

**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

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

Plaintiff,

vs.

UNITED CORPORATION,

Defendant.

Case No.: SX-2014-CV-287

**ACTION FOR DECLARATORY
JUDGMENT**

JURY TRIAL DEMANDED

Consolidated with

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

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

**HAMED'S SIXTH REQUEST
FOR THE PRODUCTION OF DOCUMENTS 48 & 49 OF 50
TO YUSUF PURSUANT TO THE CLAIMS DISCOVERY PLAN OF 1/29/2018**

The following RFPD's pertain to Hamed Claim H-13, and the representations made in the Opposition and surresponse by Yusuf thereto, as discussed in the Special Master's order dated May 8, 2018

RFPD 48 of 50:

Please produce any and all invoices/bills requested in Interrogatory #50, and discussed in your response thereto -- i.e., all bills or invoices or other statements or work done or requests for payment that resulted in the payment of the following amounts to *Fuerst Ittleman David & Joseph, PL*, as the same are described in the Special Master's Order of May 8, 2018,

\$15,067.26 October 19, 2012
\$29,011.50 October 19, 2012
\$99,254.45 November 16, 2012
\$111,660.24 January 21, 2013
\$112,383.32 February 13, 2013
\$82,274.84 March 6, 2013
\$54,938.89 April 3, 2013

Response:

RFPD 49 of 50:

With regard to all work performed that resulted in the payment amounts paid to *Fuerst Ittleman David & Joseph, PL*, as the same are describes in the Special Master's Order of May 8, 2018, to wit,

\$15,067.26 October 19, 2012
\$29,011.50 October 19, 2012
\$99,254.45 November 16, 2012
\$111,660.24 January 21, 2013
\$112,383.32 February 13, 2013
\$82,274.84 March 6, 2013
\$54,938.89 April 3, 2013

As Yusuf and United now claim that some or all of this work was done "for the Partnership" or "for the Partnership under the umbrella of United" and not for Yusuf personally or United as a distinct entity; no privilege attaches to such work. Therefore, supply the following: (1) all written correspondence (including emails) from or to Fuerst Ittleman David & Joseph, PL, its attorneys or staff as to all work performed that was "for the Partnership" or "for the Partnership under the umbrella of United", (2) all notations, notes, drafts, attorney work product or other writings created by Fuerst Ittleman David & Joseph, PL, its attorneys or staff for such "Partnership" charges (this would include any files or other writings transferred to the Dudley Firm), and (3) all other physical evidence in the possession of DTF, Yusuf or United as to the nature and production of that work. (Note: You need not provide any such documents previously provided to Hamed.)

Dated: May 8, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of May, 2018, I served a copy of the foregoing by email (CaseAnywhere ECF), as agreed by the parties, on:

Hon. Edgar Ross
Special Master
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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

This document complies with the page or word limitation set forth in Rule 6-1(e).

