but not be limited to payor, receiving party, amount, where deposited, present location of funds and what amount, if any, of this was given to any member of the Hamed family. Identify any documents which support or relate to your response, and any witnesses who would have knowledge and what knowledge you believe they have.</p>	2018-01-30
H-001	Doc Prod	19	<p>Request for the Production of Documents, 19 of 50, relates to H-1 (old Claim No. 201): "Reimbursement for sale of the Dorthea condo."</p> <p>With respect to H-1, please provide all documents relating to the payments received by Fathi Yusuf for the purchase of the Y & S Corporation 1000 shares, including, but not limited to, documents indicating the dates the payments were made to Fathi Yusuf and bank records showing the deposits of the payments made to Fathi Yusuf and any disbursements to the actual shareholders by Fathi Yusuf:</p> <p style="padding-left: 40px;">2. In consideration of the transfer of its 1000 shares of Y & S Corporation, Inc., Buyer agrees to pay to seller's nominee, Mr. Fathi Yusef of 9-C Princess Hill, St. Croix the sum of Nine Hundred Thousand (\$900,000.00) Dollars. 3. Price: The amount due and payable hereunder shall be paid over a period of four (4) years in four equal yearly installments, of Two Hundred and Twenty-Five Thousand (\$225,000.00) Dollars. The first installment shall become due on January 15, 2001, and the remaining installments shall become due on January 15, 2002, January 15, 2003, and January 15, 2004. 4. Interest: The installments due hereunder shall accrue interest on the outstanding balance at a rate of twelve percent (12 %) per annum until the entire balance is paid in full. Payment of interest is waived provided payment of each installment due is made within 30 days of the due date for such installment. In the event that an installment is late, the interest payable or accruable to the date of the late payment shall be paid to the IQRA School in St. Croix, United States Virgin Islands. Further, in the event of default, as default is defined hereunder, all interest accruable under this agreement shall be payable to the IQRA School. (See, HAMD601620- HAMD601624 at pp. HAMD601620-21)</p>	1/29/2018

H-001	Admit	30	<p>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 Dorthea condo.”</p> <p>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</p> <p>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.)</p>	1/29/2018
H-007	Interrog	17	<p>Interrogatory 17 of 50 relates to Claim H-7 (old Claim No. 248): “KAC357, Inc. payment of invoices from J. David Jackson, PC and H-8 (Old Claim No. 256): “David Jackson, CPA, bill owed for tax work done related to the Partnership’s 2013 taxes,” as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>With regard to Claims H-7 and H-8, state in detail why these invoices for work done for the Partnership were not paid by the Partnership. If you assert these are not Partnership expenses, state in detail why that is, with reference to all applicable documents, communications and witnesses.</p>	2018-01-30
H-013	Admit	1	<p>Request to admit number 1 of 50 relates to Claim H-13 (previously identified as 210) – described in the claims list as "Hamed payment of taxes during criminal case."</p> <p>Admit or deny that Fathi, Fawzia, Maher, Neje, Syaid, Zayed and Yusuf Yusuf's income taxes were paid with Partnership funds for the years 2002-2012, but the Hamed taxes were not paid with Partnership funds.</p>	1/29/2018
H-015	Interrog	18	<p>Interrogatory 18 of 50 relates to Claim H-15 (old Claim No. 242): Neje Yusuf’s cash withdrawals from safe,” as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>This interrogatory relates to Claim H-15. This is not a question about the practices surrounding twithdrawals from the safe generally, but rather an inquiry as to the particular time period set forth in the claim. State in detail how much cash Neje Yusuf removed from the safe, where it went and where it is now -- with reference to all applicable documents and any witnesses.</p>	2018-01-30

H-015	Admit	11	<p>Request to admit number 11 of 50 relates to Claim H-15 (old Claim No. 242) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Nejeh Yusuf's cash withdrawals from safe."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state the dates and amounts of Nejeh Yusuf's cash withdrawals from the large safe in the cash room of the Plaza ExtraSTT supermarket.</p>	1/29/2018
H-016	Admit	12	<p>Request to admit number 12 of 50 relates to Claim H-16 (old Claim No. 253) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Nejeh Yusuf's use of Partnership resources for his Private Business on STT."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state what Partnership resources (and the value of the Partnership resources) such as a compressor, shipping containers, personnel and trucks that Nejeh Yusuf used for his personal businesses.</p>	1/29/2018
H-017	Interrog	19	<p>Interrogatory 19 of 50 relates to Claim No. H-17 (old Claim No. 265): "Wally Hamed's personal payment of accounting and attorneys' fees in United States of America v United Corp., et. al., VI D.Ct. 2005-cr-015," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>With regard to Wally Hamed's personal payment of accounting and attorneys' fees in United States of America v United Corp., et. al., VI D.Ct. 2005-cr-015 (Claim No. H-17), describe why the Yusufs' accounting and attorneys' fees were paid with Partnership funds and Hameds' were not -- with reference to all applicable documents, communications and witnesses.</p>	2018-01-30
H-017	Interrog	48	<p>Please describe Joint Defense agreement ("JDA") in United States of America v United Corp., et. al., VI D.Ct. 2005-cr-015 referenced in the Declaration of Gordon C. Rhea, Esq. on March 2, 2017 (EXHIBIT B). In your description, please include, but not limited to, what defendants were covered, what attorneys were paid under the agreement, the terms of how payment should be made to the defendants' attorneys, how those payments were made, by whom the payments were made, when the payments were made, expert fees and expenses and the time period the JDA was in effect. Also describe how litigation decisions were made, who had conversations with attorneys directing their activities and which Defendants chose what would be stated in pleadings. (The response to this may be filed under seal if Yusuf asserts privilege or confidentiality, however, Hamed waives any such privilege or confidentiality.)</p>	2018-01-30

H-017	Admit	46	ADMIT or DENY that a Joint Defense Agreement was in effect until September 19, 2012, between defendants in United States of America v United Corp., et. al., VI D.Ct. 2005-cr-015, and that the United Corporation, Fathi Yusuf, Maher Yusuf, Nejeh Yusuf, Waleed Hamed and Waheed Hamed were parties to that Joint Defense Agreement.	1/29/2018
H-017	Admit	47	ADMIT or DENY all that legal and accounting work by the attorneys and accountants working under the Joint Defense agreement was on behalf of all represented defendants was paid for jointly when the Joint Defense Agreement was in effect in United States of America v United Corp., et. al., VI D.Ct. 2005-cr-015.	1/29/2018
H-017	Admit	48	ADMIT or DENY that a bill for attorneys' or accounting fees directed to a specific defendant did not reflect their individual personal obligation, as the bills were the joint obligation of all defendants while the Joint Defense Agreement was in effect in United States of America v United Corp., et. al., VI D.Ct. 2005-cr-015.	1/29/2018
H-017	Admit	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.	1/29/2018
H0-18	Admit	2	Request to admit number 2 of 50 relates to Claim H-18 (previously identified as 275) – described in the claims list as “ KAC357 Inc. payment of invoices from FreedMaxick. ” Admit or deny that the Partnership did not reimburse KAC357, Inc. for the invoices shown in Exhibit 275, of the Exhibits to JVZ Engagement Report, September 28, 2016, bates numbers JVZ-001240-JVZ-001241.	1/29/2018
H-019	Interrog	5	KAC357, Inc. payment of Partnership WAPA invoices Please explain why KAC357, Inc. was not reimbursed for this Partnership expense. If it was not a Partnership expense why not, and, if it was reimbursed, please identify where the reimbursement is reflected on the general ledger and describe the documents, including the dates, that evidenced this payment. Identify any documents which support or relate to your response, and any witnesses who would have knowledge and what knowledge you believe they have. See Exhibit 278, Exhibits to JVZ Engagement Report, September 28, 2016, bates numbers JVZ-001243-JVZ-001248.	2018-01-30
H-020	Doc Prod	8	Request for the Production of Documents, 8 of 50, relates to H-20 (old Claim No. 279): “ KAC357, Inc. payment of Tropical Shipping invoices. ” With respect to H-20, please provide all documents which relate to this transaction and entry in the accounting – the invoice(s), proof of reimbursement to KAC357, Inc., bank statements, etc. and particularly all underlying documents relating to any refusal to pay these invoices.	1/29/2018

H-021	Doc Prod	1	<p>RFPD number 1 of 50 relates to Claim H-21 (previously identified as 281) – described in the claims list as "Payment of Nejeh Yusuf credit card bill."</p> <p>Please provide all documents relating to or substantiating the \$49,715.05 in charges attributed to Nejeh Yusuf on the Bank of America credit card statement (5474 1500 8271 1556), including, but not limited to, credit card statements and invoices substantiating the charges -- and the Partnership business purpose therefore. See Exhibit 281, Exhibits to JVZ Engagement Report, September 28, 2016, bates numbers JVZ-001252-JVZ001253.</p>	1/29/2018
H-022	Interrog	20	<p>Interrogatory 20 of 50 relates to Claim No. H-22 (old Claim No. 290): "Nejeh Yusuf removed property belonging to KAC357, Inc.," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>This is not a general question, but rather an inquiry as to a particular time period. With respect to Claim No. H-22, state in detail exactly what property Nejeh Yusuf removed from the store as described in this claim, where it went and where it is now -- with reference to all applicable documents and witnesses.</p>	2018-01-30
H-022	Admit	13	<p>Request to admit number 13 of 50 relates to Claim H-22 (old Claim No. 290) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Nejeh Yusuf removed property belonging to KAC 357, Inc."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state what property (and the value of the property) Nejeh Yusuf removed after the sale of the St. Thomas Plaza Extra store to KAC357 Inc. without paying for.</p>	1/29/2018
H-022	Admit	15	<p>Request to admit number 15 of 50 relates to Claim H-27 (old Claim No. 319) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "BJ's Wholesale Club vendor credit."</p> <p>Admit or Deny that the BJ Wholesale Club vendor credit of \$5,632.57 applied to Mike Yusuf s personal credit card was not returned to the Partnership.</p>	1/29/2018
H-023	Interrog	4	<p>2015 Workers' Compensation payments for Plaza East</p> <p>For each of claims H-23, H-24, H-25, H-28 and H-29 individually, explain why Hamed or the Partnership is liable for such payments for goods/services provided after the stores were transferred to the individual partners. Identify any documents which support or relate to your response, and any witnesses who would have knowledge and what knowledge you believe they have.</p>	2018-01-30

H-026	Doc Prod	9	<p>Request for the Production of Documents, relates to H-26 (old Claim No. 316): “Inventory moved from Plaza West to East after official inventory.”</p> <p>Please provide all documents which relate to H-26 – particularly all underlying documents relating to any sales or transfers from West to East after the date of the inventory amount being set.</p>	1/29/2018
H-026	Admit	14	<p>Request to admit number 14 of 50 relates to Claim H-26 (old Claim No. 316) as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Inventory moved from Plaza West to East after official inventory.”</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state what inventory (and the value of that inventory) was moved from Plaza West to Plaza East shortly before the stores were transferred on March 9, 2015.</p>	1/29/2018
H-027	Doc Prod	10	<p>Request for the Production of Documents, 10 of 50, relates to H-27 (old Claim No. 319): “BJ’s Wholesale Club vendor credit.”</p> <p>With respect to H-27, please provide all documents, including, but not limited to, bank statements, credit card statements, canceled checks, and/or invoices, that demonstrates that the 2015 credit of \$5,632.57 from BJ Wholesales placed on Mike Yusuf’s personal credit card was properly reimbursed to the Partnership, or documents relating to the refusal to reimburse the Partnership.</p>	1/29/2018
H-030	Admit	16	<p>Request to admit number 16 of 50 relates to Claim H-30 (old Claim No. 333) as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “KAC357, Inc. payment of Partnership AT&T invoices.”</p> <p>Admit or Deny that the Partnership did not reimburse KAC357, Inc. for two AT&T invoices in the name of Plaza Extra Supermarket, totaling \$755.76 it paid, as reflected in Exhibits 333-a and 333-b, Exhibits to the JVZ Engagement Report, dated September 28, 2016.</p>	1/29/2018
H-031	Admit	17	<p>Request to admit number 17 of 50 relates to Claim H-31 (old Claim No. 334) as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Point of Sale transactions (purchases on account).”</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now state the detailed basis of point of sale transactions made by the Yusufs in each of the Plaza Extra supermarkets and then voided on the electronic journal, resulting in the Partnership, not the Yusufs, paying for the goods.</p>	1/29/2018

H-032	Admit	18	<p>Request to admit number 18 of 50 relates to Claim H-32 (old Claim No. 335) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "No credit for expired (spoiled) inventory discovered at Plaza Extra West."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state the amount and value of spoiled and expired inventory the Hameds discovered after the final inventory was complete and the transfer of the Plaza Extra West store had occurred.</p>	1/29/2018
H-033	Interrog	6	<p>Merrill Lynch accounts that still existed in 2012 (ML 140-21722, ML 140-07884, and ML 140-07951) financed with Partnership funds</p> <p>Describe in detail the purposes and use of Merrill Lynch accounts from 9/17/2006 through the present: ML 140-21722, ML 140-07884 and ML 140-07951. If any of these Merrill Lynch accounts have been closed, please identify the date the account was closed, who closed it, the amount remaining in the account at the time it was closed and who the money was given to at the time of closing. Identify any documents which support or relate to your response, and any witnesses who would have knowledge and what knowledge you believe they have.</p>	2018-01-30
H-033	Doc Prod	2	<p>RFPDs number 2 of 50 relates to Claim H-33 (previously identified as 338) – described in the claims list as "Merrill Lynch accounts that still existed in 2012 (ML-140- 21722, ML-140-07884 and ML-140-07951) financed with Partnership funds."</p> <p>Please provide all documents related to the following Merrill Lynch accounts from 9/17/2006 through the present: ML 140-21722, ML 140-07884 and ML 140-07951. Documents should include, but not be limited to, documents identifying the origins of the deposits into each Merrill Lynch account and the Merrill Lynch statements.</p>	1/29/2018
H-034	Interrog	7	<p>Rents collected from Triumphant church</p> <p>Please explain how, when and why rents from the church were collected by a Yusuf family member, and where those funds went. Describe all documents, including but not limited to, general ledger entries and cancelled checks, substantiating a credit back to the Partnership for the rents collected by NejeH Yusuf from the Triumphant church, as documented in Exhibit 340, Exhibits to JVZ Engagement Report, September 28, 2016, bates numbers JVZ-001369-JVZ-001382.</p>	2018-01-30

H-035	Interrog	32	<p>Interrogatory 32 of 50 relates to Claim No. H-35 (old Claim No. 343): “KAC357, Inc.’s American Express payments deposited to Partnership account,” as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>This interrogatory relates to Claim H-35. Describe all fact relevant to whether, after the Plaza Extra West store was transferred out of the Partnership, American Express payments to that Store were still being deposited into the Partnership Banco Popular account. Describe all facts relevant to whether this occurred due to an error in configuring the credit card processing machines on the part of the Banco Popular technician, or if not, why this occurred. Please explain any facts as to why tactical or legal basis as to why these amounts have not been reimbursed to KAC357, Inc. Include an identification of all documents or witnesses. If they have been reimbursed, please describe all documents that would substantiate the reimbursement, including, but not limited to, bank records.</p>	2018-01-30
H-035	Admit	19	<p>Request to admit number 19 of 50 relates to Claim H-35 (old Claim No. 343) as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “KAC357, Inc.’s American Express payments deposited to Partnership account.”</p> <p>Admit or Deny that the Partnership did not reimburse KAC357, Inc. for American Express payments belonging to KAC357, Inc. but, instead, deposited into the Partnership Banco Popular account, as reflected in Exhibits 343, Exhibits to the JVZ Engagement Report, dated September 28, 2016.</p>	1/29/2018
H-036	Doc Prod	11	<p>Request for the Production of Documents, 11 of 50, relates to H-36 (old Claim No. 345): “Unclear UVI payment.”</p> <p>With respect to H-36, please provide all documents, including, but not limited to, bank statements, credit card statements, canceled checks, and/or invoices, that demonstrate that the UVI payments that were erroneously deposited in the Plaza Extra East bank account after the transfer of the stores was reimbursed to KAC357, Inc. or documents relating to the refusal to reimburse KAC357, Inc.</p>	1/29/2018

H-037	Interrog	8	<p>Due to/from Fathi Yusuf</p> <p>Please provide a detailed explanation for each entry on Exhibit 353-a, including, but not limited to, the business purpose for each transaction, what each entry represents, who received what payouts from this entry and the amounts, where each entry is recorded on the general ledger (both current and historical, if applicable), and a description of the documents that support your response. Make sure your response includes the following general ledger entries:</p> <p>-West, 9130115, JE30-03, GENJ, CLEAR MISC YUSUF/PSHIP DUE TO /FR ACCOUNTS, \$120,167.33 -STT, 9/30/15, JE30-01, GENJ, CLEAR YUSUF/PSHIP MISC DUE TO /FR ACCOUNTS ON 9130, \$186,819.33 -West, 9/30/15, JE03-30, GENJ, CLEAR MISC YUSUF/PSHIP DUE TO/FR ACCOUNTS, \$900,000</p> <p>(See Exhibit 353-a, Exhibits to JVZ Engagement Report, September 28, 2016, bates number JVZ-001543.)</p>	2018-01-30
H-039	Admit	20	<p>Request to admit number 20 of 50 relates to Claim H-39 (old Claim No. 358) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "STT Tutu gift certificates."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now determine whether 143 of the gift certificates that were purchased prior to the sale and separation and were redeemed at Plaza Extra-STT after the split were reimbursed to KAC357, Inc., as reflected in Exhibits 358, Exhibits to the JVZ Engagement Report, dated September 28, 2016.</p>	1/29/2018
H-040	Admit	21	<p>Request to admit number 21 of 50 relates to Claim H-40 (old Claim No. 360) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Approximately \$18 million in "purged" (i.e., missing) transactions in 2013."</p> <p>Admit or deny that not all of the original 2013 bookkeeping transactions that were in the computer accounting system are in the Sage 50 2013 transactions provided to Hamed.</p>	1/29/2018
H-129	Doc Prod	37	<p>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.</p>	1/29/2018
H-129	Doc Prod	38	<p>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.</p>	1/29/2018
H-129	Doc Prod	39	<p>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.</p>	1/29/2018
H-129	Doc Prod	40	<p>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.</p>	1/29/2018

H-141	Doc Prod	12	<p>Request for the Production of Documents, 12 of 50, relates to H-141 (old Claim No. 488): “Unclear general ledger entry “due t/fr settlement re stmt at 9/30/15.”</p> <p>With respect to H-141, please provide all documents which relate to this entry – particularly all underlying documents relating to the 9/30/15 settlement referenced, the funds involved and their disposition.</p>	1/29/2018
H-142	Interrog	21	<p>Interrogatory 21 of 50 relates to Claim No. H-142 (old Claim No. 490): “Half acre in Estate Tutu,” as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>With respect to Claim No. H-142, state in detail how this half acre in Estate Tutu was purchased and what funds were used, the source of those funds and any discussions or agreements about the funds or the purchase, with reference to all applicable documents, communications and witnesses.</p>	2018-01-30
H-142	Doc Prod	13	<p>Request for the Production of Documents, 13 of 50, relates to H-142 (old Claim No. 490): “Half acre in Estate Tutu.”</p> <p>With respect to H-142, please provide all documents which relate to this entry -- particularly (but not limited to) all underlying documents relating to the source of funds for the purchase of this property if it was other than income from the stores.</p>	1/29/2018
H-142	Admit	22	<p>Request to admit number 22 of 50 relates to Claim H-142 (old Claim No. 490) as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Half acre in Estate Tutu.”</p> <p>Admit or Deny that the Partnership (or Hamed and Yusuf) did provide the funds for the purchase of this land referenced in Claim H-142, “Half acre in Estate Tutu,” by using income from the Plaza Extra stores</p>	1/29/2018
H-143	Interrog	1	<p>This interrogatory relates to Claim H-143 (which previously was identified as 490 in Hamed's Expert Report) -- described in the claims list as "Plaza Extra East land" being that small parcel which constitutes the back section of the East Store and property outside behind that back section.</p> <p>Please describe in detail when, under what circumstances, why, and how this land was purchased and by what person or entity (and by whom it is owned now); also stating as part of that detail, where the funds to purchase this land came from, and if the source was fully or partially an insurance policy, state whether grocery store proceeds were used to pay for that policy -- and describe any related documents, or documents that support or contradict your response.</p>	2018-01-30

H-144	Interrog	9	<p>\$900,000 Estimated tax payment for United Corporation shareholders in April 2013</p> <p>Please provide a detailed explanation for the April 2013 \$900,000 estimated tax payment for United Corporation shareholders, including, but not limited to, the business reason for the payout, the names of the individuals whose taxes were being paid and the amount paid for each individual, a description of why the Partnership should pay United Corporation shareholders' taxes, an entity wholly separate from the Partnership, and a description of all documents related to this entry. If the Hameds received an equal payout, please describe the general ledger entry substantiating that payout and describe all of the documents evidencing that payout (cancelled checks, for example). If they did not, explain why.</p>	2018-01-30
H-144	Doc Prod	20	<p>Request for the Production of Documents, 20 of 50, relates to H-144 (old Claim No. 492): "\$900,000 Estimated tax payment for United Corporation shareholders."</p> <p>With respect to H-144, an estimated tax payment in April 2013 using Partnership funds was made for United Corporation shareholders. Please provide all documents related to this expenditure, including but not limited to: any written agreements that Partnership funds would be used in this manner, tax returns for each United shareholder documenting any such payments, as well as any documentation showing that the Hameds' taxes for the same time period were paid by the Partnership.</p>	1/29/2018
H-145	Interrog	10	<p>WAPA deposits paid with Partnership funds</p> <p>Explain the allocation of the returned WAPA deposit and interest, including, but not limited to, why the return of Partnership funds was allocated to the United Corporation, why that distribution to United was called a capital distribution, a description of all documents, testimony or affidavits showing that United funds were used for the initial deposit, why the WAPA deposit and interest for PE-West was allocated to Plessen, even though the funds are Partnership funds and how much of the PE-Tutu deposit and interest was allocated to expenses that occurred after May 1, 2015, a description of exactly where the deposit and interest ended up for each of the three stores and a detailed description of all of the documents that support your answer.</p>	2018-01-30
H-146	Interrog	22	<p>Interrogatory 22 of 50 relates to Claim No. H-146 (old Claim No. 3007): "Imbalance in credit card points," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>With respect to H-146, state the approximate value of these credit card points, by describing: the approximate number of points in each of the years 2008-the date of the splitting of the East and West stores; the present value of that many points if negotiated on the date of these answers at the point-to-dollar value now -- and show all of your calculations, sources of information and support for this approximation.</p>	2018-01-30

H-146	Admit	23	<p>Request to admit number 23 of 50 relates to Claim H-146 (old Claim No. 3007) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Imbalance in credit card points."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state with specificity what credit card points were earned by paying for purchases/expenses incurred on behalf of the Partnership on the personal credit cards of the Hameds and Yusufs, and thus, whether these points were split evenly between the Partners.</p>	1/29/2018
H-147	Interrog	23	<p>Interrogatory 23 of 50 relates to Claim No. H-147 (old Claim No. 3010): "Vendor rebates," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>With respect to Claim No. H-147, for each of the years from 2008 through the date of the splitting of the East, West and STT stores, identify each rebate by vendor, state the amount of each rebate, describe the process for ensuring that rebates applied to the personal, not Partnership, credit cards were reimbursed to the Partnership, including any controls in place to ensure reimbursement to the Partnership, and describe all documents with particularity (e.g., name of document, date of document, name of person or entity the document relates to) documenting the whole rebate cycle for each rebate—from vendor, to Partnership by check, Partnership credit card or personal credit card, and, if applicable, reimbursement of the rebate from the personal credit card to the Partnership.</p>	2018-01-30
H-147	Admit	24	<p>Request to admit number 24 of 50 relates to Claim H-147 (old Claim No. 3010) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Vendor rebates."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state with specificity what v were earned by vendor rebates -- paying for purchases/expenses incurred on behalf of the Partnership on the personal credit cards of the Hameds and Yusufs, and thus, whether these vendor rebates were split evenly between the Partners.</p>	1/29/2018
H-148	Doc Prod	14	<p>Request for the Production of Documents,14 of 50, relates to H-148 (old Claim No. 3011): "Excessive travel and entertainment expenses."</p> <p>If the answer to the request to admit as to H-148 is "deny," please provide the backup documentation for all travel expenses for the members of the Yusuf family from 2007 to 2014 that exceed \$1000, as it relates to H-148</p>	1/29/2018

H-148	Admit	25	<p>Request to admit number 25 of 50 relates to Claim H-148 (old Claim No. 3011) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Excessive travel and entertainment expenses."</p> <p>Admit or Deny that the Partnership's management and accountant did not keep adequate records to allow the Partnership to now calculate and state exactly to where and for what business purpose the travel and entertainment charges appearing in the books of the Partnership were made.</p>	1/29/2018
H-149	Doc Prod	3	<p>RFPD 3 of 50 relates to Claim H-149 (previously identified as 246, 255, 260, 318) – described in the claims list as "Seaside Market & Deli LLC."</p> <p>Please provide all documents related to transactions between the Partnership, United or the Plaza Extra Stores and the Seaside Market & Deli. These documents should include, but not be limited to, invoices, description of inventory sold to Seaside, pricing of inventory sold to Seaside, shipping invoices for the goods shipped to Seaside, and general ledger entries documenting the Plaza Extra, United and Seaside transactions. These documents should be provided up to the date of the transfer of the East and West stores on March 9, 2015.</p>	1/29/2018
H-151	Doc Prod	4	<p>RFPD 4 of 50 relates to Claim H-151 (previously identified as 3004a) – described in the claims list as "Checks written to Fathi Yusuf for personal use."</p> <p>For all of the Partnership bank accounts, please provide all bank statements reflecting checks written to Fathi Yusuf, the United Corporation, as well as the cancelled checks, from 9/17/2006 to present.</p>	1/29/2018
H-153	Admit	3	<p>Request to admit number 3 of 50 relates to Claim H-153 (previously identified as 3009a) – described in the claims list as "Partnership funds used to pay United Shopping Center's property insurance."</p> <p>Admit or deny that after 9/17/2006 the Partnership paid the United Shopping Center's property insurance -- which included protection for properties other than the Plaza East Store.</p>	1/29/2018

H-154	Interrog	24	<p>Interrogatory 24 of 50 relates to Claim No. H-154 (old Claim No. 346a): “Attorney and accounting fees paid by the Partnership for the criminal case,” as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>With respect to Claim No. H-154, describe in detail, with specifics as to who proposed the acts, when and how the Partnership's plan to remove, hide from taxing authorities and then launder income from the stores, came about -- and Yusuf's best approximation of the amounts removed and where they went As part of that explanation describe who was "in charge" of the decision-making and finances for the stores at that time and how the decision-making for the money-laundering scheme differed from the normal management. Also, state specifically, in detail, whether Fathi Yusuf thought up, directed and managed that money-laundering scheme, and if not, why not and who did -- with reference to Mohammad Hamed's role. Be specific as to dates, locations, times, events and, most importantly, amounts removed and laundered.</p>	2018-01-30
H-155	Interrog	11	<p>Employee Loans</p> <p>Please describe each loan in detail, including the date the loan was paid back, where that is reflected on the general ledger, what the \$26,170.57 represents and how that amount was allocated between the Partners (including a description of where the \$26,170.57 allocation between the Partners is located on the general ledger), provide a description of any documents related to the employee loans listed and the employee loans due to poor accounting, and why the loans were reflected as payables and not receivables</p> <p>-West, 7/17/13, 20130717, PJ, ABDELKRIM BOUCENNA - EMPLOYEE LOAN, \$2,000 -West, 10/18/13, 20131018 -LOAN, PJ Lissette Lima, \$4,000.00/West, 10/18/13, 6645, CDJ, LISSETTE LIMA - Invoice: 20131018 -LOAN, \$4,000.00 -West, 9/30/15, XJE30 -05, GENJ, W/O EMP LOANS DUE TO POOR ACTG & EMP XFERS AFTER SPLIT, \$26,170.57.</p>	2018-01-30
H-156	Interrog	12	<p>Unclear General Ledger entries regarding miscellaneous adjustments to employee loans</p> <p>For the following transactions, please explain what "misc adj's to empl lns per analysis" means, what "restore emp loans to GL per analysis" means, what analysis was conducted for each transaction, describe in detail when, how and why each transaction was made, who approved it and describe all documents related to these three transactions:</p> <p>-West, 7/31/13, XJE31-2, GENJ, RECORD MISC ADJ'S TO EMP LNS PER ANALYSIS, \$ 48,968.00 - West, 2/28/13, JE32-02, GENJ, Restore Emp Loans to GL per Analysis, \$36,975.26 -West, 2/28/13, JE32-02, GENJ, Restore Emp Loans to GL per Analysis, \$36,961.40</p>	2018-01-30

H-157	Interrog	31	<p>Interrogatory 31 of 50 relates to Claim H-157 (old Claim No. 402/418): Unclear general ledger entry regarding 'Fathi Yusuf refund of overpayment'," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.</p> <p>This interrogatory relates to Claim H-157. Please describe in detail what the general ledger entry "West, 7/14/15, JE14, GENJ, YUSUF REFUND OF OVERPMT, \$77,335.62," references, including why Yusuf was entitled to a refund of overpayment in the amount of \$77,335.62, what the \$77,335.62 covers, a description of all documents supporting this transaction and identification of any witnesses and what knowledge you believe they have.</p>	2018-01-30
H-157	Doc Prod	15	<p>Request for the Production of Documents,15 of 50, relates to H-157 (old Claim No. 402/418): "Unclear general ledger entry regarding 'Fathi Yusuf refund of overpayment'."</p> <p>With respect to H-157, please provide all documents which relate to this transaction and accounting entry -- particularly (but not limited to) all underlying documents relating to the general ledger entry "West, 7/14/15, JE14, GENJ, YUSUF REFUND OF OVERPMT, \$77,335.62."</p>	1/29/2018
H-158	Interrog	13	<p>Unclear general ledger entries for By Order</p> <p>For the entry listed below, please describe who By-Order is, what this entry is for, detail all transactions that went into this amount and provide a description of all documentation supporting this entry, including, but not limited to, canceled checks, bank statements, credit card statements, and invoices:</p> <p>-West, 9/30/15, JE31, GENJ, ADJ BYORDER 2015 FULL SETTLE BY SHOP CRT AS DIV, \$260,490.72</p>	2018-01-30
H-159	Doc Prod	16	<p>GENERAL LEDGER ENTRIES INDICATING ACCOUNTS PAYABLE TRADE PAYMENTS TO UNITED CORPORATION IN 2015</p> <p>Request for the Production of Documents,16 of 50, relates to H-159 (old Claim No. 442/407): "Unclear general ledger entries indicating Accounts Payable-trade payments to United Corporation in 2015."</p> <p>With respect to H-159, please provide all documents which relate to, support, and explain all of the accounts payable-trade payments made to the United Corporation in 2015, including, but not limited to invoices, bank statements, credit card statements, and canceled checks.</p>	1/29/2018

H-162	Doc Prod	5	RFPD 5 of 50 relates to Claim H-162 (previously identified as Exhibit A-L) – described in the claims list as “ Claims based on monitoring reports/accounting 2007- 2012). ” Please provide all documents to and/or from the United States or the United States Virgin Islands government or monitors from 9/17/2006 to present related to monitoring or monitoring reports prepared in connection with the US v United et. al, criminal case, 2005-15 (D.V.I.).	1/29/2018
H-163	Interrog	25	Interrogatory 25 of 50 relates to Claim No. H-163 (old Claim No. Exhibit A-M): “ Loss of assets due to wrongful dissolution—attorney’s fees, ” as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits. With respect to Claim No. H-163, (1) State in detail the factual basis that Yusuf had in September through March of 2012-2013 for asserting that there was no Hamed-Yusuf Partnership as to the 3 Plaza Extra Stores, that he had the right to call the police to have the Hameds removed from the stores and had the right to cut Hamed off from partnership accounts. Identify any supporting documents as to this. (2) Describe in detail why, even if Yusuf had the beliefs set forth in his response to the foregoing, if he eventually admitted the existence of the Partnership for the purpose of this action, such actions did not constitute a breach of the Partnership agreement.	2018-01-30
h-163	Interrog	28	Describe in detail any criminal charges, convictions, plea agreements, or other criminal actions as to Fathi Yusuf or any entity which he controlled other than United Corporation. For each such event describe in detail, the dates involved, the police or other authority involved, the full description of the charges, the full description of the proceedings, the outcome, any restrictions imposed on Fathi Yusuf during or after -- with a description of all relevant documents and witnesses.	2018-01-30
H-163	Doc Prod	43	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.	1/29/2018
H-163	Doc Prod	44	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.	1/29/2018
H-163	Doc Prod	45	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.	1/29/2018
H-163	Doc Prod	46	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.	1/29/2018

H-163	Doc Prod	47	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.	1/29/2018
H-163	Admit	26	Request to admit number 26 of 50 relates to Claim H-163 (old Claim No. Exhibit A-M) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as " Loss of assets due to wrongful dissolution – attorney's fees. " Admit or Deny that Yusuf initially denied the Partnership existed, but later explicitly admitted it did exist and requested that the Partnership be dissolved.	1/29/2018
H-163	Admit	27	Request to admit number 27 of 50 relates to Claim H-163 (old Claim No. Exhibit A-M) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as " Loss of assets due to wrongful dissolution – attorney's fees. " Admit or Deny that at the time in 2012 when Yusuf unilaterally removed \$2.7 million from a bank account to which Hamed had access, there was a Partnership between Hamed and Yusuf as to the funds in that account and that Yusuf asserted that there was no such Partnership.	1/29/2018
H-163	Admit	28	Request to admit number 28 of 50 relates to Claim H-163 (old Claim No. Exhibit A-M) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as " Loss of assets due to wrongful dissolution – attorney's fees. " Admit or Deny that Yusuf did cut off Hamed's access and control as to some of the Partnership bank accounts at some point within the period from January 2013 to March 2013.	1/29/2018
H-163	Admit	29	Request to admit number 29 of 50 relates to Claim H-163 (old Claim No. Exhibit A-M) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as " Loss of assets due to wrongful dissolution – attorney's fees. " Admit or deny that Yusuf did make unilateral decisions to spend Partnership funds during the period from January to March 2013 and did spend those funds in a manner that Hamed or Hamed's counsel disagreed with in writing.	1/29/2018
H-164	Interrog	26	Interrogatory 26 of 50 relates to Claim No. H-164: " Inventory adjusted downward by \$1,660,000 due to unrecorded inventory transfers to other stores, " as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3. With respect to Claim No. H-164, describe all transactions in detail that relate to the inventory adjusted downward by \$1,660,000 due to unrecorded inventory transfers to other stores, with reference, for each such transaction, to all related and underlying documents.	2018-01-30

H-165	Interrog	27	<p>Interrogatory 27 of 50 relates to Claim No. H-165: "Debts totaling \$176,267.97, which must be paid prior to any distribution of the remaining Partnership Assets to the Partners," as of September 30, 2016, as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3</p> <p>With respect to H-165, describe in detail, with reference to all related and underlying documents, each of the "debts totaling \$176,267.97, which must be paid prior to any distribution of the remaining Partnership Assets to the Partners."</p>	2018-01-30
H-166	Doc Prod	17	<p>Request for the Production of Documents, 17 of 50, as described in Hamed's February 15, 2016 Requests to John Gaffney re GL by Item Number and the September 28, 2016 JVZ Engagement Report and Exhibits, relates to H-166 (old Claim No. 218): "Entry for Tutu Park Ltd for \$30,359.38."</p> <p>With respect to H-166, please provide all documents which relate to, support and explain the transaction and accounting entry for Tutu Park Ltd for \$30,359.38, including, but not limited to invoices, bank statements, credit card statements, and canceled checks.</p>	1/29/2018
H-167	Doc Prod	18	<p>Request for the Production of Documents, 18 of 50, as described in Hamed's February 15, 2016 Requests to John Gaffney re GL by Item Number and the September 28, 2016 JVZ Engagement Report and Exhibits, relates to H-167 (old Claim No. 220): "Checks to Daytona Beach Market & Deli."</p> <p>With respect to H-167, please provide all documents which relate to, support and explain all of the 2013 general ledger entries "checks to Daytona Beach Market & Deli," including, but not limited to documents identifying that entity, invoices, bank statements, credit card statements, and canceled checks. This is an unfamiliar vendor to the Hameds.</p>	1/29/2018
Y-001	Interrog	33	<p>Substantially the Same as Yusuf ROG 1.</p> <p>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.</p>	2018-01-30
Y-001	Admit	33	<p>Substantially the same as Yusuf RTA #1</p> <p>Admit that Yusuf family members removed money from the safes at the Plaza Extra Stores without creating a written record of the withdrawal.</p>	1/29/2018

Y-002	Interrog	29	Interrogatory 29 of 50, relates to Claim Y-2: "Rents for Bays 5 & 8." Please describe all facts related to this claim with reference to dates, documents, witnesses and what facts, conversations, writings, communications or other information or documents that leads United to believe and assert that it had an agreement with Hamed to pay rent for Bays 5 and 8. Include in your description the dates of the conversations, writings, communication or other documents, the place where these discussions or meetings took place and identify the participants to the discussions or meetings. Include in your response, but do not limit it to what facts, conversations, writings, communications or other information or documents that leads Yusuf to believe and assert that any consent for such an arrangement survived the bringing of a suit in September of 2012.	2018-01-30
Y-002	Interrog	34	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.	2018-01-30
Y-002	Doc Prod	21	Request for the Production of Documents, 21 of 50, relates to Y-2: "Rent for Bays 5 & 8." With respect to Y-2, please provide all documents demonstrating a written agreement that Hamed or the Partnership agreed to pay rent for Bays 5 & 8, including any documents establishing the amount of rent, a signed lease agreement and any prior payments of rent on Bays 5 & 8. Include but do not limit this to any writings after Hamed brought suit in September of 2012, that would show any such consent or agreement continued after that suit.	1/29/2018
Y-002	Doc Prod	28	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, Nejeh and Yusuf Yusuf or any company controlled more than 49%, submitted to any person or institution from September 17, 2006 to present.	1/29/2018
Y-002	Admit	34	Substantially the same as Yusuf RTA # 2 Admit that a settlement was reached for all Partnership uses of Plaza Extra East facilities and did not specify that it was solely for Bay 1 .	1/29/2018

Y-002	Admit	45	<p>Request to Admit 45 relates to Yusuf claims for rent as to Bays other than Bay 1 at the Sion Farm (plaza East Store) location. Defendants are directed to review attached Exhibits 1 and 2. Exhibits 1 and 2 were provided as copies of original documents and authenticated by Fathi Yusuf -- as an attachment to his Affidavit in support of his 8/12/2015 motion for Summary judgment.</p> <p>Admit or Deny that Exhibit 2 is a February 7, 2012, check numbered 64866, bearing the memo "PLAZA EXTRA (SION FARM) RENT" -- conveying back rent payment funds to United Corporation for the benefit of the Partnership -- and that neither that check nor the calculations set forth on Exhibit 1 state anywhere on the face of either document that the back rent for the Store in Sion Farm being paid, was restricted to "BAY 1", or have any language excluding any other Bays at the Sion Farm location.</p>	1/29/2018
Y-002	Admit	7	<p>Admit or Deny that when Hamed sued Yusuf, on or about September 17, 2012, "to establish Hamed's rights under his partnership" and "enjoining the defendants from interfering with Hamed's partnership rights, including enjoining Yusuf from interfering with the operations of the three Plaza Extra supermarkets" that any prior or then existing voluntary consent by Hamed -- for Fathi Yusuf to unilaterally act for the Partnership or for the benefit of United Corporation using Partnership funds -- ended.</p>	1/29/2018
Y-003	Interrog	35	<p>Substantially the Same as Yusuf ROG 3</p> <p>Please identify all sources of income for 1) Fathi, 2) Mike, 3) Neje, 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.</p>	2018-01-30
Y-003	Admit	8	<p>Request to admit number 8 of 50 relates to Claim Y-3 – as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Interest on Bay 1 Rent Already Awarded by the Court on 4/27/2015."</p> <p>Admit or Deny that there was no written agreement between Hamed and Yusuf effective after September 17, 2012, (the date that Hamed sued Yusuf) that the Partnership would pay interest on Bay 1.</p>	1/29/2018
Y-004	Interrog	36	<p>Substantially the Same as Yusuf ROG 4</p> <p>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?</p>	2018-01-30
Y-004	Doc Prod	29	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 4</p> <p>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.</p>	1/29/2018

Y-004	Admit	9	<p>Request to admit number 9 of 50 relates to Claim Y-4 – as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Interest on Bays 5 & 8."</p> <p>Admit or Deny that there was no written agreement between Hamed and Yusuf after the date that Hamed sued Yusuf in 2012 that the Partnership would pay rent on Bays 5 & 8.</p>	1/29/2018
Y-005	Interrog	16	<p>Interrogatory 16 of 50, relates to Y-5: "Reimburse United for Gross Receipt Taxes," H-150 (old Claim No. 3002a) and H-160 (old Claim No. Exhibit A-H): "United Shopping Center's gross receipts taxes," H-152 (old Claim No. 3008a): "United's corporate franchise taxes and annual franchise fees," and H-153 (old Claim No. 3009a): "Partnership funds used to pay United Shopping Center's property insurance."</p> <p>State with specificity why, assuming that Yusuf is correct that Hamed had agreed that the Partnership would pay the separate (non-partnership-related) United Corporation costs for such things as GRT taxes, franchise taxes and fees, property insurance, etc., -- what facts, conversations, writings, communications or other information or documents leads Yusuf to believe and assert that he continued to have Hamed's consent as to such payments after September 17, 2012, despite a lawsuit filed by Hamed seeking to stop Yusuf's involvement in the Partnership, with a claim of outright theft by Hamed, as well as Yusuf's denial of the existence of a partnership, attempted removal of the Hameds from the stores by Yusuf and letters from Hamed and his counsel stating that various of the unilateral uses of funds, payments and actions were henceforth denied and actionable?</p>	2018-01-30
Y-005	Doc Prod	30	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 5</p> <p>Please produce copies of all original tax returns filed by United, Fathi, Mike, Negeh and Yusuf Yusuf from 1986 to date.</p>	1/29/2018
Y-005	Admit	10	<p>Request to admit number 10 of 50 as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master relates to Claim Y-5 as "Reimburse United for Gross Receipt Taxes," Claim H-150 (old Claim No. 3002a) "United Shopping Center's gross receipt taxes," H-152 (old Claim No. 3008a) "United's corporate franchise tax and annual franchise fees," H-153 (old Claim No. 3009a) "Partnership funds used to pay United Shopping Center's property insurance" and H-160 (old Claim No. Exhibit A-H) "United Shopping Center's gross receipt taxes."</p> <p>With regard to Yusuf Claim Y-5 and Hamed Claims H-150, H-152, H-153 and H-160, Admit or Deny that there was no written agreement effective after September 17, 2012, between Hamed and Yusuf (i.e. after the date that Hamed sued Yusuf in 2012 for breach of the Partnership) that the Partnership would continue to pay United's separate gross receipt taxes, franchise taxes, annual franchise fees and property insurance.</p>	1/29/2018

Y-006	Interrog	14	<p>Interrogatory 14 of 50 relates to Claim Y-6 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Black Book Balances Owed United” and Exhibit G to Yusuf’s Original Claims, Relevant Black Book Entries.</p> <p>Please fully describe Exhibit G – Relevant Black Book Entries, including but not limited to, the physical location of where this “Black Book” was when it was found, who first found this “Black Book,” the total number of pages in this “Black Book,” how this “Black Book” made it to its physical location, when the “Black Book” was placed in the location where it was found, whether the FBI ever had possession of this “Black Book”, and if so for what dates, an explanation of each entry in Exhibit G, including, but not limited to, what the designation “ck #” signifies, including the bank account associated with the entry; the date of the transaction for each entry (including the year); a description of each expenditure/description (e.g., p. 2, what does “Less Fathi Yusuf \$2,500.00 mean”), an explanation of why each entry is a business expense of the Partnership, a description of the documents supporting each expenditure/description (e.g., an invoice), a translation of each Arabic word/phrase/description in the exhibit, and the length of time that passed between each entry and the date the FBI seized the document -- with a description of all bank, investment and other documents referenced in the exhibit or your explanation.</p>	2018-01-30
Y-006	Interrog	37	<p>Substantially the Same as Yusuf ROG 6</p> <p>Identify all distributions from the Partnership to any member of the Yusuf family or United Corporation from September 17, 2006 to present?</p>	2018-01-30
Y-006	Doc Prod	31	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 6</p> <p>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, Neje 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.</p>	1/29/2018
Y-006	Admit	4	<p>Request to admit number 4 of 50 relates to Claim Y-6 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Black Book Balances Owed United.”</p> <p>Admit or deny that claims listed in Exhibit G to Yusuf’s Original Claims, Relevant Black Book Entries, occurred in 1994 or earlier, and occurred more than six years before the FBI seized the document.</p>	1/29/2018

Y-006, Y-7	Doc Prod	7	<p>Request for the production of documents, number 7 of 50, relates to Claims Y-6 and Y-7 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Y-6 – Black Book Balances Owed United” and “Y-7 – Ledger Balances Owed United.”</p> <p>Please provide the complete Black Book referenced in Yusuf Exhibits to the Original Claims, G – Relevant Black Book Entries and the complete ledger document referenced in Exhibit H – Ledger Sheets Reflecting United’s Payments for Plaza Extra.</p>	1/29/2018
Y-006, Y-7, Y-9	Doc Prod	6	<p>Request for the production of documents, number 6 of 50, relates to Claims Y-6, Y-7 and Y-9 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Y-6 – Black Book Balances Owed United,” “Y-7 – Ledger Balances Owed United,” and “Y-9 – Unreimbursed Transfers from United.”</p> <p>Please provide all United Tenant Account bank statements from 1992 to the present, including all deposit slips and canceled checks; all Plaza Extra adjusted journal entries related to United transfers and general ledger statements from 1992 to the present (excluding those provided to the Hamed accountants on the Sage 50 system); as well as all invoices, receipts or other documentation substantiating each entry on Yusuf Exhibits to the Original Claims, G – Relevant Black Book Entries, H – Ledger Sheets Reflecting United’s Payments for Plaza Extra, and I – Summary and Supporting Documentation of Unreimbursed Transfers from United.</p>	1/29/2018
Y-007	Interrog	15	<p>Interrogatory 15 of 50 relates to Claim Y-7 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Ledger Balances Owed United” and Exhibit H to Yusuf’s Original Claims, Ledger Sheets Reflecting United’s Payments for Plaza Extra.</p> <p>Please fully describe Exhibit H “Ledger Sheets Reflecting United’s Payments for Plaza Extra,” including, but not limited to, the physical location where this ledger sheet was found, who first found this ledger sheet, how this ledger sheet made it to its physical location, when the ledger sheet was placed in the location where it was found, whether the FBI ever had possession of this ledger sheet and if so, the dates of that possession, whether the ledger sheet is part of a larger document, and if so, the total number of pages in the larger document, an explanation of each entry on the ledger sheet, including, but not limited to, the date of each transaction reflected in each entry (including the year), a description of each entry (e.g., what is the name of the person the bedroom set in 1998 was purchased for), an explanation of why each entry is a business expense of the Partnership, and a description of the documents supporting each expenditure description (e.g., an invoice). Also, for each such entry, state the length of time that passed between each entry and the date the FBI seized the document -- with a description of all bank, investment and other documents referenced in the exhibit or your explanation.</p>	2018-01-30

Y-007	Interrog	45	<p>Similarly, Maher Yusuf testified that the ledger excerpts sent in regard to this case were not the full set of all such ledgers, most clearly at pages 57-58:</p> <p>A. I mean, Mr. Mohammad was pulling, you know, he was pulling some good money. Q. Right. And if your father wanted to, you called it "pulling some good money"? A. Yeah, he was pulling some good money, from the numbers you see here. Q. I see. And was your father pulling some good money? A. From where? Q. From you. A. He was not here. He was in St. Thomas. Q. No, no. I'm just asking the question. Was he -- first, let's start with, was he pulling it from you? A. No. Q. No. Where was your father pulling it? A. I'm not sure where he was pulling it from. I was not there where he was. Q. Okay. He was in St. Thomas, right? A. He was in St. Thomas. I'm in St. Croix. Q. Okay. So if money was coming out by your father in St. Thomas, you wouldn't have been the one keeping the records, right? A. No.</p> <p>explain in detail, including (but not limited to) reference to any applicable documents, dates, conversations, to whom (or what entity) the amounts are owed, witnesses, how many total ledger books existed at different times in the Partnership at each location, more particularly in 2001 prior to the FBI-raid, on September 17, 2006 and presently -- where they are and how it can be determined that they are complete with regard to the amounts that Fathi Yusuf "pulled" as that term is used here by Maher Yusuf?</p>	2018-01-30
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Y-007	Interrog	46	<p>Similarly, Maher Yusuf testified that the ledger excerpts sent in regard to this case were not the full set of all such ledgers, most clearly at pages 57-58:</p> <p>A. I mean, Mr. Mohammad was pulling, you know, he was pulling some good money. Q. Right. And if your father wanted to, you called it "pulling some good money"? A. Yeah, he was pulling some good money, from the numbers you see here. Q. I see. And was your father pulling some good money? A. From where? Q. From you. A. He was not here. He was in St. Thomas. Q. No, no. I'm just asking the question. Was he -- first, let's start with, was he pulling it from you? A. No. Q. No. Where was your father pulling it? A. I'm not sure where he was pulling it from. I was not there where he was. Q. Okay. He was in St. Thomas, right? A. He was in St. Thomas. I'm in St. Croix. Q. Okay. So if money was coming out by your father in St. Thomas, you wouldn't have been the one keeping the records, right? A. No.</p> <p>explain in detail, including (but not limited to) reference to any applicable documents, dates, conversations, to whom (or what entity) the amounts are owed, witnesses, how many total ledger books existed at different times in the Partnership at each location, more particularly in 2001 prior to the FBI-raid, on September 17, 2006 and presently -- where they are and how it can be determined that they are complete with regard to the amounts that Fathi Yusuf "pulled" as that term is used here by Maher Yusuf?</p>	2018-01-30
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Y-007	Interrog 47	<p>Similarly, Maher Yusuf testified that the ledger entries referenced in regard to this case were sometimes made in ledgers, but also sometimes made in "receipts" and that many of those receipts were destroyed prior to the FBI raid in 2001, most clearly at pages 58- 63</p> <p>Q. Okay. So -- so for every time money was withdrawn from the safe, one of two things -- when you were in control of it, one or two things happened, is that correct? Either you wrote a line in the ledger for Mohammad Hamed, or you filled out one of these receipts.</p> <p>A. Right.</p> <p>Q. What did -- was there a generic name for these receipts that everybody called them? A. Receipts.</p> <p>Q. Were they called chits ever?</p> <p>A. You guys came up with that word.</p> <p>Q. Oh, okay.</p> <p>A. I never heard that word before.</p> <p>Q. Okay. So these were all receipts.</p> <p>A. Right.</p> <p>Q. Okay. And -- and so for every transaction where cash was removed from any of the safes, -- There were three safe rooms, one in each store, is that correct?</p> <p>A. Yes.</p> <p>Q. -- there would have either been an entry in a ledger, or a receipt, is that correct? A. Entry in a ledger, or a receipt? Yes, yes.</p> <p>Q. Okay. And -- and so just let's take a year, for example, 1998. I know nothing about it. This is a hypothetical question. If in 1998 I went to all three stores and I added up all the ledger entries, and all the chit -- all the receipt entries, I could find out to the penny how much money the Hameds had withdrawn, and how much money the Yusufs had withdrawn, is that correct?</p> <p>A. That's, yeah, if we could find the records, yes.</p> <p>Q. Yes. And you say that like you are not sure you can find the records.</p> <p>A. Well, the FBI came in and took a lot of our records. It's still held by the District Court.</p> <p>Q. I see. But if you could get those all together and add them up, you could get a number, is that correct?</p> <p>A. Should be able to, yes.</p> <p>Q. Okay. And to the best of your knowledge, all of those receipts still exist today from 1986 on?</p> <p>A. No.</p> <p>Q. Okay. Why don't you tell me about that?</p> <p>A. About what?</p> <p>Q. Why -- why some of them don't exist?</p> <p>A. Should I explain -- that would explain the 1.6 that we have here on the letter.</p> <p>Q. I'll get there, I swear. I just want to -- right now, I just want to know, I asked you if I could go around and collect all these receipts, add them up and find out how much the Hameds took out, and how</p>	2018-01-30
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			<p>much the Yusufs. You said yes. And I said, So I should be able to do that from the -- from back till now, and you said, no, there's a problem. You said some might be in the possession of a third party.</p> <p>A. Right.</p> <p>Q. When I have those from the third party, will I then be able to get that number? A. To physically check every receipt by receipt? Q. Through all the –</p> <p>A. There's -- there's some receipt was destroyed by Waleed Hamed, and some receipts were destroyed by me.</p> <p>Q. Okay. Tell me about that.</p> <p>explain in detail, including (but not limited to) reference to any applicable documents, dates, conversations, to whom (or what entity) the amounts are owed, witnesses, how it is possible to have a complete accounting of the ledgers when some transactions were included in ledgers, but others in receipts ("there would have either been an entry in a ledger, or a receipt ") and some of those ledgers or receipts were intentionally destroyed?</p>	
Y-007	Doc Prod	32	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 7</p> <p>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.</p>	1/29/2018
Y-007	Admit	5	<p>Request to admit number 5 of 50 relates to Claim Y-7 – as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Ledger Balances Owed United."</p> <p>Admit or deny that the claims listed in Exhibit H to Yusuf's Original Claims, Ledger Sheets Reflecting United's Payments for Plaza Extra, except for one transaction for \$3000, occurred in 1995 or earlier, and occurred more than six years before the FBI seized the document.</p>	1/29/2018
Y-008	Interrog	2	<p>Water Revenue Owed United</p> <p>Describe in detail, by month, from Sept 17, 2006 to 2014, the amount of water sold to the Partnership, by whom it was sold, the number of gallons per month, the per gallon cost in each of those months, the total value of the gallons sold by month, year and total amount -- and describe any ledgers, shipping invoices, receipts or other documents which support your claim as well as any witnesses who would have knowledge and what knowledge you believe they have.</p>	2018-01-30
Y-008	Doc Prod	33	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 8</p> <p>For any allocation set forth in Exhibits 1-5, please produce all underlying documents relating to any such allocation.</p>	1/29/2018

Y-008	Admit	35	Substantially the same as Yusuf RTA #8 Admit that Yusuf was in charge of coordinating all of the financials of the Partnership in its relations with United -- including rents.	1/29/2018
Y-009	Doc Prod	34	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.	1/29/2018
Y-009	Admit	6	Request to admit number 6 of 50 relates to Claim Y-9 as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as " Unreimbursed Transfers from United. " Admit or deny that the claims listed in Exhibit I to Yusuf's Original Claims, Summary and Supporting Documentation of Unreimbursed Transfers from United, occurred in 1996, and occurred more than six years before the FBI seized the document.	1/29/2018
Y-010	Interrog	42	Beginning at page 54 and running through this deposition testimony there is reference to \$1.6 million ("the \$1.6 million") that Yusuf/United assert is owed to either United or Yusuf by the Hameds as set forth in Maher Yusuf Deposition Exhibit 144 (attached to Exhibit A), Bates numbered HAMD200103, dated August 15th, 2012. Explain in detail, including (but not limited to) reference to any applicable documents, dates, conversations, to whom (or what entity) the amounts are owed, witnesses, what stores or business operations that \$1.6 million relates to and, in full and similar levels of detail, which stores or business operations it does not relate to. Include but do not limit this to a discussion of all underlying documents used for the calculations and the calculations at to which amounts are ascribable to which stores.	2018-01-30

Y-010	Interrog	43	<p>Keeping in mind that Maher Yusuf's testimony, most clearly at pages 67-68, is that some of the receipts that were added to "calculate" \$1.6 million figure were intentionally destroyed by Maher Yusuf and others in anticipation of an FBI raid.</p> <p>Q. Okay. So what was in the 1.6? You don't know, because they're all destroyed? A. The receipts. The receipts similar to the ones I'm showing you here. Q. I know, but the actual ones that you say added up to this 1.6, they're gone. A. Right. Q. Okay. A. To this figure, yes. Yes.</p> <p>Explain in detail, including (but not limited to) reference to any applicable documents, dates, conversations, to whom (or what entity) the amounts are owed, witnesses, whether amounts that might have been due to Hamed at that exact same point in time, from the other stores, were included in this \$1.6 million calculation. Include, but do not limit this to how the \$1.6 million due for West is an accurate accounting of the total amount Hamed owed (or was owed) at that time or how admitting that \$1.6 million owed with regard to that one, East store is an admission to the full amount owed either way at that time -- further explaining his testimony at 69-70:</p> <p>Q. But when this -- when this math was done, you didn't go and get the receipts from St. Thomas, right? A. No. Q. So in St. Thomas, for instance, it could be the Yusufs owe Hameds \$10 million, for all you know. A. (Witness indicating). Q. Right? A. Could be whatever it could be. I don't know. Q. Yeah. Okay. And in the West store, since those weren't collected when you did this letter, -- A. Correct. Q. -- again, the Yusufs could -- take a different number -- the Yusufs could owe the -- the Hameds \$1,241,386.42, couldn't they? A. Whatever.</p>	2018-01-30
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Y-010	Interrog	44	<p>Keeping in mind that Maher Yusuf was testifying for United (as its President) in this deposition (it is captioned "30(B)(6) OF UNITED CORP. - MAHER "MIKE" YUSUF) and that Maher Yusuf's testimony, most clearly at pages 73-75, is that the receipts that were added to "calculate" \$1.6 million figure and in the Black Books and ledgers were not between Hamed and united, but rather between the Hameds and the Yusufs -- correcting amounts in the supermarket partnership, not with United.</p> <p>Q. (Mr. Hartmann) Okay. And I now am going to show you an Exhibit numbered 149, which is Bates numbered at the upper right-hand corner, HAMD200105, and is a letter addressed on United Corporation stationery to Mr. Mohammad Hamed on August 22nd, 2012 from Fathi Yusuf. Did -- did Fathi Yusuf draw up this letter, or did you?</p> <p>A. I don't recall if it was me, or me and him, or me alone. I -- I -- I don't -- I don't remember.</p> <p>Q. Okay. But both of these letters were sent from Fathi Yusuf, right?</p> <p>A. Yes</p> <p>Q. Okay. As a matter of fact, let's look at -- at 144. That's the one with the math on it, or 146, whichever you want.</p> <p>A. Okay</p> <p>Q. Yeah, it's the same one. What does the signature on 144 or 146 say? Whose signature is that?</p> <p>A. That's my signa --</p> <p>Q. You recognize it?</p> <p>A. -- my signature.</p> <p>Q. Your signature. But it says, For the Fathi Yusuf, right?</p> <p>A. Right.</p> <p>Q. Why would Fathi Yusuf -- you were the president, right, of United?</p> <p>A. Yes</p> <p>Q. And -- and these were not adjustments for United Corporation, these were adjustments for Plaza Extra Supermarkets, is that correct?</p> <p>A. Yes.</p> <p>Q. Is that why Fathi Yusuf's name appears on all three of these, because these are partnership reconciliations?</p> <p>A. Yes. It's for -- it's withdrawals from the store.</p> <p>Q. Okay</p> <p>A. I mean, what's so hard in that?</p> <p>Q. Nothing.</p> <p>explain in detail, including reference to the phrases "these were not adjustments for United Corporation" but were "partnership reconciliations", any applicable documents, dates, conversations, to whom (or what entity) the amounts are owed, witnesses, to what person or entity United and Mike Yusuf as its President understood the claims against Hamed were owed on April 3, 2014 and if, how and why that has since changed.</p>	2018-01-30
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Y-010	Doc Prod	22	<p>Request for the Production of Documents, 22 of 50, relates to Y-10, “Past Pship Withdrawals – Receipts.”</p> <p>With respect to Y-10, please provide all documents demonstrating a reconciliation of the Plaza Extra West and St. Thomas stores receipts occurring at the same time as the Plaza Extra East reconciliation, as referenced as “[a]mount owed by Hamed family to Yusuf as per agreement before raid Sept 2001. As per Mike’s testimony these tickets were burned ([r]efer to Letter dated August 15, 2012)” in the revised BDO Exhibit J-2, attached to Yusuf’s Amended Accounting Claims Limited to Transactions Occurring On or After September 17, 2001, filed on October 30, 2017.</p>	1/29/2018
Y-010	Doc Prod	23	<p>Request for the Production of Documents, 23 of 50, relates to Y-10, “Past Pship Withdrawals – Receipts.”</p> <p>With respect to Y-10, please provide all documents substantiating the alleged \$237,352.75 in “[w]ithdrawals from the partnership with a signed ticket/receipt” by Waleed Hamed, as referenced on the revised BDO Exhibit J-2, titled “Summary calculation of Additional Income as a result of withdrawals from Supermarkets’ accounts (or partnership’s accounts) - January 1994 to August 2014. (Including adjustments for withdrawals before 9/17/2006 as instructed by the Court),” attached to Yusuf’s Amended Accounting Claims Limited to Transactions Occurring On or After September 17, 2001, filed on October 30, 2017.</p>	1/29/2018
Y-010	Doc Prod	24	<p>Request for the Production of Documents, 24 of 50, relates to Y-10, “Past Pship Withdrawals – Receipts.”</p> <p>With respect to Y-10, please provide all documents substantiating the alleged \$20,311.00 in “[p]ayments to third parties on behalf of Hamed/Yusuf with partnership funds either with tickets or checks” by Waleed Hamed, as referenced on the revised BDO Exhibit J-2, titled “Summary calculation of Additional Income as a result of withdrawals from Supermarkets’ accounts (or partnership’s accounts) - January 1994 to August 2014. (Including adjustments for withdrawals before 9/17/2006 as instructed by the Court),” attached to Yusuf’s Amended Accounting Claims Limited to Transactions Occurring On or After September 17, 2001, filed on October 30, 2017.</p>	1/29/2018

Y-010	Doc Prod	25	<p>Request for the Production of Documents, 25 of 50, relates to Y-10, "Past Pship Withdrawals – Receipts."</p> <p>With respect to Y-10, please provide all documents substantiating the alleged \$1,778,103.00 in the "[a]mount owed by Hamed family to Yusuf as per agreement before raid Sept 2001. As per Mike's testimony these tickets were burned ([r]efer to Letter dated August 15, 2012)" by Waleed Hamed, as referenced on the revised BDO Exhibit J-2, titled "Summary calculation of Additional Income as a result of withdrawals from Supermarkets' accounts (or partnership's accounts) - January 1994 to August 2014. (Including adjustments for withdrawals before 9/17/2006 as instructed by the Court)," attached to Yusuf's Amended Accounting Claims Limited to Transactions Occurring On or After September 17, 2001, filed on October 30, 2017.</p>	1/29/2018
Y-010	Doc Prod	35	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 10</p> <p>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.</p>	1/29/2018
Y-010	Admit	31	<p>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."</p> <p>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:</p> <p>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.)</p>	1/29/2018
Y-010	Admit	32	<p>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."</p> <p>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</p> <p>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.</p>	1/29/2018

Y-011	Doc Prod	26	<p>Request for the Production of Documents, 26 of 50, relates to Y-11, “Lifestyle Analysis.”</p> <p>With respect to Y-11, please provide all bank account statements documenting deposits, all brokerage and retirement accounts documenting deposits and all credit card statements in the names of Fathi, Maher, Nejeah and Yusuf Yusuf (individually and any combination of joint accounts between them and all joint accounts with their spouses), from September 17, 2006 to September 30, 2016. Include but do not limit this to:</p> <p>All bank account statements documenting deposits or withdrawals All brokerage and retirement account statements documenting deposits or withdrawals All credit card statements</p>	1/29/2018
Y-011	Doc Prod	36	<p>SUBSTANTIALLY THE SAME AS YUSUF RFPD 11</p> <p>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.</p>	1/29/2018
Y-012	Interrog	30	<p>Interrogatory 30 of 50, relates to Y-12: “Foreign Accts and Jordanian Properties.”</p> <p>This interrogatory relates to Claim Y-12: “Foreign Accts and Jordanian Properties.” Please identify all foreign accounts and Jordanian properties that were funded or purchased with funds from the Plaza Extra supermarkets. For each such foreign account individually: include the name of the account, the account number, the name of the institution and its location, the date it was opened, how money generated by the Plaza Extra supermarkets got into the foreign account, the dates deposits and withdrawals were made from each account and the amounts, the date the last transaction on the account occurred, whether the account is active or closed. If open, provide the present balance and if closed, please identify the date the account closed and who closed it. For the Jordanian property, for each property individually please identify (in English) the date it was purchased, the name of the title holder, the property description, who presently owns the property, whether the purchase was in cash or was transferred from a bank, and how all funds generated or provided by the Plaza Extra supermarkets were transferred for the purchase of the property (including amounts and dates of all such transactions).</p>	2018-01-30
Y-014	Interrog	38	<p>Like Yusuf ROG 14.</p> <p>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?</p>	2018-01-30

Y-014	Doc Prod	27	Request for the Production of Documents, 26 of 50, relates to Y-14, " Half of Value of Six Containers. " With respect to Y-14, please provide all documents substantiating your claim, including the itemized pricing and contents of the six containers.	1/29/2018
Y-015	Interrog	39	Like Yusuf ROG 15 What assets were held by Fathi Yusuf and United Corporation as of the date of death of Mohammad Hamed?	2018-01-30
Y-015	Admit	36	Substantially the same as Yusuf RTA #15 Admit that the Partners agreed when the Partnership was formed that all income taxes of Hamed and his children were to be paid from the grocery store operations.	1/29/2018
Y-016	Admit	37	Substantially the same as Yusuf RTA #16 Admit that the Partners agreed when the Partnership was formed that Fathi Yusuf would provide the services and use of United by the Partnership and the Partnership operated the three Plaza Extra Stores that way.	1/29/2018
Y-017	Interrog	40	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?	2018-01-30
Y-017	Admit	38	Substantially the same as Yusuf RTA #17 Admit that no a black book ledger was kept to record amounts due to United, the Partnership, and between the Partners after August of 2006.	1/29/2018
Y-018	Admit	39	Substantially the same as Yusuf RTA #18 Admit that Fathi, Mike, Negeh and Yusuf Yusuf received financial benefit from the failure to report income skimmed from the grocery store operations on United's taxes.	1/29/2018

Y-019	Interrog	41	<p>Substantially the Same as Yusuf ROG 19:</p> <p>Identify all facts and circumstances relating to Yusuf Claims No. 2-5 and 10-12, and identify, all documents relating to each claim.</p> <p>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</p>	2018-01-30
Y-019	Admit	40	<p>Substantially the same as Yusuf RTA #19</p> <p>Admit that Yusuf knew that monies skimmed from the grocery store operations were not being reported to the taxing authorities and nonetheless continued to receive financial gain from the under-reported income.</p>	1/29/2018
Y-020	Admit	41	<p>Substantially the same as Yusuf RTA #20</p> <p>Admit that Yusuf did not report all income he received as a partner in the grocery store operations to the taxing authorities</p>	1/29/2018
Y-021	Admit	42	<p>Substantially the same as Yusuf RTA #21</p> <p>Admit that the Partnership is a separate and distinct legal entity from United and has been for the duration of the Partnership -- and that is solely the Partnership that owned the three Plaza Extra grocery stores, not United</p>	1/29/2018
Y-022	Admit	43	<p>Substantially the same as Yusuf RTA #22</p> <p>Admit that in 2014, Mike Yusuf acknowledged, under oath, that the \$1.6 million Yusuf alleges is due to Yusuf as a result of the accounting true-up of only one operation at that time, and thus, did not show the full accounting at that time.</p>	1/29/2018
Y--023	Admit	44	<p>Substantially the same as Yusuf RTA #23</p> <p>Admit that members of the Yusuf family held assets for Fathi Yusuf which were part of his distributions from the Partnership.</p>	1/29/2018
Z-999	Doc Prod	41	<p>Please produce any and all documents identified in or relating to your responses to Hamed's Interrogatories 42-48 of 50.</p>	1/29/2018

Z-999	Doc Prod	42	<p>Please produce any and all documents identified in or relating to your responses to Hamed's RTAs 46-48 of 50.</p> <p>Hamed's RTA 49 of 50 which asks:</p> <p>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.</p>	1/29/2018
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