

**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,

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

vs.

UNITED CORPORATION, *Defendant.*

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

vs.

FATHI YUSUF, *Defendant.*

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*
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

Consolidated with

Case No.: SX-2014-CV-278

Consolidated with

Case No.: ST-17-CV-384

**PLAINTIFF / COUNTERCLAIM DEFENDANT WALEED HAMED'S
RESPONSES TO FATHI YUSUF'S REQUESTS TO ADMIT 1-23 TO HAMED**

Responses to Requests to Admit:

Yusuf Claims RFA No. 1. Admit that Hamed family members removed money from the safes at the Plaza Extra Stores without creating a written record of the withdrawal.

Hamed Response: Denied.

Yusuf Claims RFA No. 2. Admit that Plaza Extra East occupied Bay 5 between May 1, 1994 and July 31, 2001 for storage of inventory belonging to the Partnership.

Hamed Response: Denied.

But admit that Plaza Extra East stored materials in a portion of Bay 5 for some limited periods of time when it that Bay was vacant, but it as intermittent, and not continuous, between May 1, 1994 and July 31, 2001.

Yusuf Claims RFA No. 3. Admit that the Partnership owes rent to United for its occupancy of Bay 5 for the period between May 1, 1994 and July 31, 2001.

Hamed Response: Denied.

Yusuf Claims RFA No. 4. Admit that the rent for Bay 5 was the square footage multiplied by \$12.00 per foot multiplied by the number of months the space was occupied by Plaza Extra East.

Hamed Response: Denied.

Yusuf Claims RFA No. 5. Admit that the total square footage for Bay 5 is 3,125 feet.

Hamed Response: Hamed cannot truthfully admit or deny. Therefore, pursuant to Rule 36(4)(4), Hamed hereby "states in detail why [he] cannot truthfully admit or deny it." He "assert[s] lack of knowledge or information as a reason for failing to admit or deny. . .[and] that [he] has made reasonable inquiry and that the information [he] knows or can readily obtain is insufficient to enable [him] to admit or deny" **to wit**, (1) he has reviewed available drawings and plans and cannot make the areas therein match the number given. Moreover, (2) he lacks access to the property and therefore cannot measure the premises.

Yusuf Claims RFA No. 6. Admit that the total rent due from the Partnership to United for Bay 5 which remains unpaid is \$271,875.00.

Hamed Response: Denied.

However, it should be noted that if rent had been due, it was waived when Hamed entered into a settlement agreement with regard to the Partnership's use of any of the premises used during such periods by the East Store. Said agreement references the use of whatever premises were used at the Sion Farm location -- and does not restrict its scope to just Bay 1. See, e.g., Check dated February 7, 2012 which states "Item to be Paid - Description: Rent - Sion Farm." Fathi Yusuf Deposition Exhibit 10, HAMD645495. See also, the appended calculation sheet, HAMD591991-HAMD592006, which references "Sion Farm" with no limitation to "Bay 1". Moreover, Hamed knows that Yusuf is in possession of pages from the United Accounts Receivable (labeled "A/R") ledger during that period showing (i) no rent due for the covered period and, more importantly, (ii) no "balance forward". See e.g., FBIX339272-FBIX339301. Both of these documents are "documentary evidence to refute that the total rent due from the Partnership to United for Bay 5 which remains unpaid is \$271,875.00."

Yusuf Claims RFA No. 7. Admit that you have no documentary evidence to refute that the total rent due from the Partnership to United for Bay 5 which remains unpaid is \$271,875.00.

Hamed Response: Denied.

Yusuf Claims RFA No. 8. Admit that Yusuf was in charge of coordinating all of the rent payments from the Partnership to United for use of space by the Partnership in the operation of the grocery store at Plaza Extra East.

Hamed Response: Denied.

Yusuf Claims RFA No. 9. Admit that Plaza Extra East occupied Bay 8 between May 1, 1994 and September 30, 2002 for storage of inventory belonging to the Partnership.

Hamed Response: Denied.

But admit that Plaza Extra East stored materials in a portion of Bay 5 for some limited periods of time when it that Bay was vacant, but it was intermittent, not continuous, between May 1, 1994 and July 31, 2001.

Yusuf Claims RFA No. 10. Admit that Plaza Extra East occupied Bay 8 between April 1, 2008 and May 30, 2013 for storage of inventory belonging to the Partnership.

Hamed Response: Denied.

But admit that Plaza Extra East stored materials in a portion of Bay 5 for some limited periods of time when it that Bay was vacant, but it was intermittent, and not continuous, between April 1, 2008 and May 30, 2013.

Yusuf Claims RFA No. 11. Admit that the rent for Bay 8 was the square footage multiplied by \$6.15 per foot multiplied by the number of months the space was occupied by Plaza Extra East.

Hamed Response: Denied.

Yusuf Claims RFA No. 12. Admit that the total square footage for Bay 8 is 6,250 feet.

Hamed Response: Hamed cannot truthfully admit or deny. Therefore, pursuant to Rule 36(4)(4), Hamed hereby "states in detail why [he] cannot truthfully admit or deny it." He "assert[s] lack of knowledge or information as a reason for failing to admit or deny. . .[and] that [he] has made reasonable inquiry and that the information [he] knows or can readily obtain is insufficient to enable [him] to admit or deny" **to wit**, (1) he has reviewed available drawings and plans and cannot make the areas therein match the number given. Moreover, (2) he lacks access to the property and therefore cannot measure the premises.

Yusuf Claims RFA No. 13. Admit that the total rent due from the Partnership to United for Bay 8 which remains unpaid is \$323,515.63 for the period of May 1, 1994 to September 30, 2002 and \$198,593.75 for the period of April 1, 2008 to May 30, 2013.

Hamed Response: Denied.

Yusuf Claims RFA No. 14. Admit that you have no documentary evidence to refute that the total rent due from the Partnership to United for Bay 8 which remains unpaid is \$323,515.63 for the period of May 1, 1994 to September 30, 2002 and \$198,593.75 for the period of April 1, 2008 to May 30, 2013.

Hamed Response: Denied.

It should be noted and Hamed admits that if rent had been due, it was waived when Hamed entered into a settlement agreement with regard to the Partnership's use of any of the premises used during such periods by the East Store. Said agreement references the use of whatever premises were used at the Sion Farm location -- and does not restrict its scope to just Bay 1. Moreover, Hamed knows that Yusuf is in possession of pages from the United Accounts Receivable ledger (labeled "A/R") during that period showing (i) no rent due for the covered period and, more importantly, (ii) no "balance forward". See e.g., FBIX339272-FBIX339301. Both of these documents are "documentary evidence to refute that the total rent due from the Partnership to United for Bay 5 which remains unpaid is \$271,875.00."

Yusuf Claims RFA No. 15. Admit that the Partners agreed when the Partnership was formed that income taxes of the United shareholders were to be paid from the grocery store operations.

Hamed Response: Denied.

The Partners agreed when the Partnership was formed that all income taxes of the United shareholders *ascribable to partnership operation, but not those of unrelated United businesses*, were to be paid from the grocery store operations

Yusuf Claims RFA No. 16. Admit that the Partners agreed when the Partnership was formed that United's gross receipts taxes were to be paid by the Partnership.

Hamed Response: Denied

Hamed admits that the Partners agreed when the Partnership was formed that all gross receipts of United *ascribable to partnership operation, but not those of unrelated United businesses* were to be paid from the grocery store operations.

Yusuf Claims RFA No. 17. Admit that a black book ledger was kept to record amounts due to United, the Partnership, and between the Partners.

Hamed Response: Denied.

Hamed admits that:

1. Prior to September 17, 2006, ledgers, receipts and other forms of notation were kept, differently at different locations -- for those different locations, to record amounts due from and to the Partners. Many of these were lost or intentionally destroyed.

2. No such record amounts were kept after September 17, 2006.

Yusuf Claims RFA No. 18. Admit that Mohammad Hamed, Waleed Hamed, Waheed Hamed, Hisham Hamed and Mufeed Hamed received financial benefit from the failure to report income from the grocery store operations on United's taxes.

Hamed Response: Denied with regard to all dates after September 17, 2006.

Hamed objects to inquiry into all dates prior to September 17, 2006 for the following reasons. (1) Judge Brady entered a protective order as to all PARTNERSHIP transactions prior to September 17, 2006. (2) this inquiry asks about income from "from the grocery

store operations". (3) This relates solely to a partnership claim, United has made no claim for repayment of any such taxes.

Notwithstanding this objection, Hamed admits the following:

1. The listed Hameds did receive income from "grocery store operations" of the partnership. The Court has determined and Yusuf/United have stipulated, this was income from the Partnership which ran the stores, not from United.

2. The listed Hameds did not report "grocery store operations" income on United tax returns.

3. In addition, the Yusufs did not report some income from "grocery store operations" on contemporaneous tax returns.

4. The listed Hameds eventually settled these claims and agreed to pay amounts in lieu of those taxes for those periods as the result of a settlement with the government.

5. At least two of the listed Hameds were not reimbursed for such payments from partnership funds as were all of the Yusufs.

6. The partnership did not pay any individual taxes for Hamed non-partnership income, but did so for Yusuf and his children.

Yusuf Claims RFA No. 19. Admit that Hamed knew that monies generated 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.

Hamed Response: Hamed cannot truthfully admit or deny. Therefore, pursuant to Rule 36(4)(4), Hamed hereby "states in detail why [he] cannot truthfully admit or deny it." He "assert[s] lack of knowledge or information as a reason for failing to admit or deny. . .[and] that [he] has made reasonable inquiry and that the information [he] knows or can readily obtain is insufficient to enable [him] to admit or deny" **to wit**, (1) Mohammad Hamed is deceased and cannot be asked and (2) when Yusuf and United deposed Hamed they

knew he was in failing health, could have inquired into this, did not inquire into this, and no other deposition or other testimony is known to Hamed on this subject.

Notwithstanding the foregoing statements, to clarify Hamed notes the following.

1. Hamed will not dispute that "monies generated from the grocery store operations were not being reported to the taxing authorities" and that both Yusuf's and Hamed's sons "receive[d] financial gain from the under-reported income."

Yusuf Claims RFA No. 20. Admit that Hamed did not report income he received as a partner in the grocery store operations to the taxing authorities.

Hamed Response: Hamed cannot truthfully admit or deny. Therefore, pursuant to Rule 36(4)(4), Hamed hereby "states in detail why [he] cannot truthfully admit or deny it." He "assert[s] lack of knowledge or information as a reason for failing to admit or deny. . .[and] that [he] has made reasonable inquiry and that the information [he] knows or can readily obtain is insufficient to enable [him] to admit or deny" **to wit**, (1) Mohammad Hamed is deceased and cannot be asked, and (2) when Yusuf and United deposed Hamed they knew he was in failing health, could have inquired into this, did not inquire into this, and no other deposition or other testimony is known to Hamed on this subject.

Notwithstanding the foregoing statements, to clarify, Hamed admits the following.

1. Hamed will not dispute that "members of the Hamed family who are defendants here did not report [all] income [they] received [from Hamed's share of] grocery store operations to the taxing authorities.

Yusuf Claims RFA No. 21. Admit that the Partnership operated under the umbrella of United for the duration of the Partnership.

Hamed Response: Denied.

Hamed admits the following.

1. There is no legal definition of the term "operated under the umbrella" and that term was never used by Hamed or Yusuf to describe the Partnership or how the Partnership utilized United.

2. The Court has found these facts and entered summary judgment: Hamed was a partner. Yusuf was a partner. United was Yusuf's corporation. Yusuf used United as his agent to perform some of the operations of the partnership. Similarly, Hamed used his son Waleed as his agent to perform some of the operations of the partnership. This did not make United or Waleed in any way an owner or principal of the Partnership. United was just provided by Yusuf in this capacity -- as a shell -- a use provided by one of the Partners.

The Court has also found exactly what Yusuf has stated repeatedly--Yusuf put it perfectly: "But I want you please to be aware that my **partner's** with me since 1984, and up to now **his name is not in my corporation**. And that -- excuse me and that prove my honesty. Because if I was not honest, my brother-in-law will not let me control his 50 percent. And I know very well, my wife knows, my children knows, that **whatever Plaza Extra [the Partnership] owns in assets, in receivable or payable, we have a 50 percent partner.**"

Thus, the partners' original agreement was to carry out the purpose of the partnership agreement with Yusuf, as one of the partners, agreeing to utilize his corporation to do some things for the Partnership as his agent. He could have contributed these facilities otherwise, but did so via United. See e.g. *Sheridan Healthcorp, Inc. v. Amko*, 993 So.2d 167, 170-171 (Fla.App. 4 Dist. 2008).

The trial court determined that the breach of fiduciary duty claim failed because the joint venture had accomplished its purpose, namely to create a corporation to be the legal entity to contract with NBHD to provide emergency room surgery services. Both the court and Dr. Amko rely on the statements in Dr. Triana's complaint and various pleadings to support the notion that the common purpose was to create the corporation. However, a review of the complaint, as well as the other filings, shows that Dr. Triana contends that

the joint venture was formed to provide emergency room surgical services to NBHD and to do it through a corporation and related contracts with that corporation.

This is not a distinction without a difference. A joint venture is similar to a partnership and is, in fact, "governed by the principles which constitute and control the law of partnership." *Kislak v. Kreedian*, 95 So.2d 510, 515 (Fla.1957) (quoting *Proctor v. Hearne*, 100 Fla. 1180, 131 So. 173, 176 (1930)). A joint venture terminates when the objects of its creation have been accomplished. *Id.* at 514. As explained by our supreme court in *Donahue v. Davis*, 68 So.2d 163, 171 (Fla.1953): "**The fact that joint adventurers may determine to carry out the purpose of the agreement through the medium of a corporation does not change the essential nature of the relationship.**" (Emphasis supplied).

See also *Granik v. Perry*, 418 F.2d 832, 836-837 (C.A.Fla. 1969) ("The fact that joint adventurers may determine to carry out the purpose of the agreement through the medium of a corporation does not change the essential nature of the relationship"); *Jolin v. Oster*, 44 Wis.2d 623, 172 N.W.2d 12 (1970) (corporation was vehicle for conducting the business of a continuing partnership -- and could be used as a means of conducting business of joint venture) and *McDonald v. McDonald*, 53 Wis.2d 371, 379-381, 192 N.W.2d 903, 907 - 908 (Wis. 1972).

We find no basis for applying the doctrine of estoppel or laches. There was nothing inconsistent in the action of Chester, Jr., in partaking of the activities of the corporation over the years which would now foreclose him from asserting the corporation was an instrumentality by which the partnership carried on part of its *381 business. If the corporation is to be an instrumentality, it should be operated like a corporation but it must promote the partnership purposes. The record shows much more could have been done to operate the corporation as a corporation should be operated, especially in the lifetime of McDonald, Sr. This failure is some evidence of the intent of the parties, although complete compliance with corporate laws would not necessarily mean the corporation was not the formal instrumentality of the partnership.

Yusuf Claims RFA No. 22. Admit that in 2013, Mohammad Hamed acknowledged, under oath, that he and his family owed \$1.6 million to Yusuf as a result of a partial true-up between the Hamed and Yusuf families and that said amount remained outstanding as of September 17, 2006?

Hamed Response: Denied.

Hamed admits and accurately stated in Plaintiff's Response to Defendant United's First Set of Interrogatories to Plaintiff Hamed, December 23, 2013, *Hamed v Yusuf*, 12-SX-CV-370, as follows:

Describe in detail what objections you have to the accounting provided to you by Fathi Yusuf regarding the \$2.7 million dollars amount that was withdrawn by United Corporation in August of 2013 as an offset to your previous withdrawals and identify all persons with knowledge of any such facts and all documents which support your answer to this interrogatory.

Hamed Response: There are multiple problems with this accounting, which was recently supplied to my lawyers after repeated requests that it be provided. While this investigation and review continues, which will be the subject of an expert accounting report, several problems have already been noted.

First, it states that \$1.6 million was due and owing at the time of the removal of the \$2.7 million. That claim is time barred. Moreover, while it is true that in 1999 Mafi Hamed and Maher Yusuf met and reconciled the outstanding chits related to 50/50 distribution of the Sion Farm grocery store profits, showing \$1.6 million was due to the Yusufs to "true up" the differences in the 50/50 profit withdrawals at that time for that store, **there are other off-sets to that amount. For example, there were amounts to "true up" form the other stores as well.** Likewise, after that time, Fathi Yusuf and his sons took funds that were required to be offset against that amount, as he well knows. . . .(Emphasis added.)

What Mohammad Hamed stated, at page 102-103 of his 3/31-4/1, **2014** deposition was:

In.9 Q. (Mr. Hodges) And as I understand it, as of today,
In.10 you -- you are still not aware of the facts and
In.11 circumstances surrounding the \$1.6 million that's referenced
In.12 in Exhibit No. 3, is that right?
In.13 MR. HARTMANN: Object. Asked and answered.
In.14 MR. HODGES: Show him the letter while
In.15 you're --
In.16 THE INTERPRETER: This one?
In.17 MR. HODGES: No, the 1.6.
In.18 THE INTERPRETER: Right.
In.19 MR. HODGES: You want me to ask the question
In.20 again?
In.21 THE INTERPRETER: Please.
* * *

In.3 Q. (Mr. Hodges) Okay. If you would point out the
In.4 1.6 million on Exhibit 3? And the -- the words to the
In.5 left -- left of it, Past confirmed withdrawal?
In.6 **Okay. So, Mr. Hamed, as -- as you're sitting**
In.7 **here today, you are not aware of any of the facts**
In.8 **surrounding the, quote, Past confirmed withdrawals of**
In.9 **\$1.6 million, is that correct?**
In.10 MR. HARTMANN: Object. Asked and answered.
In.11 THE INTERPRETER: Okay.
In.12 **He says no.**
In.13 MR. HODGES: Okay. I guess that's a good
In.14 time to break, then. (Emphasis added.)

This was just one small part of the relationship between the parties was partially accounted at one time -- it was incomplete. Mike Yusuf testified at length that this was \$1.6 million number NOT all of the stores at that time, and not all of the accounts. It was just one facet of various claims between the Yusufs (not United) and the Hameds at that time. **To get what was "owed" as an effect of ALL ACCOUNTS at that time, one would have to know the similar amounts from the other operations at the same time.**

Yusuf Claims RFA No. 23. Admit that members of the Hamed family held assets for Mohammad Hamed which were part of his distributions from the Partnership?

Hamed Response: Denied.

Dated: May 15, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2018, I served a copy of the foregoing by email (via CaseAnywhere), 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).



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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

Consolidated with

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

vs.

FATHI YUSUF, *Defendant.*

Case No.: SX-2014-CV-278

Consolidated with

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*

Defendants.

Case No.: ST-17-CV-384

**PLAINTIFF/COUNTERCLAIM DEFENDANT WALEED HAMED'S
RESPONSES TO FATHI YUSUF'S REQUESTS TO PRODUCE 1-20 TO HAMED**

Objection to all of the following:

This discovery is limited to the Revised Claims set forth by the parties pursuant to the direction of the Special Master. All discovery must, therefore, relate to or be calculated to lead to discoverable evidence as to one of the Claims set forth. Yusuf does not identify the claims to which inquiries relate -- and many do not relate to any of the remaining *Revised Claims*. Hamed answers all requests subject to this objection. (In Hamed's discovery each item is related to the specific claim.) No documents withheld.

RFPD 1. For every asset, identified in response to Interrogatory No. 1, produce all documents relating to same from September 17, 2006 to present.

Response: Object: (1) overly broad, (2) not related to any claim as this appears to be a renewed effort to resurrect the "lifestyle" analysis that Judge Brady rejected. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24.

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts(Emphasis added.)

In addition (3) Hamed does not have his bank records for the date September 17, 2006 -
- and records he has "as of the date of these responses" is irrelevant. (4) The request
is oppressive and (5) overburdensome. Subject to those objections, Hamed states:**

A. Property outside of the USVI

Hamed owns certain parcels of land either individually or with Fathi Yusuf in Jordan. Hamed objects to listing these individually as: (1) Yusuf has full and equal knowledge as to them, (2) they are outside of the jurisdiction of this Court and objections have been filed here on that basis. Subject to that, If Yusuf will pay for the title search, Hamed will have a title company in Jordan supply a list of all properties owned.

B. Property in the USVI

Hamed's widow and the Hamed sons own the property on which their houses are located. Mr. Hamed also had small holdings of land worth less than \$250,000. Waleed Hamed also owns an apartment duplex in Carlton on St. Croix, purchased sometime around 1987. However, although **this question was not asked**, in the interest of full disclosure, the Hameds own stock in several companies, all known to Yusuf and United. All such properties are listed in the records of the Recorder of Deeds for the US Virgin Islands under the respective company names. Though the request does not inquire as to those properties, if Yusuf will pay for the title search, Hamed will have a USVI title company supply a list of all properties owned by such corporate entities -- or depositions or subpoenae can be issued to said companies by Yusuf.

C. Stocks Outside of Investment Accounts

Hamed (or his Trust or Estate) along with his family members owns 50% of the stock of several USVI entities along with Yusuf of members of his family. None have been removed from the Trust/Estate since his death or encumbered in any way. These are all known to Yusuf. In addition, the Hamed sons own shares in several corporations

** No documents were withheld based on the objections raised.

unrelated to this litigation and which compete with Yusuf. In addition, also known to Yusuf, are shares in KAC357 Inc. which owns the leases of the stores obtained from the partnership. If a motion to compel this information is made, a motion for a protective order will be filed as a trade secret unrelated to the litigation.

D. Bank and Brokerage Accounts

Hamed owns no more bank accounts as he is deceased. As for the older bank accounts of Hamed and his sons, Yusuf obtained the account numbers and records previously, served subpoenae and obtained the documents requested. Hamed and his sons have no such records, other than what was gathered by the FBI as part of the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15), which is equally available to Yusuf, before the current ones, which are irrelevant.

Yusuf's accountant (BDO) has testified by expert report that older bank records are not available. Subject to that (and the footnote), out of an abundance of caution, the Hameds list the following accounts, but do not know whether any of these accounts were transacted on or after September 17, 2006. Further, Wally Hamed's Cairo Amman bank statements for account numbers 02/501/171878/00 and 02/533/171878 were sent to Fathi Yusuf at the Tutu Park Plaza Extra location, St. Thomas, so he would be in the best position to know that status of those accounts and both of Wally Hamed Banque Francaise Commercial accounts were sent to Isam Yousuf in Sint-Maarten.

Wally Hamed

Banco Popular – 194-602753

Banco Popular – 194-038515

Banco Popular – 191-716286

Banco Popular – 194-602753

Core States, First Pennsylvania Bank – 11150056080

Scotiabank – 5800308313

Virgin Islands Community Bank – 182605817

Virgin Islands Community Bank – 182556086

Merrill Lynch – 140-16184

Merrill Lynch – 140-82626

Merrill Lynch – 140-85240

Prudential Bache-Securities – 050-130830-2

Banque Francaise Commerciale – 40-60-63878-90

Banque Francaise Commerciale – 40-60-63878-91

Bellevue Abriere Guichet – 60638789040

Cairo Amman Bank - 02/501/171878/00

Cairo Amman Bank – 02/533/171878

Cairo Amman Bank – 6101863

Willie Hamed

Banco Popular – 594178865

Chase – 721-1-047688

Scotiabank – 2068417

Scotiabank – 55002244

Scotiabank – 55034622

Prudential Bache – 08-3640-022

Raymond James – 10221124

Raymond James – 10230982

Raymond James – 50245929

Raymond James – 50245934

Raymond James – 71962008

Raymond James – 71962013

Raymond James – 72946098

Mafi Hamed

Banco Popular – 191-045535

Banco Popular – 591-416998

Ideal – 191-045535

Scotiabank – 058-00119415

Scotiabank – 45609811

Merrill Lynch – 140-19156

Shawn Hamed

Banco Popular – 191-185515

Scotiabank – 044-55152125

Scotiabank – 60829213

Charles Schwab – 4062-0039

Morgan Keegan & Company – 76316041

Morgan Keegan & Company – 61009668

Popular Securities – PSP-021644

Raymond James – 10207203

TD Ameritrade – 788-441834

TD Ameritrade – 788-441996

Wally, Willie, Mafi and Shawn Hamed

Scotiabank – 92032496

Wally and Mafi Hamed

Scotiabank – 058- 45609811

Shawn and Willie Hamed

Charles Schwab – 4101-9260

Mafi and Amal Hamed

Banco Popular 191-045535

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 2. Please produce any and all financial statements for Hamed, Waleed, Waheed, Mufeed and Hisham submitted to any person or institution from September 17, 2006 to present.

Response: Object: (1) overly broad, (2) not related to any claim as this appears to be a renewed effort to resurrect the "lifestyle" analysis that Judge Brady rejected. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24.

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts(Emphasis added.)

In addition (3) Hamed does not have his bank records for the date September 17, 2006 -- and records he has "as of the date of these responses" is irrelevant. (4) The request is oppressive and (5) overburdensome.

RFPD 3. Please produce all documents relating to water sales from Plaza Extra East location from April 2004 to March 9, 2015.

Response: Hamed disputes Yusuf's claim regarding Plaza Extra water sales. Yusuf contends that from April 1, 2004, all revenue from the sale of water that was collected by Plaza Extra-East was to be paid to United. The water sales actually did not belong to United, but to the Partnership.

A little background is in order. When the Partnership purchased the one-acre property at Plaza Extra-East, it also built, with Partnership funds, a 400,000 to 450,000 gallon cistern on the property. Additionally, one or two water wells also were used to fill the cistern. This was during the 1990s. At that time, there was a water shortage on island, WAPA had difficulty consistently providing water and, other than WAPA, there really weren't other companies selling water. The Partnership filled this gap by selling water, starting approximately in 1994. Yusuf is correct that during 1994-2004, the proceeds from the sale of the water went to charity (half to Mr. Yusuf's choice of charity and the other half to Mr. Hamed's choice of charity) and to pay the expenses of the water generation and delivery. At its peak, in the 1990s, 10 or more trucks a day, each with a capacity of about 30,000 gallons, delivered water to St. Croix residents.

After April 1, 2004, the funds generated from the enterprise went to the Partnership, rather than to charity. The sale of water dropped off quite dramatically for the Partnership in the 2000s. Competitors, such as Marcos and others, entered the market. To get a sense of the scope, in the 2000s, the Partnership was sending out one or two trucks a day to deliver water, rather than the previous 10 or more trucks.

Eventually, Yusuf Yusuf was in charge of monitoring the water sales. For a time, water sales were recorded on hand written receipts, but there weren't any controls to ensure that the vendors did not take more water than they were billed. Wally Hamed then

recommended, and Yusuf Yusuf implemented, a key being programmed into the register at the service desk to record the sales of water.

Hamed objects to this claim by Yusuf & United for a number of reasons. First, neither United nor Yusuf has provided any document memorializing this so-called agreement between the Partnership and United because one does not exist. Next, Yusuf picks two years of sales, 1997 and 1998, and extrapolates those two years of sales into an average of \$5,291.66 per month and applies that monthly figure to every month from April 1, 2004 through February 28, 2015. As is explained by the chronology, water sales dropped off dramatically in the 2000s, so of course Yusuf picks two years of sales during the most profitable years. Third, Yusuf does not provide any documentation to support the sales for 1997 and 1998, nor does he provide any documentation to support water sales from April 1, 2004 through February 28, 2015, even though both paper copy receipts and information from the register could be generated to show actual sales. Fourth, and perhaps most galling, United doesn't have any right to the water, as it is Partnership water, so this really isn't money United is entitled. Finally, this leads to Hamed's belief that this is another example of what Special Master Ross described as "a transaction prohibited by law and tainted by a conflict of interest and self-dealing," when discussing the inflated rents United tried to collect on Bay 1. Yusuf is not fulfilling his fiduciary duty to the Partnership and instead is trying to loot the Partnership for his corporation, United.

The documents relating to water sales from Plaza Extra East location from April 2004 to March 9, 2015 have been requested from Yusuf and United. These responses will be supplemented when they supply them.

RFPD 4. Please produce copies of any accountings prepared by or on behalf of any member of the Hamed or Yusuf families in the Criminal Case to demonstrate under-reported income?

Response: No such documents were prepared "by" them. As to documents prepared on their behalf: Hamed objects to any efforts to discover such expert material. As to documents prepared on their behalf: On December 1, 2010, F.R.Civ.P. 26 was amended to change the expert disclosure requirements and to limit expert discovery. Under the earlier version of Rule 26(a), experts who were required to prepare a written report¹ were also required to disclose the "facts or other information considered" in forming their expert opinions.² This broad language ("other information" plus "considered") was interpreted so broadly by the district courts that virtually anything "considered, reviewed or generated" by a retained expert became discoverable, regardless of whether the materials were actually relied upon in forming the expert opinions.³

The former language was interpreted to include drafts of expert reports and even "attorney-expert communications that explain the lawyer's concept of the underlying facts, or his view of the opinions expected."⁴ There were few exceptions.⁵ To the federal courts, "other information considered" meant everything under the sun, and counsel and experts went to considerable lengths to protect their communications or avoid them altogether.

The Advisory Committee recognized the problems created by the overly broad scope of Rule 26(a)'s disclosure requirements. The Committee acknowledged that the discoverability of expert-attorney communications has initiated a "guarded attitude" between lawyers and testifying experts and that strategies to protect against expert discovery have increased costs and impeded effective expert communications.⁶ (For example, to avoid discovery of their collaborative discussions, attorneys often employ two sets of experts – one for consultation and the other to prepare Rule 26 disclosures and testify at trial.⁷) By the same token, "experts adopt strategies that protect against discovery but also interfere with their work."⁸

The amendments to Rule 26 were intended to eliminate these problems. Amended Rule 26 replaced the phrase, "facts or other information considered" with "facts or data considered."⁹ The Advisory Committee explained that "the refocus of disclosure on 'facts or data' is meant to limit disclosure to material of a factual nature by excluding theories or mental impressions of counsel."¹⁰ The idea was to create work-product protection for "draft expert disclosures or reports" and "communications between expert witnesses and counsel."¹¹

The amendments also encompassed Section 26(b)(4)(c) which specifically protects communications between reporting experts and attorneys, regardless of the form of the communications, except to the extent the communications:

- (i) relate to compensation for the expert's study or testimony;
- (ii) identify facts or data that the party's attorney provided and that the expert considered in forming the opinions to be expressed; or
- (iii) identify assumptions that the party's attorney provided and that the expert relied on in forming the opinions to be expressed.

The revised version of Rule 26(b)(4)(b) further "protect[s] drafts of any report or disclosure required under Rule 26(a)(2), regardless of the form in which the draft is recorded."

Finally, as per Amended Rule 26(a)(C)(i)-(ii), a formal expert report is no longer necessary for experts not "retained or specially employed to provide expert testimony."¹

¹ Footnotes:

1 Any expert "retained or specially employed to provide expert testimony" or "whose duties as the party's employee regularly involve giving expert testimony" must provide a written report. Fed. R. Civ. P. 26(a)(2)(B).

2 Fed. R. Civ. P. 26(a)(2)(B)(ii) (1993).

3 *Employees Committed for Justice v. Eastman Kodak Co.*, 251 F.R.D. 101, 104 (W.D.N.Y. 2008).

Subject to the above, please see **Attachment A** for a listing of documents responsive to this request.

RFPD 5. Please produce copies of all original tax returns filed by Hamed, Waleed, Waheed, Hisham Hamed and Mufeed from 1986 to date.

Response: Object. Nothing before 2006 is allowed under Judge Brady's order. As to the materials after 2006 Object. (1) overly broad, (2) not related to any claim as this appears to be a renewed effort to resurrect the "lifestyle" analysis that Judge Brady rejected. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, at pages 23-24.

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes "a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various

4 Schwarz & Schwarz of Virginia, L.L.C. v. Certain Underwriters at Lloyd's London Who Subscribed to Policy Number NC959, 2009 WL 1043929, *6 (W.D. Va. 2009) (citing Elm Grove Coal Co. v. Director, O.W.C.P, 480 F.3d 278, 303 (4th Cir. 2007)).

5 See TV-3 Inc. v. Royal Ins. Co. of America, 193 F.R.D. 490, 491 (S.D. Miss. 2000) (holding "other information" means "all communications between counsel and a retained testifying expert, even if those communications contain

the attorneys' mental impressions or trial strategy or is otherwise protected by the work product privilege.").

6 2010 Advisory Committee's Notes to Fed. R. Civ. P. 26.

7 Id.

8 Id.

9 Fed. R. Civ. P. 26(a)(2)(B)(ii) (2010).

10 2010 Advisory Committee's Notes to Fed. R. Civ. P. 26.

11 Id.

periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BOO Rep'tt, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts(Emphasis added.)

Subject to the above, please see ***Attachment A*** for a listing of documents responsive to this request.

RFPD 6. Please produce copies of all documents including statements relating to any operating, savings, credit, investment, trust, escrow or other accounts in which Hamed, Waleed, Waheed, Hisham and Mufeed have or had any interest in the Virgin Islands or elsewhere, including, but not limited to Jordan and West Bank, Palestine, from 1986 to date.

Response: Object. Nothing before 2006 is allowed under Judge Brady's order. As to the materials after 2006 Object. (1) overly broad, (2) not related to any claim as this appears to be a renewed effort to resurrect the "lifestyle" analysis that Judge Brady rejected. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, at Page 23-24.

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes "a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BOO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BOO Rep'tt, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of**

"known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts. Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts(Emphasis added.)

Yusuf's accountant (BDO) has testified by expert report that older bank records are not available. Subject to that and the above objections, out of an abundance of caution, the Hameds list the following accounts:

Wally Hamed

Banco Popular – 194-602753

Banco Popular – 194-038515

Banco Popular – 191-716286

Banco Popular – 194-602753

Core States, First Pennsylvania Bank – 11150056080

Scotiabank – 5800308313

Virgin Islands Community Bank – 182605817

Virgin Islands Community Bank – 182556086

Merrill Lynch – 140-16184

Merrill Lynch – 140-82626

Merrill Lynch – 140-85240

Prudential Bache-Securities – 050-130830-2

Banque Francaise Commerciale – 40-60-63878-90

Banque Francaise Commerciale – 40-60-63878-91

Bellevue Abriere Guichet – 60638789040

Cairo Amman Bank - 02/501/171878/00

Cairo Amman Bank – 02/533/171878

Cairo Amman Bank – 6101863

Willie Hamed

Banco Popular – 594178865

Chase – 721-1-047688

Scotiabank – 2068417

Scotiabank – 55002244

Scotiabank – 55034622

Prudential Bache – 08-3640-022

Raymond James – 10221124

Raymond James – 10230982

Raymond James – 50245929

Raymond James – 50245934

Raymond James – 71962008

Raymond James – 71962013

Raymond James – 72946098

Mafi Hamed

Banco Popular – 191-045535

Banco Popular – 591-416998

Ideal – 191-045535

Scotiabank – 058-00119415

Scotiabank – 45609811

Merrill Lynch – 140-19156

Shawn Hamed

Banco Popular – 191-185515

Scotiabank – 044-55152125

Scotiabank – 60829213

Charles Schwab – 4062-0039

Morgan Keegan & Company – 76316041

Morgan Keegan & Company – 61009668

Popular Securities – PSP-021644

Raymond James – 10207203

TD Ameritrade – 788-441834

TD Ameritrade – 788-441996

Wally, Willie, Mafi and Shawn Hamed

Scotiabank – 92032496

Wally and Mafi Hamed

Scotiabank – 058- 45609811

Shawn and Willie Hamed

Charles Schwab – 4101-9260

Mafi and Amal Hamed

Banco Popular 191-045535

Subject to the above, please see ***Attachment A*** for a listing of documents responsive to this request.

RFPD 7. Please produce all documents relating to all assets of Hamed as of September 12, 2012 and the value of such assets.

Response: Object. All of the assets set forth in the Trust Agreement are listed on the Trust Agreement -- which has been provided. This request for the production of documents attempts to invade the Trust. There are more than sufficient assets in the corporate and real estate holdings of the Trust, which have not changed since the Trust was funded, to pay any potential judgment. Thus, all such inquiries seeking discovery for "fraudulent conveyance" in the consolidated action are premature here.

Subject to this objection, Waleed Hamed states:

1. Into the Trust, Mohammad Hamed placed assets, some of which are listed below, in 2012 -- which listed assets all remain in the Trust, unpledged and unencumbered in any manner:
 - a. 10% of the shares (10 shares) of Plessen Enterprises, Inc.
 - b. 10% of the shares (10 shares) of Sixteen Plus.²
 - c. 50% of the shares (500 shares) of Peters Farm.³
 - d. His personal residence in which Mrs. Hamed is residing.
 - e. Small holdings of land worth less than \$250,000.
2. The value of these above-listed assets is approximately \$9,600,000, calculated as:
 - a. Mohammad Hamed's residence, \$300,000
 - b. Miscellaneous unimproved land in his name, \$200,000
 - c. Stock in Plessen (10 shares = 10%), estimated \$ 2,000,000⁴
(estimated \$20 million value: rent from Plaza West store + other property + \$1.6 million plus in cash)
 - d. Stock in Sixteen Plus (10 shares - 10%), estimated \$1,600,000
(estimated \$16 million land Diamond Keturah)
 - e. Stock in Peter's Farm (500 shares = 50%), estimated \$5,500,000

² The balance of the shares is owned by other Hamed Family Members and Yusuf Family Members. The underlying property cannot be sold or encumbered without the agreement of the Yusufs.

³ The balance of the shares is owned by other Hamed Family Members and Yusuf Family Members. The underlying property cannot be sold or encumbered without the agreement of the Yusufs.

⁴ In addition to the \$1.6 million plus Plessen has in the bank, it takes in more than \$100,000 per month. Out of this, Plessen only pays taxes and other minor amounts -- it has no significant expenses.

(4 properties)

3. In addition, there are Mohammad Hamed claims pending in the action *Hamed v. Yusuf and United*, SX-12-CV-370⁵ against Fathi Yusuf and United Corporation as follows:

- a. One-half of the original \$2.7 million that Judge Brady found that the Yusuf's had stolen from the Partnership,⁶ (See the Court's detailed Memorandum of April 25, 2013, *Hamed v. Yusuf*, 58 V.I. 117, 2013 WL 1846506 (V.I. Super. Apr. 25, 2013)).

⁵ This litigation began in 2012 when Fathi and Mike Yusuf unilaterally took \$2,784,706.25 from a Partnership account and transferred it to an account to which the Hameds did not have access. This was the main issue in Hamed's 2012 complaint and the central issue during the early portion of this case. Yusuf took the position that Hamed had no interest in the Plaza Extra Stores. Based on this, he took \$2.7 million from the Partnership account and also tried to have the police remove the Hameds from the stores. Thus, Judge Brady granted a full evidentiary TRO hearing over two full days -- January 25th and 31st, 2013. Three months later, the Court ruled for Hamed on the matter. (See the Court's detailed Memorandum of April 25, 2013, *Hamed v. Yusuf*, 58 V.I. 117, 2013 WL 1846506 (V.I. Super. Apr. 25, 2013)). The Court stated at paragraphs 35 and 36:

On the first hearing day, Mahar Yusuf, President of United. Corporation testified under oath that he used the \$2,784,706.25 withdrawn from the Plaza Extra operating account to buy three properties on St. Croix in the name of United. On the second hearing day, Mahar Yusuf, contradicted his prior testimony and admitted that those withdrawn funds had actually been used to invest in businesses not owned by United. . . . Id. at *10.

And, further, at footnote 9, at *19:

With regard to the August 2012 diversion of more than \$2.7 million by Mahar Yusuf, president of United, to accounts inaccessible to Plaintiff, a real concern exists that continuing diversions will not be traceable as the Plaza Extra store have had no system of internal controls in existence and, to date accounting for the businesses is not completed beyond June 2012....

⁶ This asset is within the control of the Court here and cannot be realized before that action is decided.

- b. More than \$500,000 dollars Judge Brady found had been wrongfully taken from Partnership accounts to pay for Yusuf's personal lawyer.⁷ See Court's detailed Memorandum of April 25, 2013.
- c. One-half of \$8 million in cash, presently escrowed in a Court-supervised account, which Hamed's share may increase based on the on-going accounting.⁸
- d. Two parcels of land in United's name paid for with Partnership funds and transferred to United without any consideration.⁹
- e. One-half of more than \$26 million in "new" claims listed in a 2016 Expert Report as having been improperly paid or accounted for by Yusuf and United when they controlled accounts from 2012-present.¹⁰ It is also important to note that if EVERY remaining Yusuf Claim were granted against Hamed and none of the other counter-defendants (new claims are no longer allowed), and every one of the Hamed claims for \$26 million were denied, Yusuf's total remaining potential claims are still less than the value of just the enumerated Hamed assets in Trust plus half of Hamed's remaining \$4 million in escrow.

⁷ This asset is within the control of the Court in this action (consolidated) and cannot be realized before the action is decided.

⁸ This asset is within the control of the Court in 370 and cannot be realized before that action is decided.

⁹ This asset is within the control of the Court in 370 and cannot be realized before that action is decided.

¹⁰ This asset is within the control of the Court in 370 and cannot be realized before that action is decided.

ALL REMAINING YUSUF CLAIMS

New Claim Number	Item No. in Original 9/30/2017 Claim Filing	Description	Total Amount of Claim, According to Yusuf
Y-01	Exhibit C	Unpaid rent for Plaza Extra-East Bay 1	DENIED – J. Ross
Y-02	Y's Claims - III.B.2	Unpaid rent for Plaza Extra-East Bays 5 & 8	\$793,984.34
Y-03	Exhibit D	9% interest on rent claims for Bay 1	DENIED – J. Ross
Y-04	Exhibit E	9% interest on rent claims for Bays 5 & 8	\$241,005.18
Y-05	Exhibit F	Reimburse United for Gross Receipt Taxes	\$60,586.96
Y-06	Exhibit G	Black Book Balance Owed United	\$49,997.00
Y-07	Exhibit H	Ledger Balance Owed United	\$199,760.00
Y-08	Y's Claims - III.F	Water Revenue Owed United	\$693,207.46
Y-09	Exhibit I	Unreimbursed Transfers from United	\$188,132.00
Y-10	New	Past Partnership Withdrawals - Receipts	\$3,133,020.88
Y-11	BDO Table	Lifestyle Analysis	DENIED- J. Brady
Y-12	Y's Claims - VI, Exhibits K-O	Foreign Accts and Jordanian Properties	Extra-Jurisdictional
Y-13	Y's Claims - VII, Exhibit P	Loss of going concern value of Plaza West- Integra	\$4,385,000.00
Y-14	Y's Claims - VIII	Half of the value of the six containers	\$210,000.00
Sum of All Remaining Yusuf Claims			\$9,954,693.82

4. Other than the amounts listed above associated with this action, there are no other claims against Mohammad Hamed, the Estate or the Trust.

5. In this, the amount claimed in the January 14, 2013, Amended Counterclaim plus interest -- against all defendants -- is \$7 million¹¹ -- far less than \$9,600,000 plus the \$4,000,000 in cash in the escrow.
6. Of the remaining claims against Mohammad Hamed in that case, the most likely and significant one was by United, for back rents of \$6,974,063.10. It was soundly denied by Special Master Ross, who found, at page 6 (emphasis added):

Thus, the evidence and facts surrounding Yusuf's action through United—terminating the lease with the Partnership at Bay 1, treating the Partnership as a holdover tenant, and raising United's rent significantly higher than the agreed upon rent—demonstrates **a transaction prohibited by law and tainted by a conflict of interest and self-dealing.**

Subject to the above, please see **Attachment A** for a listing of documents responsive to this request.

RFPD 8. For any allocation set forth in Exhibits 1-5 that you dispute, please produce all documents relating to any such allocation.

Response: As a general matter, the BDO tables in Exhibits 1-5 are incorrect, are based on incomplete data, and are – by the admission of Yusuf's own experts – inaccurate and incomplete. See p. 2 and 22 of the BDO Report (emphasis added).

[At 2] **records were prepared in an informal manner.**

[At 22] Our report and the findings included herein have been impacted by the **limitation of the information available** in the Case. Following is a summary of the limitations we encountered during the performance of the engagement.

* * * *

¹¹ At paragraph 155:

Hamed and his agents have obtained in excess of \$7 million of the Plaza Extra Stores' monies under such circumstances that in equity and good conscience they ought not retain and the Hamed Sons participated and aided and abetted in this conduct by accepting funds from the Plaza Extra Stores and, among other things, using them to purchase and improve properties for their own personal benefit.

Accounting records and/or documents (checks registers, bank reconciliations, deposits and disbursements of Supermarkets' accounts) provided in connection with Supermarkets were limited to covering the period from 2002 through 2004, East and West from 2006 through 2012, and Tutu Park from 2009 through 2012.

Accounting records and/or documents provided to us for the periods prior to 2003 are incomplete and limited to bank statements, deposit slips, cancelled checks, check registers, investments and broker statements, cash withdrawal tickets/receipts and cash withdrawal receipt listings. **For example, the retention policy for statements, checks, deposits, credits in Banco Popular de Puerto Rico is seven years; therefore, there is no Bank information available prior to 2007** and electronic transactions do not generate any physical evidence as to regular deposits and/or debits. Information discovered about the case up to August 31, 2014. We only considered information up to December 31, 2012. Transactions after that date were adjusted in our report.

Any monies identified through our analysis in excess of the amount identified from the known sources of income (e.g. salaries, rent income, etc.) **were assumed** to be partnership withdrawals/distributions. With regards to the Hamed family,

The lifestyle analysis is supported by **available information** related to deposits to banks and brokerage accounts and payments to credit cards during the period from January 1994 to December 2012 or until Gaffney was assigned to work with the Supermarkets accounting.

Second, Judge Brady also found the reports lacking in terms of comprehensiveness and he also rejected BDO's purported "lifestyle" analysis. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24.

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts(Emphasis added.)

Finally, Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017).

As a result of those three reasons, Hamed disputes the BDO tables in Exhibits 1-5.

Subject to those objections, Hamed states the following:

Exhibit 1, BDO Tables 1-6:

Table 1 – Hamed objects to Table 1. The \$3 million distributed to Fathi and Fawzia Yusuf were Partnership distributions to them alone. Their affidavits clearly state that the amounts were gifts to Mafi and Shawn Hamed. Nothing in the affidavits suggest that the gifts are partnership distributions from both families. Further, there are no other writings documenting that this was an equal distribution between Hamed and Yusuf. This was solely a Yusuf withdrawal. Moreover, in the Hoda Hamed's divorce proceedings she **describes these as her father's or her property for these same reasons.**

Additionally, Fathi Yusuf withdrew an additional \$1 million for himself at the same time the \$3 million in gifts was drawn. Mr. Yusuf kept that money for his own purposes

and there was no corresponding \$1 million withdrawal for Hamed. See, HAMD248055-HAMD248057.pdf, HAMD200057-HAMD200057.pdf.

Tables 2A-4A, 5A-5B – Hamed objects to Tables 2A-4A,5A-5B. These tables are irrelevant because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 2A-4B, 5A-5B occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the post-2006 scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these tables, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Tables 4A-5B—Hamed objects to Tables 4A-5A, which form the underlying basis for the lifestyle analysis. The "lifestyle analysis" these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which

necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Id. at *24 (emphasis added). Further, all of the Yusuf deposits and charges to credit cards were not accounted for in the BDO report, making the comparisons between the two families' spending inaccurate.¹² Finally, many of the deposits in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Table 6—Hamed objects to Table 6 for all of the reasons given for Tables 1-5.

Exhibit 2, BDO Tables 7-14:

Tables 7A-9B – Hamed objects to Tables 7A-9B. These tables are irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 7A-9B occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for

¹² BDO reported, for example, that Fathi, Maher and Yusuf Yusuf had no spending on credit cards from January 1994 through December 2012 and Nejeah Yusuf only had \$100 in spending during the same time period.

documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Table 10A – Hamed objects to Table 10A as these are attorneys' fees and associated expenses incurred in the joint defense of the criminal case, *United States of America vs. United Corp. et. al.*, in the District Court of the Virgin Islands (St. Thomas Division), Docket No. 1:05-cr-00015. These expenses were not split or attributed to any individual defendant, "rather all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case," according to the affidavit of Gordon C. Rhea:

I, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

1. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:

FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed
WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION

4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.
6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.
7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.
8. Under the Joint Defense Agreement;

- a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.
- b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.
- c. Simply because a bill was 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 place.
- d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.
- e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account.

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf)

Further evidence of this is shown in letters Randall Andreozzi, Esq., wrote on behalf of the United Corporation in 2012-2009 to the federal government, requesting Partnership funds be released on United's behalf. An attorney solely representing Waleed Hamed would not be making requests to the federal government in a criminal case on behalf of the United Corporation and its shareholders. Yusuf's argument that Attorney Andreozzi solely represented Waleed Hamed during the time of the joint defense agreement is absurd.¹³ See, e.g., HAMD562177-HAMD562179.pdf, HAMD562183-

¹³ First, 10A is incomprehensible. What BDO appears to have done on 10A, is target bills from specific attorneys such as Pam Colon or other similar professionals. Thus, in bulk, Colon's bills were excepted. No reference is made to what work she actually did or for whom from any documentation. Beyond the obvious refutation of this by the supplied declaration and the underlying Joint Defense Agreement, Hamed notes that no support is provided in the invoices of such lawyers as to either the work done or for which party it was done. Moreover, in his May 8, 2018 Order, Special Master Ross made it clear that such charges which pre-date the end of the Joint Defense Agreement are Partnership expenses – i.e. DiRuzzo's were allowed without parsing them.

HAMD562185.pdf, HAMD261888-HAMD261892.pdf, HAMD562180-HAMD562182.pdf, HAMD562174-HAMD562176.pdf, HAMD562159-HAMD562166.pdf and HAMD562157-HAMD562158.pdf.

Tables 10B – Hamed does not believe he can contest this table, as it appears that BDO excepted these amounts from the calculations. If that is in error, this response will be supplemented.

Table 11A – Hamed objects to Table 11A. This table is irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 11A occurred prior to September 17, 2006 and thus are not proper claims under the Order. Further, Table 11A demonstrates the incompleteness of the BDO report. For example, BDO's note 2 on Table 11A states "[a]mounts were transferred to Cairo Amman Bank account #250117187800 (account not included on our scope)." Thus, note 2 shows that BDO did not do a true accounting because not all accounts were included and, according to the body of the BDO report, not all records

Thus, the completely unsupported and fanciful pre-May 8, 2018, "assumption" by BDO as to what work Ms. Colon did, for example, underlines the failure of Table 10A. To put this another way, this is not an accounting, it is a "BDO accepts the completely unsupported statement of Fathi Yusuf, in the total absence of underlying documentation, as to who did what – and we might as well have claimed absolutely ANY amount and simply said 'because Fathi said so'." Again, this is not an attempt to provide an accounting via underlying documents, it is an attempt to make a position look like an accounting by dropping in a bunch of numbers based on what Fathi Yusuf "told" BDO, and then having BDO sign.

were available. See p. 2 and 22 of the BDO Report. Put another way, Fathi Yusuf could have taken tens of millions through the Cairo Amman Bank account #250117187800, and it would not show up here. That is not an accounting, it is a one-sided speculative argument.

Table 11B – Same...Hamed does not contest this table, as it appears that BDO excepted these amounts from the calculations. Hamed does not, however, agree with Note 1: “All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney.”

During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is probably inaccurate.

Tables 12A-13C – Hamed objects to Tables 12A-13C, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Also, all of the Yusuf deposits and charges to credit cards were not accounted for in the BDO report, making the comparisons between the two families' spending inaccurate.¹⁴ Finally, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Table 14 – Hamed objects to Table 14 for all of the reasons given for Tables 7A-13C, plus the following: The headings on Table 14 make it difficult to determine which items occurred on or after Judge Brady's September 17, 2006 date for permissible claims. For instance, Table 14 shows "Funds Withdrawn through Partnership Checks" to be \$232,670.00 (BDO Table 7B). All of those withdrawals were prior to 2004, thus none of those withdrawals are applicable to the current claims process. Additionally, Table 14 shows "Withdrawals from the Partnership with a Signed Ticket/Receipt" to be \$273,630.00. All of those withdrawals were prior to 2003 (BDO Table 8B), thus none of those withdrawals are applicable to the current claims process. This amount, presumably in error, was carried over to BDO's revised Table J-2, which Hamed also disputes. Similarly, Table 14 shows "Payments to Third Parties on behalf of Hamed/Yusuf with Partnership Funds Either with Tickets or Checks" to be \$4,130.00. All of those withdrawals were prior to 2003 (BDO Table 9B), thus none of those withdrawals are applicable to the current claims process. This amount somehow jumped from \$4,130.00 to \$20,311.00 on BDO's revised Table J-2, which Hamed disputes.

¹⁴ BDO reported, for example, that Fathi, Maher and Yusuf Yusuf had no spending on credit cards from January 1994 through December 2012 and Nejeah Yusuf only had \$100 in spending during the same time period.

Finally, Table 14 shows "Amount Owed by Hamed Family to Yusuf as per Agreement Before Raid Sept. 2001. As per Mike's Testimony these Tickets were Burned (Refer to Letter dated August 15, 2012)" to be \$1,778,103.00. This amount is disputed and Hamed is unclear where BDO's came up with an amount of \$1,778,103.00. The amount in the letter refers to "Past Confirmed Withdrawals" as \$1,600,000.00, and that is the amount referenced below. See, HAMD200104-HAMD200104.pdf. In any event, Hamed does not owe the \$1.6 or \$1.77 million.

Hamed stated in Plaintiff's Response to Defendant United's First Set of Interrogatories to Plaintiff Hamed, December 23, 2013, *Hamed v Yusuf*, 12-SX-CV-370, as follows:

Describe in detail what objections you have to the accounting provided to you by Fathi Yusuf regarding the \$2.7 million dollars amount that was withdrawn by United Corporation in August of 2013 as an offset to your previous withdrawals and identify all persons with knowledge of any such facts and all documents which support your answer to this interrogatory.

Hamed Response: There are multiple problems with this accounting, which was recently supplied to my lawyers after repeated requests that it be provided. While this investigation and review continues, which will be the subject of an expert accounting report, several problems have already been noted.

First, it states that \$1.6 million was due and owing at the time of the removal of the \$2.7 million. That claim is time barred. Moreover, while it is true that in 1999 Mafi Hamed and Maher Yusuf met and reconciled the outstanding chits related to 50/50 distribution of the Sion Farm grocery store profits, showing \$1.6 million was due to the Yusufs to "true up" the differences in the 50/50 profit withdrawals at that time for that store, **there are other offsets to that amount. For example, there were amounts to "true up" from the other stores as well.** Likewise, after that time, Fathi Yusuf and his sons took funds that were required to be offset against that amount, as he well knows. . . .(Emphasis added.)

What Mohammad Hamed stated, at page 102-103 of his 3/31-4/1, **2014** deposition was:

In.9 Q. (Mr. Hodges) And as I understand it, as of today,
In.10 you -- you are still not aware of the facts and
In.11 circumstances surrounding the \$1.6 million that's referenced
In.12 in Exhibit No. 3, is that right?

In.13 MR. HARTMANN: Object. Asked and answered.
In.14 MR. HODGES: Show him the letter while
In.15 you're --
In.16 THE INTERPRETER: This one?
In.17 MR. HODGES: No, the 1.6.
In.18 THE INTERPRETER: Right.
In.19 MR. HODGES: You want me to ask the question
In.20 again?
In.21 THE INTERPRETER: Please.

* * *

In.3 Q. (Mr. Hodges) Okay. If you would point out the
In.4 1.6 million on Exhibit 3? And the -- the words to the
In.5 left -- left of it, Past confirmed withdrawal?
In.6 **Okay. So, Mr. Hamed, as -- as you're sitting**
In.7 **here today, you are not aware of any of the facts**
In.8 **surrounding the, quote, Past confirmed withdrawals of**
In.9 **\$1.6 million, is that correct?**
In.10 MR. HARTMANN: Object. Asked and answered.
In.11 THE INTERPRETER: Okay.
In.12 **He says no.**
In.13 MR. HODGES: Okay. I guess that's a good
In.14 time to break, then. (Emphasis added.)

This was just one small part of the relationship between the parties that was partially accounted at one time, and thus was incomplete. Mike Yusuf testified that Plaza Extra - East receipts were tallied between the Hameds and the Yusufs, showing that Hameds had taken out approximately \$1.6 million more than the Yusufs prior to the 2001 FBI raid. However, Mike Yusuf also testified that the reconciliation did not include St. Thomas and it did not include all of the Plaza Extra-East receipts. See, 30(b)(6) Deposition of United Corporation through its representative, Mike Yusuf, *Hamed v Yusuf*, SX-12-CV-370, April 3, 2014, pp. 64-68. The \$1.6 million was just one facet of various claims between the Yusufs (not United) and the Hameds at that time. **To get what was "owed" as an effect of ALL ACCOUNTS at that time, one would have to know the similar amounts from the other operations at the same time.**

Thus, Hamed objects to this amount because 1) it is outside of the applicable timeframe for claims and 2) it is clear that a full accounting prior to the FBI raid was not

done, thus making the \$1.6 million one data point in the various claims between the Partners.

Exhibit 3, BDO Tables 15-22:

Tables 15A-17B, 20A, 21A-21B – Hamed objects to Tables 15A-17B, 20A, 21A-21B.

These tables are irrelevant because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 15A-17B, 20A, 21A-21B occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these tables, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Table 18 - Hamed objects to Table 18 as these are attorneys' fees and associated expenses incurred in the joint defense of the criminal case, *United States of America vs. United Corp. et. al.*, in the District Court of the Virgin Islands (St. Thomas Division), Docket No. 1:05-cr-00015. These expenses were not split or attributed to any individual defendant, "rather all defense counsel worked together on behalf of all of the represented

defendants in a joint effort to defend the case," according to the affidavit of Gordon C.

Rhea:

I, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

2. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:

FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed
WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION

4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.
6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.
7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.
8. Under the Joint Defense Agreement;
 - a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.
 - b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.
 - c. Simply because a bill was 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 place.
 - d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to

authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.
e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account.

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf).¹⁵

Further evidence of this is shown in letters Randall Andreozzi, Esq., wrote on behalf of the United Corporation in 2012-2009 to the federal government, requesting Partnership funds be released on United's behalf. An attorney solely representing Waleed Hamed would not be making requests to the federal government in a criminal case on behalf of the United Corporation and its shareholders. Yusuf's argument that Attorney Andreozzi solely represented Waleed Hamed during the time of the joint defense agreement is absurd. See, e.g., HAMD562177-HAMD562179.pdf, HAMD562183-HAMD562185.pdf, HAMD261888-HAMD261892.pdf, HAMD562180-HAMD562182.pdf, HAMD562174-HAMD562176.pdf, HAMD562159-HAMD562166.pdf and HAMD562157-HAMD562158.pdf.

¹⁵ First, Table 18 is incomprehensible. What BDO appears to have done on 18, is target bills from specific attorneys such as Pam Colon or other similar professionals. Thus, in bulk, Colon's bills were excepted. No reference is made to what work she actually did or for whom from any documentation. Beyond the obvious refutation of this by the supplied declaration and the underlying Joint Defense Agreement, Hamed notes that no support is provided in the invoices of such lawyers as to either the work done or for which party it was done.

Thus, the completely unsupported and fanciful "assumption" by BDO as to what work Ms. Colon did, for example, underlines the failure of Table 10A. To put this another way, this is not an accounting, it is a "BDO accepts the completely unsupported statement of Fathi Yusuf, in the total absence of underlying documentation, as to who did what – and we might as well have claimed absolutely ANY amount and simply said 'because Fathi said so'." Again, this is not an attempt to provide an accounting via underlying documents, it is an attempt to make a position look like an accounting by dropping in a bunch of numbers based on what Fathi Yusuf "told" BDO, and then having BDO sign.

Table 19 – Hamed does not contest this table, as it appears that BDO excepted these amounts from the calculations.

Tables 20A-21C – Hamed objects to Tables 20A-21C, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Also, all of the Yusuf deposits and charges to credit cards were not accounted for in the BDO report, making the comparisons between the two families' spending inaccurate.¹⁶ Further, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Finally, Hamed does not agree with Tickmark A on Table 21C: “All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney.” During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not

¹⁶ BDO reported, for example, that Fathi, Maher and Yusuf Yusuf had no spending on credit cards from January 1994 through December 2012 and Nejeh Yusuf only had \$100 in spending during the same time period.

exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Table 22 – Hamed objects to Table 22 for all of the reasons given for Tables 15A-21C, plus the following: The headings on Table 22 make it difficult to determine which items occurred on or after Judge Brady's September 17, 2006 date for permissible claims. For instance, Table 22 shows "Funds Withdrawn through Partnership Checks" to be \$72,400.44 (BDO Tables 15A-B). All of those withdrawals were prior to 2005, thus none of those withdrawals are applicable to the current claims process. Additionally, Table 22 shows "Withdrawals from the Partnership with a Signed Ticket/Receipt" to be \$1,307,622.00. All of those withdrawals were prior to 2002 (BDO Tables 16A-16B), therefore none of those withdrawals are applicable to the current claims process. Finally, Table 22 shows "Payments to Third Parties on behalf of Hamed/Yusuf with Partnership Funds Either with Tickets or Checks" to be \$528,998.81. All of those withdrawals were prior to 2003 (BDO Table 17A-17B), thus none of those withdrawals are applicable to the current claims process.

Exhibit 4, BDO Tables 23-28

Tables 23A-26A, 27A – Hamed objects to Tables 23A-26A, 27A. These tables are irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 23A-26A, 27A occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Tables 26A-27C – Hamed objects to Tables 26A-27C, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Further, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Finally, Hamed does not agree with Tickmark A on Tables 26C and 27C: “All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted

for by Gaffney.” During a portion of 2013, the Hameds were locked out of the Partnership’s financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO’s Exhibit J-2 to Yusuf’s October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Table 28 – Hamed objects to Table 28 for all of the reasons given for Tables 23A-27C.

Exhibit 5, BDO Tables 29-33

Tables 29A-31A, 32A – Hamed objects to Tables 29A-31A, 32A. These tables are irrelevant date because Judge Brady’s July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 29A-31A occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady’s July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for

documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Tables 31B-31C – Hamed does not contest Tables 31B-31C, as it appears that BDO excepted these amounts from the calculations.

Tables 32A-33 – Hamed objects to Tables 32A-33, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Further, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Finally, Hamed does not agree with Tickmark A on Table 32C: “All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney.” During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised

amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Table 34 – Hamed objects to Table 34 for all of the reasons given for Tables 29A-33.

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 9. Please produce all documents relating to your claim that no rent is due from the Partnership to occupying Bay 5 and Bay 8.

Response: Hamed disputes the Partnership owes United rent for Bays 5 and 8 at Plaza Extra-East. He does stipulate to the following: (1) He entered into a settlement agreement with regard to the Partnership's use of any of the premises used during such periods by the East Store. Said agreement references the use of whatever premises were used at the Sion Farm location -- and does not restrict its scope to just Bay 1. See, HAMD591991-HAMD592006.pdf and moreover, (2) Hamed knows that Yusuf is in possession of pages from the United Accounts Receivable (labeled "A/R") ledger during that period showing (i) no rent due for the covered period and, more importantly, (ii) no "balance forward." See e.g., FBIX339272-FBIX339301. Both of these documents are documentary evidence to refute that rent is due from the Partnership to United for Bay 5 in the amount of \$271,875.00 and for Bay 8 in the amount of \$323,515.63 for the period of May 1, 1994 to September 30, 2002 and \$198,593.75 for the period of April 1, 2008 to May 30, 2013.

Subject to the above, please see **Attachment A** for a listing of documents responsive to this request.

1 Any expert "retained or specially employed to provide expert testimony" or "whose duties as the party's employee regularly involve giving expert testimony" must provide a written report. Fed. R. Civ. P. 26(a)(2)(B).

2 Fed. R. Civ. P. 26(a)(2)(B)(ii) (1993).

3 Employees Committed for Justice v. Eastman Kodak Co., 251 F.R.D. 101, 104 (W.D.N.Y. 2008).

4 Schwarz & Schwarz of Virginia, L.L.C. v. Certain Underwriters at Lloyd's London Who Subscribed to Policy Number NC959, 2009 WL 1043929, *6 (W.D. Va. 2009) (citing Elm Grove Coal Co. v. Director, O.W.C.P, 480 F.3d 278, 303 (4th Cir. 2007)).

5 See TV-3 Inc. v. Royal Ins. Co. of America, 193 F.R.D. 490, 491 (S.D. Miss. 2000) (holding "other information" means "all communications between counsel and a retained testifying expert, even if those communications contain the attorneys' mental impressions or trial strategy or is otherwise protected by the work product privilege.").

6 2010 Advisory Committee's Notes to Fed. R. Civ. P. 26.

7 Id.

8 Id.

9 Fed. R. Civ. P. 26(a)(2)(B)(ii) (2010).

10 2010 Advisory Committee's Notes to Fed. R. Civ. P. 26.

11 Id.

RFPD 10. For any dispute Hamed has to debts Yusuf claims are owed by the Partnership in Exhibit 6, please provide any documents or supporting evidence which refutes or contradicts these debts of the Partnership.

Response: Exhibit 6 is Yusuf's amended accounting claims, which were filed on October 30, 2017. For purposes of this request for the production of documents, Hamed is referencing section "III. Outstanding Debts of the Partnership," pages 7-12 only. Each section on those pages is addressed separately, below.

Section A. Miscellaneous Debts

Hamed objects to "Section A. Miscellaneous Debts," page 8. This section asserts that \$167,114.78 must be paid by the Partnership prior to any distribution of assets. Yusuf states that as of August 31, 2017, that amount is now \$69,273.51, according to John Gaffney. It is impossible for Hamed not to object to this section, as Hamed has not received any underlying, supporting documentation to validate the accuracy of the debts.

For Hamed to make a determination regarding this section and identify documents, invoices and cancelled checks for each debt need to be examined by Hamed's accountant.

Section B. Unpaid Rent for Plaza Extra East and Adjacent Bays

1. Bay 1 - Increased Rent Due Net of Rent Paid and #3 "Interest"

The first debt (and interest) listed under Section B has been made moot by Special Master Ross' March 15, 2018 Order regarding rent on Bay 1.

In this instance, Yusuf and Hamed are partners of the Partnership (Wind up Order ¶ 1.24). At the same time, Yusuf is also the principal shareholder of United, the landlord of the Partnership at Bay 1. Acting on behalf of United, Yusuf terminated the Partnership's lease at Bay 1, treated the Partnership as a holdover tenant, and raised the rent from \$58,791.38 to \$200,000.00 and \$250,000.00. While "[a] partner does not violate a duty or obligation under this chapter or under the partnership agreement merely because the partner's conduct furthers the partner's own interest" under Title 26 V.I.C. § 74(e), Yusuf's conduct went beyond furthering his own interest. Here, Yusuf dealt with the Partnership on behalf of a party—namely, United—having an interest adverse to the Partnership, in violation of Title 26 V.I.C. § 74(b)(2). Additionally, Yusuf did not act consistently with the obligation of good faith and fair dealing, in violation of Title 26 V.I.C. § 74(d). Thus, the evidence and facts surrounding Yusuf's action through United—terminating the lease with the Partnership at Bay 1, treating the Partnership as a holdover tenant, and raising United's rent significantly higher than the agreed upon rent—demonstrates a transaction prohibited by law and tainted by a conflict of interest and self-dealing.

Based on the foregoing, the Master will deny United's motion for recovery of additional rent from the Partnership as holdover tenant at Bay 1.

Hamed v. Yusuf, et al.; SX-12-CV-370; SX-14-278; SX-14-287 Order, March 15, 2018, at pp. 6-7 (footnotes omitted).

2. Bays 5 and 8

Hamed disputes the Partnership owes United rent for Bays 5 and 8 at Plaza Extra-East. He does stipulate to the following: (1) He entered into a settlement agreement with regard to the Partnership's use of any of the premises used during such periods by the East Store. Said agreement references the use of whatever premises were used at the Sion Farm location -- and does not restrict its scope to just Bay 1. See, HAMD591991-HAMD592006.pdf and Moreover, (2) Hamed knows that Yusuf is in possession of pages from the United Accounts Receivable (labeled "A/R") ledger during that period showing

(i) no rent due for the covered period and, more importantly, (ii) no "balance forward." See e.g., FBIX339272-FBIX339301. Both of these documents are documentary evidence to refute that rent is due from the Partnership to United for Bay 5 in the amount of \$271,875.00 and for Bay 8 in the amount of \$323,515.63 for the period of May 1, 1994 to September 30, 2002 and \$198,593.75 for the period of April 1, 2008 to May 30, 2013.

3. Interest on Rent Claims

Again, this debt has been made moot by Special Master Ross' March 15, 2018 Order regarding rent on Bay 1. Further, Hamed disputes that interest is owed on rent for Bays 5 and 8, as there is no rent owed by the Partnership, and by extension, no interest is owed either.

Section C. Reimbursement for Gross Receipts Taxes Paid by United

Hamed disputes this debt. The Partners agreed when the Partnership was formed that all gross receipts of United *ascribable to Partnership operation, but not those of unrelated United businesses* were to be paid from the grocery store operations. As this claim relates to United's businesses unrelated to the Plaza Extra Partnership, the Partnership does not owe United \$60,586.96. Further, the time period United is claiming reimbursement for United's gross receipts is 1993-2001. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

Section D. Black Book Balance Owed United

Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated in 1993-1994. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for

debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Further, the documentary evidence Yusuf provided is merely a couple of pages out of a so-called black book. It is impossible to say definitively that the Partnership owes this amount to United, because all of the records of the Partnership are not available from 1993 forward. This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

Section E. Additional Ledger Balances Due to United

Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated in 1994, 1995 and 1998. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Further, the documentary evidence Yusuf provided is merely a couple of pages out of a ledger, the entire ledger was not even produced. It is impossible to say definitively that the Partnership owes this amount to United, because all of the records of the Partnership are not available from 1993 forward. This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22. Finally, this claim is outside of the time period Judge Brady set for

bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

Section F. Water Revenue Re Plaza Extra-East

Hamed disputes this debt. Yusuf contends that from April 1, 2004, all revenue from the sale of water that was collected by Plaza Extra-East was to be paid to United. The water sales actually did not belong to United, but to the Partnership.

A little background is in order. When the Partnership purchased the one-acre property at Plaza Extra-East, it also built, with Partnership funds, a 400,000 to 450,000 gallon cistern on the property. Additionally, one or two water wells also were used to fill the cistern. This was during the 1990s. At that time, there was a water shortage on island, WAPA had difficulty consistently providing water and, other than WAPA, there really weren't other companies selling water. The Partnership filled this gap by selling water, starting approximately in 1994. Yusuf is correct that during 1994-2004, the proceeds from the sale of the water went to charity (half to Mr. Yusuf's choice of charity and the other half to Mr. Hamed's choice of charity) and to pay the expenses of the water generation and delivery. At its peak, in the 1990s, 10 or more trucks a day, each with a capacity of about 30,000 gallons, delivered water to St. Croix residents.

After April 1, 2004, the funds generated from the enterprise went to the Partnership, rather than to charity. The sale of water dropped off quite dramatically for the Partnership in the 2000s. Competitors, such as Marcos and others, entered the market. To get a sense of the scope, in the 2000s, the Partnership was sending out one or two trucks a day to deliver water, rather than the previous 10 or more trucks.

Eventually, Yusuf Yusuf was in charge of monitoring the water sales. For a time, water sales were recorded on hand written receipts, but there weren't any controls to

ensure that the vendors did not take more water than they were billed. Wally Hamed then recommended, and Yusuf Yusuf implemented, a key being programmed into the register at the service desk to record the sales of water.

Hamed objects to this blatant claim by Yusuf & United for a number of reasons. First, neither United nor Yusuf has provided any document memorializing this so-called agreement between the Partnership and United because one does not exist. Next, Yusuf picks two years of sales, 1997 and 1998, and extrapolates those two years of sales into an average of \$5,291.66 per month and applies that monthly figure to every month from April 1, 2004 through February 28, 2015. As is explained by the chronology, water sales dropped off dramatically in the 2000s, so of course Yusuf picks two years of sales during the most profitable years. Third, Yusuf does not provide *any* documentation to support the sales for 1997 and 1998, nor does he provide *any* documentation to support water sales from April 1, 2004 through February 28, 2015, even though both paper copy receipts and information from the register could be generated to show actual sales. Fourth, and perhaps most galling, United doesn't have any right to the water, as it is Partnership water, so this really isn't money United is entitled. Finally, this leads to Hamed's belief that this is another example of what Special Master Ross described as "a transaction prohibited by law and tainted by a conflict of interest and self-dealing," when discussing the inflated rents United tried to collect on Bay 1. Yusuf is not fulfilling his fiduciary duty to the Partnership and instead is trying to loot the Partnership for his corporation, United.

Section G. Unreimbursed Transfers to Plaza Extra from United's Tenant Account

Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated 1996. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Further, the documentary evidence Yusuf provided

merely are journal entries from United's tenant account. It is impossible to say definitively that the Partnership owes this amount to United, because all of the records of the Partnership are not available from 1993 forward. This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

Subject to the above, please see **Attachment A** for a listing of documents responsive to this request.

RFPD 11. As to the accounts listed in Exhibit 7 which was Exhibit K to Yusuf's Claims, please produce copies of any and all statements for the period from September 17, 2006 to date.

Response: Object. This request is objected to as being beyond the scope of the current accounting process, as it involves foreign properties. Subject to that objection, Hamed states the following:

Arab Bank, Account No. 9020-415410-700 (JOD) – This was Mohammad Hamed's bank account.

Arab Bank, Account No. 9020-415410-500 (JOD) – This was Mohammad Hamed's bank account.

Arab Bank, Account No. 9020-415410-510 (USD) – This was Mohammad Hamed's bank account.

Arab Bank, Account No. 9020-415410-570 (ILS) – This was Mohammad Hamed's bank account.

Arab Bank, Nablus Branch, Account No. 9020-415410-710 (USD) – This was Mohammad Hamed's bank account.

Cairo Aman Bank, Account No. 001 0001629 012123 833 (JOD) – This was Mohammad Hamed's bank account.

Cairo Aman Bank, Account No. 001 0001629 03 2123 833 (USD) – This was Mohammad Hamed's bank account.

Cairo Aman Bank, Account No. 02501171878 00 (USD) – This account is in Wally Hamed's name. However, this account was used in the money laundering scheme for the Plaza Extra stores that was the subject of the 2001 FBI raid and on the stores and the subsequent criminal case and conviction of United Corporation. Wally Hamed does not have these account statements, as Fathi Yusuf had them sent to himself at the Plaza Extra-Tutu store. Fathi Yusuf is in the best position to provide any statements for the period from September 17, 2006 to date.

Banque Francaise Commerciale, Account No. 40-60-63878-90 – This account is in Wally Hamed's name. However, this account was used in the money laundering scheme for the Plaza Extra stores that was the subject of the 2001 FBI raid and on the stores and the subsequent criminal case. Wally Hamed does not have these account statements, as Fathi Yusuf had them sent to his relative, Isam Yousuf, on Sint-Maarten. There is a document that was gathered by the FBI, indicating that this account was closed sometime in 2002. See, HAMD204104-HAMD204104.

Banque Francaise Commerciale, Account No. 40-60-63878-91 – This account is in Wally Hamed's name. However, this account was used in the money laundering scheme for the Plaza Extra stores that was the subject of the 2001 FBI raid and on the stores and

the subsequent criminal case. Wally Hamed does not have these account statements, as Fathi Yusuf had them sent to his relative, Isam Yousuf, on Sint-Maarten. Fathi Yusuf is in the best position to provide any statements for the period from September 17, 2006 to date.

Subject to the above, please see **Attachment A** for a listing of documents responsive to this request.

RFPD 12. Produce all documents identified in your responses to the Requests to Produce contemporaneously served on you.

Response: Object. Incomprehensible.

RFPD 13. Produce all documents relating to Hamed Claim No. 2.

Response: Claim H-2 has been fully briefed and will be determined based on those briefs, thus, no discovery remains. However, Hamed's knowledge, positions and evidence have been fully set forth in the Motion (12/20/2017) and Reply (1/17/2017) as well as in the Amended Complaint (10/19/2012) and the Proposed Findings submitted in the PI motion process (2/27/2013). See also, Hamed's response to Yusuf's RFPD 13. Subject to that:

This litigation began in 2012 when Fathi and Mike Yusuf unilaterally took \$2,784,706.25 from a partnership account and transferred it to an account to which the Hameds did not have access. This was the main issue in Hamed's 2012 complaint -- and the central issue during the early portion of this case. Because Yusuf was claiming that Hamed had no interest in the Plaza Extra Stores, unilaterally withdrawing \$2.7 million from the partnership account and trying to have the police remove the Hameds from the stores, Judge Brady granted a full evidentiary TRO hearing which stretched to two days -- January 25th and 31st, 2013.

Three months later, the Court ruled for Hamed on the matter. (See the Court's *critical* Memorandum of April 25, 2013. *Hamed v. Yusuf*, 58 V.I. 117, 2013 WL 1846506 (V.I. Super. April 25, 2013)). The Court stated at paragraphs 35 and 36:

On the first hearing day, Mahar Yusuf, President of United. Corporation testified under oath that he used the \$2,784,706.25 withdrawn from the Plaza Extra operating account to buy three properties on St. Croix in the name of United. On the second hearing day, Mahar Yusuf, contradicted his prior testimony and admitted that those withdrawn funds had actually been used to invest in businesses not owned by United. . . . (Emphasis added.)

Id. at *10. And, further, at footnote 9, at *19:

With regard to the August 2012 diversion of more than \$2.7 million by Mahar Yusuf, president of United, to accounts inaccessible to Plaintiff, a real concern exists that continuing diversions will not be traceable as the Plaza Extra store have had no system of internal controls in existence and, to date accounting for the businesses is not completed beyond June 2012....

There is no way that Yusuf can now alter the Court's decision on this matter -- having since conceded that there was a Yusuf/Hamed partnership that owned the Plaza Extra Stores, and Judge Brady having entered summary judgment. Simply put, Yusuf tried to steal the Plaza Extra Stores, claim that Hamed was just an illiterate employee, give him a small "annuity" rather than his 50%, and throw the Hameds out -- and he began all of this by baldly stealing the \$2.7 million.

However, Yusuf (as the Liquidating Partner) has delayed having this declared a valid claim by repeatedly saying he too has claims that must be heard as well. That may be the case, and he may or may not prove those other claims, but as there is no doubt that the Yusufs took the money and (as Judge Brady's memorandum makes clear) that \$2.7 million plus interest is a valid claim and must be returned to the Partnership.

The original amount of the claim was \$2,784,706.25. Additionally, Hamed seeks \$1,305,988 in statutory interest at 9% from August 15, 2012, the date of the Plaza Extra check written to the United Corporation (unilateral Partnership withdrawal).

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 14. Produce all documents relating to Hamed Claim No. 13.

Response: H-13 relates to Hamed's payment of taxes during criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) where the Partnership did not pay for Waleed ("Wally") and Waheed's ("Willie") 2002-2012 taxes, but the Partnership did pay for Yusuf and his children's 2002-2012 taxes. Hamed has stated his positions in his motion on this claim. In addition, the following chronology supports Hamed's contention:

On May 24, 2013, the Virgin Islands Bureau of Internal Revenue ("VIBIR") sent a letter to Fathi Yusuf's personal attorney, Nizar DeWood, stating that "United and Related entities" owed the government \$6,586,132.00 in taxes for 2002-2012. On June 14, 2013, Maggie Doherty, US Marshal's Service, authorized the release of \$6,586,132.00 from the Partnership Banco Popular Securities account for tax payments to VIBIR (during the course of the criminal case involving United, Fathi, Maher and Yusuf Yusuf and Waleed and Waheed Hamed, the US Marshal's Service had to authorize any release of funds in excess of a certain amount from the Partnership's banking and investment accounts). The VIBIR was paid and the Hameds thought that this amount covered their parents' taxes.

On June 20, 2013, Maggie Doherty, US Marshal's Service, authorized the release of \$315,747.00 from the Partnership Banco Popular Securities account for the estimated income tax liabilities for both Waleed and Waheed Hamed (the tax liability for both men subsequently was revised to \$129,546.00 for Wally and \$3,582.00 for Willie). As was the requirement following Judge Brady's preliminary injunction order on April 25, 2013, one Hamed and one Yusuf had to sign a check jointly from the Partnership accounts before

any amount could be distributed. Fathi Yusuf refused to sign the check written to pay Wally and Willie's taxes for 2002-2012.

On June 29, 2012 [*sic*], Fathi Yusuf's personal attorney, Joseph DiRuzzo, claimed in a letter to Tamika M. Archer, Esq., VI Office of the Attorney General, Tamarah Parson-Small, Esq., VIBIR, and Lori Hendrickson, Esq., DOJ, that the \$6.5 million tax payment agreed to during a mediation on the subject was not to cover Mohammad Hamed or his sons:

This is a material breach of the agreement that was reached in the mediation conducted before Judge Barnard. The Parties to the mediation explicitly agreed that the \$6.5M tendered was to satisfy only the Yusuf family members' tax liabilities for the years 2002 - 2010 and not for any tax liability of Mohammad Hamed (and by extension any of the Hamed family members). We made clear that this term was non-negotiable. Everyone present agreed that Mohammed Hamed was not to be covered and under no circumstances would any portion of the \$6.5M be credited/transferred to the tax account or to satisfy any tax liability of another taxpayer (and in particular Mohammad Hamed or his family members).

See HAMD594355-HAMD594356.pdf at p. HAMD594356. Attorney DiRuzzo then threatened to recoup the \$6.5 million payment from the government unless the VIRIB confirmed that the payment applied only to Yusuf and his children's taxes:

In order to cure the breach we demand (i) that the VIBIR retract the June 20th letters issued to Mohammad Hamed (and confirm in writing its withdrawal to us) and (ii) that the VIBIR issue us a letter confirming that the \$6.5M paid was used to satisfy only the tax liabilities of the Yusuf family members (as shareholders of United Corporation, as an Subchapter S-Corp under the Internal Revenue Code) and not to satisfy any tax liability of Mohammad Hamed or any other taxpayer (including but not limited to other Hamed family members).

If the VIBIR does not cure this breach immediately we will seek to recoup the \$6.5M that was tendered as it was obtained either (i) by mutual mistake, (ii) in bad faith, or (iii) by fraud. *Id.*

On July 1, 2013, concerned that the VIBIR would lose the \$6.5 million tax payment, Claudette Watson-Anderson, CPA, VIBIR, sent a letter to Attorney DiRuzzo stating,

In response to your letter dated June 29, 2013, the Bureau hereby acknowledges that full payment of tax owed, in the amount of \$6,586,132, has been applied to the returns filed for the following taxpayers only:

Fathi & Fawzia Yusuf

Yusuf & Ala Yusuf

Zeyad Yusuf

Maher & Najat Yusuf

Nejah Yusuf

Zayed Yusuf

See HAMD594305-HAMD594305.pdf.

Also, on July 1, 2013, Lori Hendrickson, U.S. Department of Justice, confirmed that the \$6.5 million tax payment was not applicable to the Hamed family.

I am in receipt of your letter dated June 29, 2013 and the declaration of Waleed Hamed dated June 27, 2013. The statements from the declaration you quoted in your letter are not based on any representations or promises made by representatives of the Virgin Islands Bureau of Internal Revenue (VIBIR) or the United States. As we all agreed, the \$6,586,132 was applied only to members of the Yusuf family for taxes owed for 2002 through 2010. This is confirmed, as you requested, in the attached letter dated July 1, 2013 signed by the Director of the VIBIR. No one from the named family received any credit or benefit from that payment.

See, HAMD594304-HAMD594304.pdf.

On July 16, 2013, Lori Hendrickson, DOJ, confirmed to the court in the criminal tax case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) that all members of the Yusuf family who were United shareholders (including those children who did not work in the Plaza Extra stores), had their taxes paid by the Partnership, and further, if those shareholders owed for other income unrelated to Plaza Extra, such as income from investments, then the Partnership paid those taxes too.

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20

21

MS. HENDRICKSON: Yes, to clarify. I agree with Mr. Andreozzi that during those

22 years [of the criminal case] the payments were made, based on copies
23 of the requests for payment government sought
24 and approved, and let the money be released,
25 that **it was money to pay the tax obligations of**

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1 **the Yusuf family members who were listed as**
2 **shareholders in the record of the VIBIR. And**
3 **there was other income on some of their**
4 **returns. So, if they had other investments and**
5 **things like that.** So I think that is a fair
6 representation to say United paid for other
7 taxes that the individual shareholders owed on
8 top of the flow through based on United's
9 operations.

* * *

23 So to the extent there was additional money
24 paid, and I reviewed the tax returns, I agree
25 with Mr. Andreozzi's point, but I think it has

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1 no impact on the plea agreement itself, since
2 the government's purpose was to get all the
3 income reported and the taxes paid for the
4 income of Plaza Extra. And with the payment of
5 \$6.5 million, that has occurred.

6 THE COURT: If that included other than
7 the flow through, so be it?

8 MS. HENDRICKSON: Yes.

* * *

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17 The fact that the United won't pay for the
18 Hameds, that is a separate issue. In February
19 of 2011, yes, they paid for everyone's. Now,
20 in June, July of 2013, United does not agree to
21 pay, but the Hameds, as taxpayers, are legally
22 obligated to report income and pay taxes
23 whether or not they're part of a criminal case. (Emphasis added.)
24

On December 9, 2013, Willie Hamed wrote a check for \$3,582.00 out of his personal Banco Popular account to the VIRIB for his 2002-2012 taxes. See, JVZ-000868-JVZ-001730.pdf at p. JVZ-001174.

On March 30, 2014, Wally Hamed wrote a check for \$129,546.00 out of his personal Banco Popular account to the VIRIB for his 2002-2012. See, JVZ-000868-JVZ-001730.pdf at p. JVZ-001172.

On September 28, 2016, Hamed's CPA reviewed the general ledgers from 2012 to present provided by John Gaffney for any reimbursements to Waleed and Waheed for these tax payments or payments of the taxes made by the Partnership directly to VIBIR for the same period. None were found. See, JVZ-000001-JVZ-000867.pdf at p. JVZ-000039.

Thus, Fathi Yusuf authorized the Partnership to pay the 2002-2012 taxes for himself, his wife, his three children who worked in the Plaza Extra stores and his two children who were shareholders of the United Corporation, but did *not* work for Plaza Extra. Further, Fathi Yusuf blocked the Partnership's payment of Wally and Willie Hamed's 2002-2012 taxes. Clearly, this is another instance of, as Judge Ross opined in an earlier opinion about Fathi Yusuf's actions, "a transaction prohibited by law and tainted by a conflict of interest and self-dealing."

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 15. Produce all documents relating to Hamed Claim No. 17.

Response: H-17 relates to Hamed's payment of attorneys' fees and expenses during the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15). For a period of time, all of the defense attorneys worked together under a Joint Defense Agreement to represent the following: United Corporation, Fathi, Maher ("Mike"), and Nejeh Yusuf and Waleed ("Wally") and Waheed ("Willie") Hamed.

One feature of the Joint Defense Agreement concerned the payment of fees. A retainer (funded by Partnership bank accounts) for attorneys' fees and expenses for all of the defendants was established at the law firm of Andreozzi, Bluestein LLP and Richardson Patrick Westbrook & Brickman, LLC, as the attorneys worked together for all of the defendants to defend the case. Replenishment and draws from the retainer were required approval of the Court. See, e.g., HAMD202558-HAMD202562.pdf,

HAMD202587-HAMD202587.pdf, HAMD202691-HAMD202694.pdf, HAMD248051-HAMD248053.pdf and HAMD202721-HAMD202721.pdf.

The Joint Defense Agreement expired on September 19, 2012 when Attorney Joseph DiRuzzo was retained to represent Fathi Yusuf. Fathi Yusuf is now refusing to allow the Partnership to pay attorneys' fees and expenses for attorneys' fees that were incurred prior to September 19, 2012, which is the subject of H-17. The following chronology supports Hamed's contention:

As noted, under the Joint Defense Agreement in the criminal case, *United States v Yusuf*, attorneys' fees and expenses were not split or attributed to any individual defendant, "rather all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case," according to the March 2, 2017 declaration of Gordon C. Rhea, one of the attorneys party to the Joint Defense Agreement:

I, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

3. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:
FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed
WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION
4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.
6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.

7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.

8. Under the Joint Defense Agreement;

a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.

b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.

c. Simply because a bill was 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 place.

d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.

e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account.

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf)

On September 19, 2012, Attorney Gordon Rhea sent an email to all of the attorneys party to the Joint Defense Agreement and Attorney Joesph DiRuzzo, stating:

It is with sadness that I must announce the termination of the joint defense team that we assembled in the early stages of the Federal criminal case against United Corporation, the Yusufs, and the Hameds. Working in harmony toward a common purpose, we brought a difficult case to a remarkably successful conclusion, resulting in the dismissal of all charges against all individuals. The joint defense agreement was formed to advance the common interests of all defendants in the criminal matter; sadly, it no longer appears capable of discharging that function.

Recent events have eroded the once-harmonious relationship among our clients, who are now divided into camps that are at serious odds with one another. The Hamed and Yusuf families are engaged in a bitter civil dispute, each has retained attorneys to pursue their civil disagreements, and civil litigation is in train. United Corporation has directed attorneys Alkon and Cole, who skillfully represented that entity during the active phase of the criminal case, to withdraw, and has replaced them with an attorney who

represents the Yusuf family interests and who has acted unilaterally by making overtures to the Federal prosecutor without consulting the defense team. In addition, **the Yusufs have directed United not to pay the fees of various defense team members who represent Hameds, contrary to the protocol followed in the past.**

See, HAMD201592-HAMD201593.pdf at p. HAMD201592 (Emphasis added).

On April 17, 2004, Judge Barnard, Magistrate, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, held that the attorneys' fees and expenses reimbursement by Hamed was covered under the Joint Defense Agreement and should be paid by Partnership funds:

At the mediation counsel advised that they had represented the defendant, as well as dismissed defendants, pursuant to a joint defense agreement which had been negotiated early in the litigation.

Because of a substitution of counsel and divergence in trial strategy the Joint Defense Agreement was concluded on September 19, 2012. At the close of the mediation the attorneys' billing statements were requested for in camera review. After a thorough review of the invoices presented by counsel and the retained accounting experts, the mediator concluded that because of the termination of the Joint Defense Agreement the invoices should be resubmitted in camera for consideration of work performed prior to September 19, 2012.

Invoices were received from the Law Offices of Pamela Lynn Colon, LLC., Gordon C. Rhea, P.C., Andreozzi, Bluestein, Fickess, Muhlbauner Weber, Brown LLP, and Freed Maxick, CPA PC. Invoices were not received from Feurst, Ittleman, David, and Joseph, P.L. nor from Nizar Dewood, Esq. The subject invoices were reviewed in camera and the work performed by counsel and the accountants was in furtherance of the object of the Joint Defense Agreement. The invoices submitted are approved as follows:

Pamela Lynn Colon, LLC \$46,393.95
Gordon C. Rhea, PC. 16,737.90
Andreozzi, Bluestein LLP 118,418.57
Freed Maxick CPA, PC 151,350.00

Accordingly, the sum of \$332,900.42 is directed to be released for the restrained assets of the defendant to the Escrow Account of Andreozzi, Bluestein, in accordance with prior protocol established by Judge Raymond Finch, for distribution to counsel and experts in the sums approved pursuant to the Joint Defense Agreement.

See, HAMD599941-HAMD599944.pdf at pp. HAMD599941-HAMD599942.

On August 17, 2014, Mohammad Hamed paid the following out of his personal Banco Popular checking account: Pamela L. Colon, Esq., \$46,393.95, Gordon C. Rhea, Esq., \$16,737.90, Andreozzi, Bluestein LLP, \$118,418.57 and Freed Maxicx, CPA, PL, \$151,350.00. These fees were incurred for work completed prior to the expiration of the Joint Defense Agreement on September 19, 2012. See, JVZ-000868-JVZ-001730.pdf at p. JVZ-001211-JVZ001214.

Yusuf now is trying to contend that this was not the case and each defendant was required to pay his own individual attorney during the course of the Joint Defense Agreement. This is an absurd contention on Yusuf's part. Carried to its extreme, it would mean that the Yusuf defendants and the United Corporation would only pay \$237,691.00 or 5% of the total cost of attorneys' fees and expenses, while Hamed would pay a whopping \$4,121,561.00 or 95% of the total. See, HAMD641485-HAMD642240.pdf, p. HAMD642214. Hamed disputes this contention and provides the March 2, 2017 declaration of Attorney Gordon Rhea and Judge Barnard's April 17, 2014 Order as support.

Hamed's CPA also provided John Gaffney a query dated February 15, 2016 asking whether these fees were reimbursed. Hamed's CPA reviewed the general ledgers from 2012 to present provided by John Gaffney for any reimbursements to Waleed for these payments or payments made by the Partnership directly to Waleed Hamed for the same period. None were found. See, JVZ-000001-JVZ-000867.pdf at p. JVZ-000044-45.

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 16. Produce all documents relating to Hamed Claim No. 129.

Response: Partnership funds were withdrawn by Fathi Yusuf. From those funds, he and his wife Fawzia gave Shawn Hamed \$1.5 million and Mafi Hamed \$1.5 million. Their affidavits clearly state that the amounts were **gifts** to Mafi and Shawn Hamed. Nothing

in the affidavits suggest that the gifts are recoverable as "loans," came from the Partnership rather than Yusuf, or were "distributions" as to both families. Further, there are no other writings documenting that this was an equal distribution between Hamed and Yusuf. This was solely a Yusuf withdrawal. Moreover, in the Hoda Hamed divorce proceedings she describes these as her father's or her property for these same reasons. Because of the divorce claim that was made in 2016, Hamed is making a claim here to return the unequal withdrawal.

Additionally, Fathi Yusuf withdrew an additional \$1 million for himself at the same time the \$3 million in gifts was drawn. Mr. Yusuf kept that money for his own purposes and there was no corresponding \$1 million withdrawal for Hamed. See, HAMD248055-HAMD248057.pdf, HAMD200057-HAMD200057.pdf.

Documents relating to this claim include:

- July 1, 2011 letters from Fathi and Fawzia Yusuf gifting Mufeed and Shawn Hamed \$1.5 million each.
- Checks and bank statements regarding the July 1, 2011 gift from Fathi and Fawzi Yusuf to Mufeed and Shawn Hamed.
- August 12, 2011 pleading, Defendants' Motion for Release of Funds from United Corporation to the Shareholders of United Corporation, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15.

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 17. Produce all documents relating to Hamed Claim No. 145.

Response: H-145 relates to the way the Virgin Islands Water and Power Authority ("WAPA") deposits paid by the Partnership in 1993, 1994, 1999 and 2000 were distributed after the Partnership was dissolved. Hamed contends that the deposits should have been

split 50/50 and returned to each Partner. This did not happen and an unequal amount, favorable to Fathi Yusuf and United the Corporation, was distributed.

The WAPA deposit and interest for Plaza Extra-East totaled \$110,842.00, Plaza Extra-West totaled \$127,037.03 and Plaza Extra-Tutu totaled \$34,693.06, for a grand total of \$272,572.09 or \$136,286.05 per partner. See, YUSF238279-YUSF238287.pdf.

According to John Gaffney's May 17, 2016 explanation, the deposits were divided as follows:

The disposition of deposits in each location was as follows:

1. Plaza East - since there was no refund or other event and since the deposits are in favor of United Corporation without change, the balance was treated as a capital distribution.
2. Plaza West - since the deposits are in the name of Plessen Enterprises, inc. which is owned 50/50 consistent with Plaza ownership, these deposits were distributed to the partners consistent with the elimination of inter-company debt on 12/31/14. This adjustment was made after recognizing the accrued interest in the partnership.
3. Plaza STT - the deposits and accrued interest were offset against the final WAPA invoice.

I am unable to locate a copy of the final WAOA [*sic*] invoice in STT.

See, YUSF238182-YUSF238184.pdf at p. YUSF238279.

John Gaffney further stated that the \$34,693.06 deposit for Plaza Extra-Tutu was credited against the last bill. Unfortunately, it is unclear how much of the last bill should be attributed to the Partnership and how much should be attributed to Hamed, who purchased the store on May 1, 2015. Because John Gaffney cannot locate the final WAPA bill, the proceeds from the deposit should be split equally between the partners.

Also, it is unclear what the "inter-company" debt on 12/31/14 being eliminated was and whether it was appropriate. Absent more information on exactly what this debt was, Hamed does not agree that the inter-company debt that was eliminated was appropriate.

Hamed's CPAs also took issue with this division:

Opinion as to the Issue Identified:

We noted adjustments had been made on East & West to deposit amounts recorded in the accounting records to reflect balances at 12/31/14. The adjustment made to STT accounting records did not agree with the statements provided by WAPA.

We disagree, however, that the treatment of the deposits was accurate. All deposits were made with Partnership funds and the subsequent interest payments are also considered Partnership funds. Because the deposits and interest payments are Partnership funds, there is no justification for returning Plaza Extra East's deposit and interest to the United Corporation. Similarly, there is no justification for attributing Plaza Extra West's deposit and interest to the "elimination of inter-company debt on 12/31/14" for Plessen Enterprises, Inc. - an unexplained phrase that has no justification or documentation to support it. The St. Thomas store's treatment of the deposit and interest is also faulty. The amount should have been returned to the Partnership and not applied to the St. Thomas WAPA bill. As John Gaffney cannot find a copy of the WAPA invoice that the deposit and interest were allegedly applied against, this treatment in the general ledger cannot be substantiated. Further, there is no evidence of payment, receipt or refund of WAPA deposits. . . . See, JVZ-000001-JVZ-000867.pdf at p. JVZ-000030.

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 18. Produce all documents relating to Hamed Claim No. 154.

Response: H-154 relates to Hamed's payment of attorneys' fees and expenses during the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) from January 1, 2012 to April 16, 2015.

The defendants have repeatedly asserted that Fathi Yusuf was in charge of everything. This also extends to the extensive money laundering scheme that Mr. Yusuf created and directed. Instead of protecting the Partnership, Mr. Yusuf instructed his son "Maher" Mike Yusuf and Negeh Yusuf, as well as Waleed "Wally" and Waheed "Willie" Yusuf to engage in an enterprise taking Partnership funds off island and depositing those funds in various foreign bank accounts. Mike Yusuf, in turn, instructed his sister Hoda to take the Partnership cash he had given her and purchase cashier's checks. Fathi Yusuf also enlisted his relatives in Jordan (his brother and niece) and St. Maarten (his nephew and niece) to launder money for him.

An FBI Interview demonstrates that Fathi Yusuf hid the actual amount of money generated at the Plaza Extra stores by instructing United's comptroller, John Irvin, to base sales on the stores' deposits, not on its actual sales:

IRVIN was told by FATHI YUSUF that store sales would be based on deposits. IRVIN said that normal accounting procedures allow accountants to conduct internal audits. IRVIN advised that YUSUF told him that internal audits were being handled and to simply continue to use deposits to calculate sales. IRVIN said that YUSUF told him this early on and that YUSUF was very emphatic. IRVIN never revisited the subject of sales with YUSUF and continued to base sales on daily deposits. (See, HAMD639822-HAMD639830.pdf at p. HAMD639823).

Fathi Yusuf also artificially manufactured the year-end inventory for each store at \$3 million:

IRVIN was shown copies of February and March of 1999 gross receipts sales tax figures. IRVIN stated that he had a discussion with FATHI YUSUF concerning cost of goods sold. YUSUF told IRVIN that it was not possible to determine actual numbers for cost of goods sold. Per YUSUF'S instructions, IRVIN was told to determine cost of goods sold in whatever manner would reflect approximately \$3 million in year ending inventory for each store. IRVIN also had conversations with WILLIE HAMED concerning cost of goods sold and what the average markup on merchandise was.

IRVIN said that HAMED was not specific but understood that YUSUF wanted ending inventory to be around \$3 million. IRVIN advised that to determine cost of goods sold he would use a formula reflecting a 42% markup, or more often than not, simply plug in numbers so the \$3 million number would be met. IRVIN stated that the reason YUSUF wanted the number for inventory to be around \$3 million for each store was to show a lower net income. If taxable income was too high, YUSUF would tell IRVIN to adjust cost of goods sold to show a decrease in the companies profit. IRVIN stated YUSUF normally had him adjust the numbers presented to him which reflected cost of goods sold. (See, HAMD639822-HAMD639830.pdf at p. HAMD639823)

Additionally, Fathi Yusuf artificially lowered the amount of sales at Plaza Extra Tutu.

IRVIN advised that the rent paid to TUTU PARK MALL was based partly on sales. When the rent was due, YUSUF would go into his office and return to give IRVIN the numbers to be used to pay the portion of the rent that was based on sales. (See, HAMD639822-HAMD639830.pdf at p. HAMD639828)

Irwin's account and Fathi Yusuf's own multiple filings here demonstrate that he, personally, ran the operation and directed the individuals. These activities led the federal government to indict the United Corporation, Fathi, Mike and Nejeih Yusuf and Wally and Willie Hamed for money laundering. Fathi Yusuf was in charge. The losses include attorneys' fees and expenses paid in defense of the money laundering charges.

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 19. Produce all documents relating to Hamed Claim No. 162.

Response: H-162 relates to claims based on monitoring reports prepared by contractors for the federal government between 2006-2012. Hamed is looking for instances when Yusuf expended Partnership funds for non-Partnership expenses. Hamed has discovery requests to obtain these monitoring reports, but no additional reports were supplied. A motion to compel is necessary. Once the monitoring reports have been obtained, this request for production of documents will be updated.

RFPD 20. Produce all documents relating to Hamed Claim No. 163.

Response: H-163 relates to the loss of assets due to wrongful dissolution, including the attorneys' fees Hamed has had to expend to ensure that Hamed's status as a partner was secure. As stated regarding the \$2.7 million, Yusuf, stole funds, made claims, attempted to get the Hameds thrown out by the police, obtained criminal prosecution by lying to the police, and otherwise caused the wrongful dissolution of the partnership.

The central fact of a partnership is that it is an agreement between two or more persons "to carry on as co-owners a business for profit formed under section 22 of this chapter, predecessor law, or comparable law of another jurisdiction." 26 V.I.C. § 2. On November 7, 2014, this Court declared that a partnership has existed between Hamed and Yusuf since 1986.

It is undisputed and a matter of record that in 2012, Yusuf declared in pleadings before this Court that no partnership existed and thereby attempted to take *the ongoing businesses for himself*. His attempt to take all of the Partnership's assets has created numerous costs and losses, as described below.

As the best example of this, Yusuf's counsel stated to the V.I. Supreme Court that no such partnership existed and that all Hamed was entitled to was some sort of "annuity" to be determined by Yusuf. See Transcript of Oral Argument, *Yusuf v. Hamed*, S.Ct. Civ No. 2013-CV-0040 (July 9, 2013) at 7-9.

JUSTICE HODGE: -- and now its an annuity?

MR. DIRUZZO: Well, that's -- that's my best way to -- to describe or couch, which is why we characterize it as an almost uncharacteristic or uncharacterizable agreement. It almost defies your typical definitions because it is so out of the ordinary. . . .

Thus, Yusuf denied the partnership and attempted to take and run its three businesses.

A. Costs to Stop Taking of All Partnership Assets Generally

As a result, Plaintiff Hamed has had to undertake the costs of this legal action to establish the existence of the partnership. *Section 602 of the Revised Uniform Partnership Act*, enacted in the USVI at V.I. 26 § 122 (Partner's power to dissociate; wrongful dissociation) provides:

SECTION 602. PARTNER'S POWER TO DISSOCIATE; WRONGFUL DISSOCIATION.

- (a) A partner has the power to dissociate at any time, rightfully or wrongfully, by express will pursuant to Section 601(1).
- (b) **A partner's dissociation is wrongful** only if:
 - (1) **it is in breach of an express provision of the partnership agreement;** or
 - (2) in the case of a partnership for a definite term or particular undertaking, before the expiration of the term or the completion of the undertaking:
 - (i) the partner withdraws by express will, unless the withdrawal follows within 90 days after another partner's

dissociation by death or otherwise under Section 601(6) through (10) or wrongful dissociation under this subsection;
(ii) the partner is expelled by judicial determination under Section 601(5);
(iii) the partner is dissociated by becoming a debtor in bankruptcy; or
(iv) in the case of a partner who is not an individual, trust other than a business trust, or estate, the partner is expelled or otherwise dissociated because it willfully dissolved or terminated.

(c) A partner who wrongfully dissociates is liable to the partnership and to the other partners for damages caused by the dissociation. The liability is in addition to any other obligation of the partner to the partnership or to the other partners.

The *Official Comments* to 602(c) state:

Comment

3. Subsection (c) provides that a wrongfully dissociating partner is liable to the partnership and to the other partners for any damages caused by the wrongful nature of the dissociation. **That liability is in addition to any other obligation of the partner to the partnership or to the other partners.** For example, the partner would be liable for any damage caused by breach of the partnership agreement or other misconduct. The partnership might also incur substantial expenses resulting from a partner's premature withdrawal from a term partnership, such as replacing the partner's expertise or obtaining new financing. The wrongfully dissociating partner would be liable to the partnership for those and all other expenses and damages that are causally related to the wrongful dissociation.

The most basic provision of the partnership is that Yusuf and Hamed were partners, and thus were 50% owners of all assets. Yusuf violated that and tried to take everything. (Or at least he tried to take everything minus some "annuity" he calculated was owing.)

There are no fact issues remaining about the existence of the partnership. There are no fact issues remaining as to Yusuf's absolute denial of that partnership for the year and a half it took to wring that admission out of him. There is no dispute of fact that **but for** Yusuf's wrongful actions, Hamed would not have incurred the costs and losses necessary to (1) recover his 50% of the assets, (2) provide access to accounts and (3) obtain a declaration. As a matter of law, there being no further issues of fact, Yusuf "is

liable to the partnership and to the other partners for **damages caused by the dissociation**. The liability is in addition to any other obligation of the partner to the partnership or to the other partners."

B. Recovery of Fees as One Element of Damages

Beyond the fact that a successful USVI Plaintiff can recover attorney fees,¹⁷ fees for RUPS litigation occasioned by the breach of the partnership agreement and for wrongful dissolution are recoverable. See, e.g., *Meyer v. Christie*, No. 07-2230-CM, 2009 WL 3294001, at *1 (D. Kan. Oct. 13, 2009); same on appeal *Meyer v. Christie*, 634 F.3d 1152, 1160–61, 2011 WL 873437 (10th Cir. 2011); *State Farm Fire & Cas. Co. v. Christie*, No. 10-CV-2699, 2015 WL 751808, at *3 (D. Kan. Feb. 23, 2015); *Cratte v. Estabrook*, No. 1 CA-CV 09-0239, 2010 WL 2773372, at *3 (Ariz. Ct. App. July 13, 2010); and *Saint Alphonsus Diversified Care, Inc. v. MRI Associates, LLP*, 148 Idaho 479, 489, 224 P.3d 1068, 1078, 2009 WL 5252829 (2009).

Fees for the litigation occasioned by the breach of the partnership agreement and for wrongful dissolution are not accounting damages and require a jury. See, e.g., *Meyer v. Christie*, No. 07-2230-CM, 2009 WL 3294001, at *1 (D. Kan. Oct. 13, 2009); same on appeal *Meyer v. Christie*, 634 F.3d 1152, 1160–61, 2011 WL 873437 (10th Cir. 2011); *State Farm Fire & Cas. Co. v. Christie*, No. 10-CV-2699, 2015 WL 751808, at *3 (D. Kan. Feb. 23, 2015); *Cratte v. Estabrook*, No. 1 CA-CV 09-0239, 2010 WL 2773372, at *3 (Ariz. Ct. App. July 13, 2010); and *Saint Alphonsus Diversified Care, Inc. v. MRI Associates, LLP*, 148 Idaho 479, 489, 224 P.3d 1068, 1078, 2009 WL 5252829 (2009).

¹⁷ The claims here sound in tort. The attempt by Yusuf/United to convert all of the partnership was abject, unadulterated **conversion** – and additional, non-accounting monetary damages were pleaded. The Amended Complaint specifically asked, at item 7 of relief, for “[a]n award of compensatory damages against the defendants.”

Pursuant to the Rules of the Court, the supporting documents are the bills and payments for counsel -- which will be provided, and the fees determined, at the end of litigation.

C. Other Losses and Costs

Hamed, as the partner, also lost the value of:

(1) the Partnership's diminution of income, profits and time occasioned by the Yusuf taking and efforts to correct those. The supporting documents will be expert reports not yet due under the Discovery Plan.

(2) the costs of accountants and accounting experts to determine the amount that Yusuf took between 2006 and 2012. The supporting documents will be expert reports not yet due under the Discovery Plan.

(3) the costs of accountants and accounting experts to determine the amount that Yusuf took between 2012 and the end of the Partnership. The supporting documents will be expert reports not yet due under the Discovery Plan.

(4) the costs of 100% of Mr. Gaffney's fees to determine review the accounting as part of the Claims process. The supporting documents will be expert reports not yet due under the Discovery Plan.

(5) the damage to trade reputation occasioned by the Yusuf's acts and statements. The supporting documents will be expert reports not yet due under the Discovery Plan.

Dated: May 15, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2018, I served a copy of the foregoing by email (via CaseAnywhere) without the attached documents which were sent by USB Drive by Federal Express, as agreed by the parties, ***without the attached documents, which were made available by FTP Server that same day, as requested (DTF) or UPPS Mail (Eckard & Moorhead)***, as shown, on:

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Hamed's Response to Yusuf's RFPDs 1-24
Hamed v Yusuf, 12-cv-370
May 15, 2018

Document Bates Range	RFPD Numbers
BDO_008026-008027	01d-Waheed Hamed, 06-Waheed Hamed
HAMD610809-HAMD610810	01d-Hamed Brothers, 06-Hamed Brothers
HAMD611002-HAMD611004	01d-Hamed Brothers, 06-Hamed Brothers
HAMD610836-HAMD610837	01d-Hamed Brothers, 06-Hamed Brothers
HAMD611777-HAMD611777	01d-Mufeed Hamed
HAMD611780-HAMD611781	01d-Mufeed Hamed
HAMD611786-HAMD611787	01d-Mufeed Hamed
HAMD611784-HAMD611785	01d-Mufeed Hamed
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HAMD611775-HAMD611776	01d-Mufeed Hamed
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BDO_003156-003161	01d-Hisham Hamed
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HAMD610473-HAMD610476	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610207-HAMD610211	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610239-HAMD610243	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610421-HAMD610426	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610735-HAMD610740	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610795-HAMD610801	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610259-HAMD610262	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610159-HAMD610165	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610337-HAMD610341	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610406-HAMD610410	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610089-HAMD610093	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610827-HAMD610835	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610811-HAMD610817	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610141-HAMD610146	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610179-HAMD610185	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610195-HAMD610201	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610289-HAMD610293-	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610584-HAMD610589	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610323-HAMD610326	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610825-HAMD610826	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610166-HAMD610171	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610438-HAMD610442	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610696-HAMD610697	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610802-HAMD610808	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610359-HAMD610364	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610667-HAMD610672	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610673-HAMD610679	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610136-HAMD610140	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610332-HAMD610336	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610402-HAMD610405	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610186-HAMD610189	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610507-HAMD610512	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610781-HAMD61078	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610493-HAMD610497	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610458-HAMD610462	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610275-HAMD610279	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610300-HAMD610305	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610741-HAMD610746	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610443-HAMD610447	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610244-HAMD610248	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610747-HAMD610752	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610760-HAMD610766	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610254-HAMD610258	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610306-HAMD610312	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610212-HAMD610215	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610686-HAMD610690	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610172-HAMD610178	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610116-HAMD610121	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610691-HAMD610695	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610477-HAMD610481	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610147-HAMD610151	01d-Hisham Hamed, 06-Hisham Hamed

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HAMD610595-HAMD610600	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610327-HAMD610331	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610128-HAMD610135	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610228-HAMD610232	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610531-HAMD610536	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610223-HAMD610227	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610411-HAMD610415	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610249-HAMD610253	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610680-HAMD610685	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610488-HAMD610492	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610706-HAMD610711	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610559-HAMD610564	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610318-HAMD610322	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610590-HAMD610594	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610398-HAMD610401	01d-Hisham Hamed, 06-Hisham Hamed
HAMD607579-HAMD607581	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD607562-HAMD607565	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD607595-HAMD607597	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD607582-HAMD607584	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD611783-HAMD611783	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD607569-HAMD607571	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
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HAMD607572-HAMD607574	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
BDO_005520-005520	01d, Mufeed Hamed, 06-Mufeed Hamed
BDO_003213-003215	01d-Hamed Brothers, 06-Hamed Brothers
BDO_003209-003210	01d-Hamed Brothers, 06-Hamed Brothers
BDO_003211-003212	01d-Hamed Brothers, 06-Hamed Brothers
BDO_003216-003216	01d-Hamed Brothers, 06-Hamed Brothers
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BDO_005500-005510	01d-Mufeed Hamed, 06-Mufeed Hamed
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BDO_005490-005496	01d-Mufeed Hamed, 06-Mufeed Hamed
BDO_005497-005499	01d-Mufeed Hamed, 06-Mufeed Hamed
YUSF153499-YUSF153499	01d-Mufeed Hamed, Waleed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153482-YUSF153482	01d-Mufeed Hamed, Waleed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_004568-004570	01d-Mohammad Hamed
BDO_004512-004514	01d-Mohammad Hamed
BDO_004535-004538	01d-Mohammad Hamed
BDO_004598-004608	01d-Mohammad Hamed
BDO_004533-004534	01d-Mohammad Hamed
BDO_004577-004579	01d-Mohammad Hamed
BDO_004640-004649	01d-Mohammad Hamed
BDO_004687-004689	01d-Mohammad Hamed
BDO_004428-004429	01d-Mohammad Hamed
BDO_004574-004576	01d-Mohammad Hamed
BDO_004471-004472	01d-Mohammad Hamed
BDO_004684-004686	01d-Mohammad Hamed
BDO_004454-004455	01d-Mohammad Hamed
BDO_004539-004540	01d-Mohammad Hamed
BDO_004571-004573	01d-Mohammad Hamed
BDO_004677-004680	01d-Mohammad Hamed
BDO_004492-004494	01d-Mohammad Hamed
BDO_004696-004698	01d-Mohammad Hamed
BDO_004628-004633	01d-Mohammad Hamed
BDO_004690-004692	01d-Mohammad Hamed
BDO_004665-004667	01d-Mohammad Hamed
BDO_004521-004522	01d-Mohammad Hamed
BDO_004671-004673	01d-Mohammad Hamed
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BDO_004668-004670	01d-Mohammad Hamed
BDO_004440-004444	01d-Mohammad Hamed
BDO_004519-004520	01d-Mohammad Hamed
BDO_004430-004439	01d-Mohammad Hamed
BDO_004653-004661	01d-Mohammad Hamed
BDO_004495-004496	01d-Mohammad Hamed
BDO_004565-004567	01d-Mohammad Hamed
BDO_004543-004544	01d-Mohammad Hamed
BDO_004693-004695	01d-Mohammad Hamed
BDO_004699-004701	01d-Mohammad Hamed
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BDO_004458-004464	01d-Mohammad Hamed
BDO_004452-004453	01d-Mohammad Hamed
BDO_004545-004555	01d-Mohammad Hamed
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BDO_004456-004457	01d-Mohammad Hamed
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BDO_004623-004627	01d-Mohammad Hamed
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BDO_004527-004532	01d-Mohammad Hamed
BDO_004497-004498	01d-Mohammad Hamed
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BDO_004473-004474	01d-Mohammad Hamed
YUSF153860-YUSF153860	01d-Mohammad Hamed, Waleed Hamed
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BDO_002832-002833	01d-Hisham Hamed
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BDO_003222-003225	01d-Hisham Hamed, 06-Hisham Hamed
BDO_006819-006820	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003588-003592	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003526-003532	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610941-HAMD610946	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003540-003545	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002942-002948	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610869-HAMD610875	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003713-003716	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003605-003609	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003233-003240	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003566-003572	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002720-002729	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003274-003278	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003376-003380	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003546-003550	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614956-HAMD614959	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003691-003695	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002879-002884	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002911-002915	01d-Hisham Hamed, 06-Hisham Hamed

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BDO_003397-003400	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003644-003648	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003620-003625	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002949-002955	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003705-003706	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610857-HAMD610861	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610838-HAMD610840	01d-Hisham Hamed, 06-Hisham Hamed, 06-Hisham Hamed
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YUSF153804-YUSF153804	01d-Hisham Hamed, Waleed Hamed, 06-Waleed Hamed, Hisham Hamed
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Document Bates Range	RFPD Numbers
YUSF154028-YUSF154028	01d-Waleed Hamed
YUSF153345-YUSF153348	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153178-YUSF153178	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154397-YUSF154397	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153323-YUSF153323	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153716-YUSF153716	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104911-YUSF104922	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153176-YUSF153176	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154295-YUSF154295	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154223-YUSF154223	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153132-YUSF153132	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154339-YUSF154339	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153982-YUSF153982	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153357-YUSF153357	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153138-YUSF153138	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153120-YUSF153120	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153529-YUSF153529	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153253-YUSF153253	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153317-YUSF153317	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153612-YUSF153614	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153686-YUSF153686	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153646-YUSF153646	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154389-YUSF154389	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153256-YUSF153256	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153272-YUSF153272	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153372-YUSF153372	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153691-YUSF153691	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154417-YUSF154417	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153615-YUSF153615	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104326-YUSF104431	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153463-YUSF153463	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154286-YUSF154286	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154135-YUSF154135	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154344-YUSF154344	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153726-YUSF153726	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153697-YUSF153697	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154396-YUSF154396	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153124-YUSF153124	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153223-YUSF153223	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153587-YUSF153587	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154336-YUSF154336	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154369-YUSF154369	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153245-YUSF153245	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153143-YUSF153143	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153284-YUSF153284	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154368-YUSF154368	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153610-YUSF153610	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153746-YUSF153746	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153374-YUSF153374	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154415-YUSF154415	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153618-YUSF153618	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153794-YUSF153794	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153354-YUSF153354	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153148-YUSF153148	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153816-YUSF153816	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154202-YUSF154202	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154167-YUSF154167	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153736-YUSF153736	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153398-YUSF153401	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153367-YUSF153367	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154435-YUSF154435	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154345-YUSF154345	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153649-YUSF153649	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154382-YUSF154382	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154343-YUSF154343	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153122-YUSF153122	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154325-YUSF154325	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154362-YUSF154362	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153800-YUSF153800	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153126-YUSF1531	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154365-YUSF154365	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153553-YUSF153553	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153542-YUSF153542	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153310-YUSF153310	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153151-YUSF153151	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154126-YUSF154126	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF154256-YUSF154256	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153198-YUSF153198	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154234-YUSF154234	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153468-YUSF153470	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153350-YUSF153350	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154319-YUSF154319	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154398-YUSF154398	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153160-YUSF153160	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154211-YUSF154211	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153227-YUSF153228	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154403-YUSF154403	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF104928-YUSF104939	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153709-YUSF153709	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154131-YUSF154132	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154304-YUSF154304	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153219-YUSF153219	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153447-YUSF153447	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154305-YUSF154305	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153785-YUSF153785	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153699-YUSF153699	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154272-YUSF154272	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153623-YUSF153625	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154157-YUSF154157	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153632-YUSF153632	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153560-YUSF153560	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153129-YUSF153129	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154197-YUSF154197	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153221-YUSF153222	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154316-YUSF154316	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153707-YUSF153707	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153137-YUSF153137	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153108-YUSF153108	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153525-YUSF153525	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153274-YUSF153274	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153166-YUSF153166	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154347-YUSF154347	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154299-YUSF154299	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153828-YUSF153828	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153558-YUSF153558	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154410-YUSF154410	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154158-YUSF154160	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153735-YUSF153735	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153597-YUSF153600	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153238-YUSF153238	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153943-YUSF153943	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153252-YUSF153252	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153703-YUSF153703	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154260-YUSF154260	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153645-YUSF153645	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153593-YUSF153593	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153249-YUSF153249	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153760-YUSF153762	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153254-YUSF153254	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153459-YUSF153461	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154187-YUSF154187	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153152-YUSF153152	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154306-YUSF154306	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154203-YUSF154203	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153207-YUSF153208	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153968-YUSF153968	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153594-YUSF153594	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154414-YUSF154414	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153759-YUSF153759	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154186-YUSF154186	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153904-YUSF153904	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153195-YUSF153195	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153141-YUSF153141	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153243-YUSF153243	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154381-YUSF154381	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153580-YUSF153580	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154219-YUSF154219	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153306-YUSF153307	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153186-YUSF153186	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153230-YUSF153230	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153275-YUSF153275	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154137-YUSF154137	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154429-YUSF154429	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153766-YUSF153766	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154239-YUSF154239	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153405-YUSF153405	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154330-YUSF154330	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153824-YUSF153824	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153376-YUSF153376	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153210-YUSF153210	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF154360-YUSF154360	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153835-YUSF153837	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154334-YUSF154334	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154205-YUSF154207	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153751-YUSF153751	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153592-YUSF153592	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153209-YUSF153209	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154134-YUSF154134	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153308-YUSF153308	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154224-YUSF154224	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153455-YUSF153455	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154021-YUSF154021	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153820-YUSF153820	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153819-YUSF153819	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153662-YUSF153662	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154373-YUSF154373	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153200-YUSF153202	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153349-YUSF153349	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153353-YUSF153353	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153415-YUSF153415	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154279-YUSF154279	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153595-YUSF153595	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153689-YUSF153689	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154209-YUSF154209	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154424-YUSF154424	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153530-YUSF153530	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153544-YUSF153546	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153605-YUSF153605	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153322-YUSF153322	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154174-YUSF154174	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153237-YUSF153237	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154230-YUSF154230	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154401-YUSF154401	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153563-YUSF153565	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153396-YUSF153396	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153416-YUSF153416	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154386-YUSF154388	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153658-YUSF153658	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153342-YUSF153342	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154136-YUSF154136	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153797-YUSF153797	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153277-YUSF153279	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153300-YUSF153300	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153714-YUSF153714	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153506-YUSF153506	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154194-YUSF154194	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153763-YUSF153763	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153682-YUSF153682	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153417-YUSF153417	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154383-YUSF154383	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153335-YUSF153336	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153695-YUSF153695	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153517-YUSF153517	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153489-YUSF153489	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153333-YUSF153333	01d-Waleed Hamed, 06-Waleed Hamed
YUSF105001-YUSF105012	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153738-YUSF153738	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153549-YUSF153549	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153187-YUSF153187	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154222-YUSF154222	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153780-YUSF153780	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154416-YUSF154416	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153288-YUSF153288	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154264-YUSF154265	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154274-YUSF154274	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153164-YUSF153164	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153516-YUSF153516	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153214-YUSF153214	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153185-YUSF153185	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153536-YUSF153536	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154280-YUSF154280	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154236-YUSF154236	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154395-YUSF154395	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154253-YUSF154253	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154380-YUSF154380	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153875-YUSF153875	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153299-YUSF153299	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154375-YUSF154375	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153696-YUSF153696	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153381-YUSF153381	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154337-YUSF154338	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153167-YUSF153167	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154289-YUSF154289	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153825-YUSF153825	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF104957-YUSF104968	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153291-YUSF153291	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154399-YUSF154399	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153255-YUSF153255	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154249-YUSF154249	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153395-YUSF153395	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153263-YUSF153264	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153269-YUSF153269	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153259-YUSF153259	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153787-YUSF153787	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154168-YUSF154168	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153334-YUSF153334	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153701-YUSF153701	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154278-YUSF154278	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153548-YUSF153548	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153581-YUSF153581	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154193-YUSF154193	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153388-YUSF153388	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154321-YUSF154321	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153343-YUSF153343	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154144-YUSF154144	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153155-YUSF153155	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153996-YUSF153996	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154254-YUSF154254	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153242-YUSF153242	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153331-YUSF153331	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153680-YUSF153680	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153103-YUSF153103	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154405-YUSF154405	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153732-YUSF153732	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153363-YUSF153363	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154178-YUSF154180	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153332-YUSF153332	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153371-YUSF153371	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154402-YUSF154402	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153512-YUSF153512	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154215-YUSF154217	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153537-YUSF153537	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154394-YUSF154394	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154235-YUSF154235	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153428-YUSF153428	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154317-YUSF154317	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153722-YUSF153724	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153515-YUSF153515	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154201-YUSF154201	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153297-YUSF153297	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154162-YUSF154162	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153403-YUSF153403	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153639-YUSF153639	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104943-YUSF104954	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153737-YUSF153737	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153196-YUSF153196	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154346-YUSF154346	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153404-YUSF153404	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153796-YUSF153796	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153524-YUSF153524	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153769-YUSF153769	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153661-YUSF153661	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153177-YUSF153177	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153519-YUSF153521	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153172-YUSF153172	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154328-YUSF154329	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154074-YUSF154074	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153339-YUSF153339	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153502-YUSF153502	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153192-YUSF153192	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153351-YUSF153351	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153168-YUSF153168	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154115-YUSF154115	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153390-YUSF153390	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153629-YUSF153629	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153777-YUSF153777	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154145-YUSF154145	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153321-YUSF153321	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153250-YUSF153250	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153588-YUSF153588	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153601-YUSF153601	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153571-YUSF153571	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154102-YUSF154102	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154404-YUSF154404	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153130-YUSF153130	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104971-YUSF104982	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153142-YUSF153142	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153640-YUSF153640	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153359-YUSF153359	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153679-YUSF153679	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153473-YUSF153473	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154213-YUSF154213	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154188-YUSF154190	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153457-YUSF153457	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154208-YUSF154208	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154379-YUSF154379	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153633-YUSF153633	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153556-YUSF153556	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153890-YUSF153890	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153273-YUSF153273	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154358-YUSF154358	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153432-YUSF153432	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154390-YUSF154390	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154350-YUSF154351	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153338-YUSF153338	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153864-YUSF153864	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154385-YUSF154385	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153770-YUSF153770	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153235-YUSF153235	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153197-YUSF153197	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153504-YUSF153504	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154301-YUSF154302	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153194-YUSF153194	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153320-YUSF153320	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153757-YUSF153757	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153518-YUSF153518	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154288-YUSF154288	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154151-YUSF154151	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154430-YUSF154430	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154393-YUSF154393	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153282-YUSF153282	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154407-YUSF154409	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153373-YUSF153373	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154308-YUSF154309	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153720-YUSF153720	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154266-YUSF154266	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153182-YUSF153184	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154165-YUSF154165	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153203-YUSF153203	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153648-YUSF153648	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153743-YUSF153745	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154296-YUSF154296	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153475-YUSF153475	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154326-YUSF154326	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153154-YUSF153154	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153438-YUSF153438	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154285-YUSF154285	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153368-YUSF153368	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153311-YUSF153311	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153229-YUSF153229	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153140-YUSF153140	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154240-YUSF154240	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154036-YUSF154036	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154182-YUSF154182	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153239-YUSF153240	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153352-YUSF153352	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153327-YUSF153327	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153429-YUSF153429	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154281-YUSF154281	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153764-YUSF153764	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153477-YUSF153479	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153384-YUSF153385	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153113-YUSF153115	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153628-YUSF153628	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154291-YUSF154293	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153110-YUSF153110	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153706-YUSF153706	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154294-YUSF154294	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153261-YUSF153261	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153213-YUSF153213	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154175-YUSF154175	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153319-YUSF153319	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154192-YUSF154192	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153101-YUSF153101	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154148-YUSF154150	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153382-YUSF153382	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153659-YUSF153659	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154218-YUSF154218	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154307-YUSF154307	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153685-YUSF153685	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153660-YUSF153660	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153768-YUSF153768	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153818-YUSF153818	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153365-YUSF153365	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153330-YUSF153330	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153441-YUSF153441	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153606-YUSF153606	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153361-YUSF153361	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153503-YUSF153503	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153366-YUSF153366	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153651-YUSF153654	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154138-YUSF154138	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154333-YUSF154333	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154184-YUSF154184	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153783-YUSF153783	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153173-YUSF153175	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154283-YUSF154284	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154392-YUSF154392	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153671-YUSF153673	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154341-YUSF154341	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154275-YUSF154277	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154269-YUSF154270	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153270-YUSF153271	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153111-YUSF153111	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153609-YUSF153609	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153508-YUSF153510	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153292-YUSF153292	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153781-YUSF153781	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153755-YUSF153755	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153647-YUSF153647	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153211-YUSF153211	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154332-YUSF154332	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153492-YUSF153492	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153309-YUSF153309	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153188-YUSF153188	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153741-YUSF153741	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154367-YUSF154367	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153531-YUSF153531	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153375-YUSF153375	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154127-YUSF154127	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154238-YUSF154238	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153700-YUSF153700	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153302-YUSF153302	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153557-YUSF153557	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153611-YUSF153611	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154310-YUSF154310	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153377-YUSF153378	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153742-YUSF153742	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153782-YUSF153782	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154261-YUSF154261	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153809-YUSF153809	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154436-YUSF154436	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153280-YUSF153280	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153466-YUSF153466	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154431-YUSF154431	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153496-YUSF153496	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154022-YUSF154022	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154400-YUSF154400	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153453-YUSF153453	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154320-YUSF154320	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153784-YUSF153784	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153231-YUSF153231	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153215-YUSF153216	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153102-YUSF153102	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153579-YUSF153579	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153526-YUSF153526	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153471-YUSF153471	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154357-YUSF154357	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153408-YUSF153408	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153358-YUSF153358	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154432-YUSF154432	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153409-YUSF153411	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154063-YUSF154063	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153246-YUSF153248	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153756-YUSF153756	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153501-YUSF153501	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154164-YUSF154164	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153257-YUSF153258	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154212-YUSF154212	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153236-YUSF153236	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154352-YUSF154352	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153753-YUSF153753	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153150-YUSF153150	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153283-YUSF153283	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154298-YUSF154298	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153814-YUSF153814	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153789-YUSF153791	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153133-YUSF153133	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153801-YUSF153801	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153218-YUSF153218	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153324-YUSF153324	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154378-YUSF154378	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153582-YUSF153582	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153326-YUSF153326	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153681-YUSF153681	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153179-YUSF153179	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153109-YUSF153109	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153134-YUSF153136	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154340-YUSF154340	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153650-YUSF153650	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154195-YUSF154195	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153813-YUSF153813	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153788-YUSF153788	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153298-YUSF153298	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153144-YUSF153146	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154303-YUSF154303	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153665-YUSF153665	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153391-YUSF153391	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154185-YUSF154185	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153589-YUSF153589	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153149-YUSF153149	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154342-YUSF154342	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154425-YUSF154425	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153325-YUSF153325	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153823-YUSF153823	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF154169-YUSF154169	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153668-YUSF153668	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153190-YUSF153191	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153488-YUSF153488	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153617-YUSF153617	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153547-YUSF153547	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153619-YUSF153619	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153379-YUSF153379	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153169-YUSF153171	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153666-YUSF153666	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153795-YUSF153795	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154297-YUSF154297	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153698-YUSF153698	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154247-YUSF154247	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153189-YUSF153189	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153683-YUSF153683	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153301-YUSF153301	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153407-YUSF153407	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153117-YUSF153117	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153704-YUSF153704	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153290-YUSF153290	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153708-YUSF153708	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154377-YUSF154377	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154322-YUSF154322	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154191-YUSF154191	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153523-YUSF153523	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154129-YUSF154129	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154335-YUSF154335	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153607-YUSF153607	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153472-YUSF153472	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153156-YUSF153156	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154438-YUSF154438	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153675-YUSF153675	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153644-YUSF153644	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154267-YUSF154267	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153641-YUSF153641	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153225-YUSF153225	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153285-YUSF153286	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154220-YUSF154220	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153554-YUSF153554	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154133-YUSF154133	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154177-YUSF154177	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154139-YUSF154139	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153569-YUSF153569	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154376-YUSF154376	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154007-YUSF154007	01d-Waleed Hamed, 06-Waleed Hamed
HAMD625008-HAMD625097	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154348-YUSF154349	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153638-YUSF153638	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153443-YUSF153443	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153490-YUSF153490	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153715-YUSF153715	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153839-YUSF153841	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153710-YUSF153712	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153267-YUSF153267	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153118-YUSF153118	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154242-YUSF154244	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154300-YUSF154300	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153889-YUSF153889	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF154128-YUSF154128	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153590-YUSF153590	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153287-YUSF153287	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154413-YUSF154413	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153484-YUSF153484	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154418-YUSF154418	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154143-YUSF154143	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154364-YUSF154364	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154323-YUSF154323	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153561-YUSF153561	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154225-YUSF154227	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153810-YUSF153812	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153476-YUSF153476	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153181-YUSF153181	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153448-YUSF153452	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154246-YUSF154246	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153532-YUSF153534	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153294-YUSF153294	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153807-YUSF153807	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153591-YUSF153591	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153341-YUSF153341	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153386-YUSF153386	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154312-YUSF154312	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153165-YUSF153165	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154437-YUSF154437	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153802-YUSF153802	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153688-YUSF153688	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154257-YUSF154258	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153773-YUSF153773	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153570-YUSF153570	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154153-YUSF154153	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153793-YUSF153793	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153538-YUSF153538	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154287-YUSF154287	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154442-YUSF154442	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153260-YUSF153260	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153314-YUSF153315	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153541-YUSF153541	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154255-YUSF154255	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153817-YUSF153817	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153281-YUSF153281	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154146-YUSF154146	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154384-YUSF154384	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153635-YUSF153637	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154439-YUSF154440	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153157-YUSF153157	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153316-YUSF153316	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154406-YUSF154406	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153566-YUSF153566	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154171-YUSF154173	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153125-YUSF153125	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153147-YUSF153147	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153153-YUSF153153	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154282-YUSF154282	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154140-YUSF154140	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154241-YUSF154241	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153486-YUSF153486	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154152-YUSF154152	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154198-YUSF154198	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153161-YUSF153163	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153119-YUSF153119	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154130-YUSF154130	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153265-YUSF153265	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153206-YUSF153206	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153430-YUSF153430	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154141-YUSF154141	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154232-YUSF154233	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154361-YUSF154361	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153827-YUSF153827	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154156-YUSF154156	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154426-YUSF154428	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154268-YUSF154268	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153193-YUSF153193	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154354-YUSF154356	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153205-YUSF153205	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153572-YUSF153572	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153304-YUSF153304	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153104-YUSF153106	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153303-YUSF153303	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153412-YUSF153412	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154229-YUSF154229	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153406-YUSF153406	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153420-YUSF153420	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153266-YUSF153266	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153850-YUSF153850	01d-Waleed Hamed, 06-Waleed Hamed
YUSF105410-YUSF105410	01d-Waleed Hamed, 11
YUSF240322-YUSF240328	01d-Waleed Hamed, Mufeed Hamed
YUSF153774-YUSF153774	01d-Waleed Hamed, Mufeed Hamed
YUSF153792-YUSF153792	01d-Waleed Hamed, Mufeed Hamed
YUSF153808-YUSF153808	01d-Waleed Hamed, Mufeed Hamed 06-Waleed Hamed, Mufeed Hamed
HAMD615299-HAMD615365	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615366-HAMD615369	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615101-HAMD615101	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615163-HAMD615234	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615056-HAMD615100	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615102-HAMD615162	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed

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Document Bates Range	RFPD Numbers
HAMD615235-HAMD615298	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD607592-HAMD607594	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615370-HAMD615426	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615470-HAMD615470	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615027-HAMD615055	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615427-HAMD615456	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
YUSF153676-YUSF153676	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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YUSF153805-YUSF153805	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153733-YUSF153733	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_008006-008022	01d-Waheed Hamed, 06-Waheed Hamed
HAMD625098-HAMD625114	01d-Waheed Hamed, 06-Waheed Hamed
YUSF104586-YUSF104683	01, Waleed Hamed, 06-Waleed Hamed
HAMD209806-HAMD209809	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012845-012845	01-Waleed Hamed, 06-Waleed Hamed
BDO_012801-012801	01-Waleed Hamed, 06-Waleed Hamed
BDO_010998-011007	01-Waleed Hamed, 06-Waleed Hamed
HAMD623090-HAMD623337	01-Waleed Hamed, 06-Waleed Hamed
BDO_010023-010032	01-Waleed Hamed, 06-Waleed Hamed
BDO_011260-011264	01-Waleed Hamed, 06-Waleed Hamed
BDO_009604-009613	01-Waleed Hamed, 06-Waleed Hamed
HAMD618735-HAMD618926	01-Waleed Hamed, 06-Waleed Hamed
BDO_011088-011097	01-Waleed Hamed, 06-Waleed Hamed
BDO_014936-014936	01-Waleed Hamed, 06-Waleed Hamed
BDO_012929-012936	01-Waleed Hamed, 06-Waleed Hamed
BDO_015336-015336	01-Waleed Hamed, 06-Waleed Hamed
HAMD209762-HAMD209764	01-Waleed Hamed, 06-Waleed Hamed
BDO_010679-010692	01-Waleed Hamed, 06-Waleed Hamed
BDO_012858-012858	01-Waleed Hamed, 06-Waleed Hamed
BDO_012840-012840	01-Waleed Hamed, 06-Waleed Hamed
BDO_012825-012825	01-Waleed Hamed, 06-Waleed Hamed

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BDO_011379-011383	01-Waleed Hamed, 06-Waleed Hamed
BDO_009268-009271	01-Waleed Hamed, 06-Waleed Hamed
BDO_014887-014887	01-Waleed Hamed, 06-Waleed Hamed
BDO_010847-010856	01-Waleed Hamed, 06-Waleed Hamed
BDO_014935-014935	01-Waleed Hamed, 06-Waleed Hamed
BDO_013057-013070	01-Waleed Hamed, 06-Waleed Hamed
BDO_015364-015364	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009730-009737	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015107-015108	01-Waleed Hamed, 06-Waleed Hamed
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HAMD624248-HAMD624321	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012795-012795	01-Waleed Hamed, 06-Waleed Hamed
BDO_012803-012803	01-Waleed Hamed, 06-Waleed Hamed
BDO_010151-010159	01-Waleed Hamed, 06-Waleed Hamed
BDO_011038-011047	01-Waleed Hamed, 06-Waleed Hamed
BDO_010318-010321	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015328-015328	01-Waleed Hamed, 06-Waleed Hamed
BDO_014937-014937	01-Waleed Hamed, 06-Waleed Hamed
BDO_015330-015330	01-Waleed Hamed, 06-Waleed Hamed
BDO_011255-011259	01-Waleed Hamed, 06-Waleed Hamed
HAMD621847-HAMD622378	01-Waleed Hamed, 06-Waleed Hamed
BDO_010239-010243	01-Waleed Hamed, 06-Waleed Hamed
BDO_014890-014890	01-Waleed Hamed, 06-Waleed Hamed
BDO_013338-013349	01-Waleed Hamed, 06-Waleed Hamed
BDO_012799-012799	01-Waleed Hamed, 06-Waleed Hamed
HAMD616835-HAMD616966	01-Waleed Hamed, 06-Waleed Hamed
HAMD617775-HAMD618006	01-Waleed Hamed, 06-Waleed Hamed

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BDO_010260-010264	01-Waleed Hamed, 06-Waleed Hamed
BDO_014897-014897	01-Waleed Hamed, 06-Waleed Hamed
BDO_011364-011368	01-Waleed Hamed, 06-Waleed Hamed
HAMD440562-HAMD440569	01-Waleed Hamed, 06-Waleed Hamed
BDO_012792-012792	01-Waleed Hamed, 06-Waleed Hamed
BDO_009457-009466	01-Waleed Hamed, 06-Waleed Hamed
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BDO_013011-013034	01-Waleed Hamed, 06-Waleed Hamed
BDO_013197-013204	01-Waleed Hamed, 06-Waleed Hamed
BDO_010928-010937	01-Waleed Hamed, 06-Waleed Hamed
BDO_009467-009474	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012945-012964	01-Waleed Hamed, 06-Waleed Hamed
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BDO_011212-011216	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010484-010491	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
BDO_012809-012809	01-Waleed Hamed, 06-Waleed Hamed
BDO_013274-013281	01-Waleed Hamed, 06-Waleed Hamed
BDO_012800-012800	01-Waleed Hamed, 06-Waleed Hamed
BDO_013361-013373	01-Waleed Hamed, 06-Waleed Hamed
BDO_015165-015166	01-Waleed Hamed, 06-Waleed Hamed
BDO_011194-011199	01-Waleed Hamed, 06-Waleed Hamed
BDO_010077-010086	01-Waleed Hamed, 06-Waleed Hamed
BDO_012794-012794	01-Waleed Hamed, 06-Waleed Hamed
HAMD622912-HAMD623089	01-Waleed Hamed, 06-Waleed Hamed
BDO_015560-015560	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010747-010756	01-Waleed Hamed, 06-Waleed Hamed
BDO_011217-011221-BDO2016-10	01-Waleed Hamed, 06-Waleed Hamed
BDO_009689-009696	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015326-015326	01-Waleed Hamed, 06-Waleed Hamed
BDO_013035-013056	01-Waleed Hamed, 06-Waleed Hamed
BDO_009959-009970	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
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BDO_012844-012844	01-Waleed Hamed, 06-Waleed Hamed
BDO_009566-009575	01-Waleed Hamed, 06-Waleed Hamed
BDO_010250-010254	01-Waleed Hamed, 06-Waleed Hamed
BDO_011200-011205	01-Waleed Hamed, 06-Waleed Hamed
BDO_012867-012867	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012807-012807	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010221-010228	01-Waleed Hamed, 06-Waleed Hamed
BDO_009479-009488	01-Waleed Hamed, 06-Waleed Hamed
HAMD618275-HAMD618542	01-Waleed Hamed, 06-Waleed Hamed
BDO_012997-013010	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010565-010572	01-Waleed Hamed, 06-Waleed Hamed

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BDO_015379-015379	01-Waleed Hamed, 06-Waleed Hamed
BDO_011346-011350	01-Waleed Hamed, 06-Waleed Hamed
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BDO_011338-011341-BDO2016	01-Waleed Hamed, 06-Waleed Hamed
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HAMD623904-HAMD624077	01-Waleed Hamed, 06-Waleed Hamed
BDO_009181-009194	01-Waleed Hamed, 06-Waleed Hamed
HAMD616599-HAMD616702	01-Waleed Hamed, 06-Waleed Hamed
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BDO_013264-013273	01-Waleed Hamed, 06-Waleed Hamed
HAMD616596-HAMD616598	01-Waleed Hamed, 06-Waleed Hamed
BDO_010777-010786	01-Waleed Hamed, 06-Waleed Hamed

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BDO_014859-014859	01-Waleed Hamed, 06-Waleed Hamed
BDO_015103-015104	01-Waleed Hamed, 06-Waleed Hamed
BDO_012862-012862	01-Waleed Hamed, 06-Waleed Hamed
BDO_009665-009672	01-Waleed Hamed, 06-Waleed Hamed
BDO_009594-009603	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
HAMD619443-HAMD619670	01-Waleed Hamed, 06-Waleed Hamed
BDO_011299-011302	01-Waleed Hamed, 06-Waleed Hamed
BDO_015335-015335	01-Waleed Hamed, 06-Waleed Hamed
BDO_012791-012791	01-Waleed Hamed, 06-Waleed Hamed
BDO_015195-015196	01-Waleed Hamed, 06-Waleed Hamed
BDO_012816-012816	01-Waleed Hamed, 06-Waleed Hamed
BDO_010278-010281	01-Waleed Hamed, 06-Waleed Hamed
BDO_010119-010130	01-Waleed Hamed, 06-Waleed Hamed
BDO_015115-015116	01-Waleed Hamed, 06-Waleed Hamed
BDO_012837-012837	01-Waleed Hamed, 06-Waleed Hamed
BDO_011471-011476	01-Waleed Hamed, 06-Waleed Hamed
HAMD616592-HAMD616595	01-Waleed Hamed, 06-Waleed Hamed
BDO_014992-014992	01-Waleed Hamed, 06-Waleed Hamed
BDO_010968-010977	01-Waleed Hamed, 06-Waleed Hamed
BDO_011424-011428	01-Waleed Hamed, 06-Waleed Hamed
BDO_012832-012832	01-Waleed Hamed, 06-Waleed Hamed
BDO_010595-010602	01-Waleed Hamed, 06-Waleed Hamed
BDO_013233-013240	01-Waleed Hamed, 06-Waleed Hamed
BDO_012788-012788	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015561-015561	01-Waleed Hamed, 06-Waleed Hamed
BDO_010737-010746	01-Waleed Hamed, 06-Waleed Hamed
HAMD209829-HAMD209831	01-Waleed Hamed, 06-Waleed Hamed
BDO_011240-011244	01-Waleed Hamed, 06-Waleed Hamed
BDO_012863-012863	01-Waleed Hamed, 06-Waleed Hamed
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BDO_014993-014993	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010878-010887	01-Waleed Hamed, 06-Waleed Hamed
BDO_009212-009214	01-Waleed Hamed, 06-Waleed Hamed
BDO_010302-010305	01-Waleed Hamed, 06-Waleed Hamed

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BDO_009634-009641	01-Waleed Hamed, 06-Waleed Hamed
BDO_009221-009224	01-Waleed Hamed, 06-Waleed Hamed
BDO_012574-012585	01-Waleed Hamed, 06-Waleed Hamed
BDO_014934-014934	01-Waleed Hamed, 06-Waleed Hamed
BDO_010208-010212	01-Waleed Hamed, 06-Waleed Hamed
BDO_009234-009239	01-Waleed Hamed, 06-Waleed Hamed
BDO_009240-009242	01-Waleed Hamed, 06-Waleed Hamed
HAMD624078-HAMD624247	01-Waleed Hamed, 06-Waleed Hamed
HAMD617583-HAMD617774	01-Waleed Hamed, 06-Waleed Hamed
BDO_012811-012811	01-Waleed Hamed, 06-Waleed Hamed
BDO_010229-010238	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009225-009227	01-Waleed Hamed, 06-Waleed Hamed
BDO_013451-013468	01-Waleed Hamed, 06-Waleed Hamed
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HAMD209771-HAMD209773	01-Waleed Hamed, 06-Waleed Hamed
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YUSF104687-YUSF104714	01-Waleed Hamed, 06-Waleed Hamed
BDO_009215-009220	01-Waleed Hamed, 06-Waleed Hamed
BDO_012864-012864	01-Waleed Hamed, 06-Waleed Hamed

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BDO_009280-009283	01-Waleed Hamed, 06-Waleed Hamed
BDO_012777-012777	01-Waleed Hamed, 06-Waleed Hamed
BDO_010436-010443	01-Waleed Hamed, 06-Waleed Hamed
BDO_011008-011017	01-Waleed Hamed, 06-Waleed Hamed
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Document Bates Range	RFPD Numbers
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HAMD618007-HAMD618274	01-Waleed Hamed, 06-Waleed Hamed
BDO_010476-010483	01-Waleed Hamed, 06-Waleed Hamed
HAMD621083-HAMD621322	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009714-009721	01-Waleed Hamed, 06-Waleed Hamed
HAMD616967-HAMD617158	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010573-010580	01-Waleed Hamed, 06-Waleed Hamed
BDO_012847-012847	01-Waleed Hamed, 06-Waleed Hamed
BDO_009888-009895	01-Waleed Hamed, 06-Waleed Hamed
BDO_011360-011363	01-Waleed Hamed, 06-Waleed Hamed

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BDO_009642-009651	01-Waleed Hamed, 06-Waleed Hamed
BDO_015324-015324	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010378-010387	01-Waleed Hamed, 06-Waleed Hamed
HAMD621323-HAMD621846	01-Waleed Hamed, 06-Waleed Hamed
BDO_010517-010524	01-Waleed Hamed, 06-Waleed Hamed
HAMD616479-HAMD616481	01-Waleed Hamed, 06-Waleed Hamed
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BDO_014995-014995	01-Waleed Hamed, 06-Waleed Hamed
BDO_013224-013232	01-Waleed Hamed, 06-Waleed Hamed
BDO_005706-005708	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006085-006087	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005835-005840	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_006000-006006	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_006044-006049	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005724-005727	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005890-005897	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005774-005775	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005736-005740	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005709-005712	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006074-006078	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005676-005678	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005853-005857	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006007-006009	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005898-005901	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006017-006020	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005691-005693	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_005664-005667	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006026-006031	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006065-006070	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005971-005974	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005869-005871	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005987-005989	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005926-005932	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005681-005681	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005694-005696	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006092-006094	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006071-006073	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005762-005765	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005939-005946	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005697-005700	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_007269-007274	01-Waleed Hamed, Waheed Hamed, 06-Waleed Hamed, Waheed Hamed
FBIX337329-FBIX338478	01-Waleed Hamed, Waheed Hamed, 06-Waleed Hamed, Waheed Hamed
BDO_007664-007665	01-Waheed Hamed, 06-Waheed Hamed
BDO_007645-007650	01-Waheed Hamed, 06-Waheed Hamed
BDO_007436-007439	01-Waheed Hamed, 06-Waheed Hamed
HAMD305287-HAMD305290	01-Waheed Hamed, 06-Waheed Hamed
BDO_007583-007586	01-Waheed Hamed, 06-Waheed Hamed
BDO_007420-007423	01-Waheed Hamed, 06-Waheed Hamed
BDO_007448-007451	01-Waheed Hamed, 06-Waheed Hamed
BDO_007596-007600	01-Waheed Hamed, 06-Waheed Hamed
BDO_007628-007628	01-Waheed Hamed, 06-Waheed Hamed
HAMD277551-HAMD277552	01-Waheed Hamed, 06-Waheed Hamed
BDO_007352-007356	01-Waheed Hamed, 06-Waheed Hamed
HAMD305346-HAMD305346	01-Waheed Hamed, 06-Waheed Hamed
BDO_007283-007287	01-Waheed Hamed, 06-Waheed Hamed
HAMD405240-HAMD405243	01-Waheed Hamed, 06-Waheed Hamed
HAMD306173-HAMD306173	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007679-007684	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007638-007639	01-Waheed Hamed, 06-Waheed Hamed
HAMD305366-HAMD305369	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007428-007431	01-Waheed Hamed, 06-Waheed Hamed
HAMD405203-HAMD405207	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007616-007620	01-Waheed Hamed, 06-Waheed Hamed
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FBIX262192-FBIX262194	01-Waheed Hamed, 06-Waheed Hamed
HAMD405213-HAMD405213	01-Waheed Hamed, 06-Waheed Hamed
BDO_007499-007502	01-Waheed Hamed, 06-Waheed Hamed
HAMD305388-HAMD305392	01-Waheed Hamed, 06-Waheed Hamed
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HAMD405214-HAMD405217	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007549-007553	01-Waheed Hamed, 06-Waheed Hamed
BDO_007627-007627	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007626-007626	01-Waheed Hamed, 06-Waheed Hamed
BDO_007432-007435	01-Waheed Hamed, 06-Waheed Hamed
HAMD305360-HAMD305363	01-Waheed Hamed, 06-Waheed Hamed
BDO_007440-007443	01-Waheed Hamed, 06-Waheed Hamed
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HAMD305347-HAMD305350	01-Waheed Hamed, 06-Waheed Hamed
BDO_007607-007611	01-Waheed Hamed, 06-Waheed Hamed
BDO_007539-007543	01-Waheed Hamed, 06-Waheed Hamed
BDO_007703-007705	01-Waheed Hamed, 06-Waheed Hamed
HAMD305351-HAMD305354	01-Waheed Hamed, 06-Waheed Hamed
BDO_007424-007427	01-Waheed Hamed, 06-Waheed Hamed
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HAMD278441-HAMD278441	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007706-007708	01-Waheed Hamed, 06-Waheed Hamed
BDO_007544-007548	01-Waheed Hamed, 06-Waheed Hamed
BDO_007700-007702	01-Waheed Hamed, 06-Waheed Hamed
HAMD405218-HAMD405218	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007554-007557	01-Waheed Hamed, 06-Waheed Hamed
BDO_007389-007393	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007673-007678	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007494-007498	01-Waheed Hamed, 06-Waheed Hamed
BDO_007357-007361	01-Waheed Hamed, 06-Waheed Hamed
BDO_007604-007606	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007444-007447	01-Waheed Hamed, 06-Waheed Hamed
BDO_007473-007473	01-Waheed Hamed, 06-Waheed Hamed
FBIX262447-FBIX262467	01-Waheed Hamed, 06-Waheed Hamed
BDO_007653-007658	01-Waheed Hamed, 06-Waheed Hamed
BDO_007575-007578	01-Waheed Hamed, 06-Waheed Hamed
BDO_007612-007615	01-Waheed Hamed, 06-Waheed Hamed
BDO_007399-007402	01-Waheed Hamed, 06-Waheed Hamed
BDO_007525-007528	01-Waheed Hamed, 06-Waheed Hamed
BDO_007474-007479	01-Waheed Hamed, 06-Waheed Hamed
BDO_007503-007507	01-Waheed Hamed, 06-Waheed Hamed
BDO_007489-007493	01-Waheed Hamed, 06-Waheed Hamed
BDO_007513-007518	01-Waheed Hamed, 06-Waheed Hamed
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HAMD594603-HAMD594673	4
HAMD594674-HAMD594675	4
HAMD629722-HAMD630014	04, 06-Waleed Hamed, 07, 21
HAMD612386-HAMD612642	04, 06-Waleed Hamed, 07, 21
HAMD644447-HAMD644512	04, 06-Waleed Hamed, 21
HAMD642997-HAMD643434	04, 08, 15
HAMD659858-HAMD659858	04, 21
HAMD607462-HAMD607463	05-Mufeed Hamed
HAMD607454-HAMD607455	05-Mufeed Hamed
HAMD607474-HAMD607495	05-Mufeed Hamed
HAMD563339-HAMD563340	05-Mufeed Hamed
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HAMD607468-HAMD607469	05-Mufeed Hamed
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HAMD607496-HAMD607526	05-Mufeed Hamed
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HAMD277399-HAMD277433	05-Mohammad Hamed, 07
HAMD593785-HAMD593786	05-Mohammad Hamed, 07
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HAMD609081-HAMD609095	05-Mohammad Hamed,Mufeed Hamed,Hisham Hamed, 07
HAMD607879-HAMD607879	05-Hisham Hamed
HAMD608117-HAMD608117	05-Hisham Hamed
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HAMD609059-HAMD609077	05-Hisham Hamed
HAMD608904-HAMD608904	05-Hisham Hamed
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HAMD608748-HAMD608759	05-Hisham Hamed
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HAMD609116-HAMD609146	05-Hisham Hamed
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HAMD609147-HAMD609181	05-Hisham Hamed, 07
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HAMD594284-HAMD594288	05-Mufeed Hamed
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HAMD592402-HAMD592431	05-Mohammad Hamed
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YUSF237817-YUSF237882	23

**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

Consolidated with

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

vs.

FATHI YUSUF, *Defendant.*

Case No.: SX-2014-CV-278

Consolidated with

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*

Defendants.

Case No.: ST-17-CV-384

**PLAINTIFF/COUNTERCLAIM DEFENDANT WALEED HAMED'S
RESPONSES TO FATHI YUSUF'S REQUESTS TO PRODUCE 21-24 TO HAMED**

Objection to all of the following:

This discovery is limited to the Revised Claims set forth by the parties pursuant to the direction of the Special Master. All discovery must, therefore, relate to or be calculated to lead to discoverable evidence as to one of the Claims set forth. Yusuf does not identify the claims to which inquiries relate -- and most do not relate to any of the remaining Revised Claims. (In Hamed's discovery each item is related to the specific claim.) No documents have been withheld based on this objection.

RFPD 21. Please produce every document identified in your response to Rog 34.

Response: Hamed objects to producing spreadsheets, proposals and mediation assessments or statements in the Criminal Case prepared by Hamed's attorneys as they are protected by the attorney work product. Subject to that objection, Hamed identifies the following documents as responsive to the request--
none were withheld:

- Exhibit 49 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf. This was prepared by Attorney Carl Hartmann with paralegal assistance.
- Overage 1996-2001 to Fathi Yusuf - US Gov Calculation prepared on September 28, 2014 by Attorney Carl Hartmann with paralegal assistance. (See, HAMD659858-HAMD659858.pdf)

Also, please see the following:

- Draft Summary Schedules, letter transmitting document dated December 28, 2004. prepared by the FBI and US Department of Justice. Hamed does not know the specific attorney or accountant who prepared the document. (See, HAMD629722-HAMD630014.pdf)

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 22. Please produce all invoices for any attorney's fees incurred by any Hamed family member in the Criminal Case including their time entries and descriptions of services performed.

Response: Hamed objects to this request as written, as no attorneys' fees were incurred individually by any Hamed family member in the criminal case (*United States of America vs. United Corp. et. al.*, in the District Court of the Virgin Islands (St. Thomas Division), Docket No. 1:05-cr-00015) prior to the termination of the Joint Defendant Agreement in September of 2012. Invoices dated after the expiration of the joint defense agreement on September 19, 2012 were not paid for with Partnership funds. During the life of the joint defense agreement, these expenses were not split or attributed to any individual defendant, "rather all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case," according to the affidavit of Gordon C. Rhea, one of the attorneys party to the joint defense agreement:

I, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

1. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:

FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed
WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION

4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.

6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.
7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.
8. Under the Joint Defense Agreement;
 - a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.
 - b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.
 - c. Simply because a bill was 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 place.
 - d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.
 - e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account.

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf)

Further evidence of this is shown in letters Randall Andreozzi, Esq., wrote on behalf of the United Corporation in 2012-2009 to the federal government, requesting Partnership funds be released on United's behalf. An attorney solely representing Waleed Hamed would not be making requests to the federal government in a criminal case on behalf of the United Corporation and its shareholders. Yusuf's argument that Attorney Andreozzi solely represented Waleed Hamed during the time of the joint defense agreement is absurd. See, e.g., HAMD562177-HAMD562179.pdf, HAMD562183-HAMD562185.pdf, HAMD261888-HAMD261892.pdf, HAMD562180-HAMD562182.pdf,

HAMD562174-HAMD562176.pdf, HAMD562159-HAMD562166.pdf and HAMD562157-HAMD562158.pdf. Similarly, it was Andreozzi who appeared before Judge Lewis on behalf of all defendants. No documents were withheld based on this objection.

Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 23. To the extent not previously produced, please produce all documents identified in your responses to all of the Interrogatories served on you in this case.

Response: Please see **Attachment A** for a listing of documents responsive to this request.

RFPD 24. Please produce all documents upon which you intend to rely either in the defense of the Yusuf Claims as set forth in Exhibit 6 or in support of the Hamed Claims.

Response: Hamed objects to this request as overly broad. Subject to that objection, he states that he has not determined which documents will be used in defense of the Yusuf claims or in support of the Hamed claims. He will supplement this response when that decision is ultimately made.

Dated: May 15, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2018, I served a copy of the foregoing by email (via CaseAnywhere) without the attached documents which were sent by USB Drive by Federal Express, as agreed by the parties, **without the attached documents, which were made available by FTP Server that same day, as requested (DTF) or USPS Mail (Eckard & Moorhead)**, as shown, on:

Hon. Edgar Ross (without documents)
Special Master
edgarrossjudge@hotmail.com

Gregory H. Hodges (Documents by FTP Server)
Stefan Herpel
Charlotte Perrell
Law House, 10000 Frederiksberg Gade
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Jeffrey B. C. Moorhead (Documents by USB Drive by USPS Mail)
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CERTIFICATE OF WORD/PAGE COUNT

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



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HAMD610254-HAMD610258	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610306-HAMD610312	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610212-HAMD610215	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610686-HAMD610690	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610172-HAMD610178	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610116-HAMD610121	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610691-HAMD610695	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610477-HAMD610481	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610147-HAMD610151	01d-Hisham Hamed, 06-Hisham Hamed

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HAMD610595-HAMD610600	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610548-HAMD610553	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610774-HAMD610780	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610544-HAMD610547	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610233-HAMD610238	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610502-HAMD610506	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610482-HAMD610487	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610313-HAMD610317	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610327-HAMD610331	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610128-HAMD610135	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610365-HAMD610368	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610228-HAMD610232	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610498-HAMD610501	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610525-HAMD610530	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610354-HAMD610358	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610788-HAMD610794	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610122-HAMD610127	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610531-HAMD610536	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610223-HAMD610227	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610416-HAMD610420	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610704-HAMD610705	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610513-HAMD610518	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610249-HAMD610253	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610680-HAMD610685	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610488-HAMD610492	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610706-HAMD610711	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610559-HAMD610564	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610318-HAMD610322	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610537-HAMD610543	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD607562-HAMD607565	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
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BDO_004598-004608	01d-Mohammad Hamed
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BDO_004517-004518	01d-Mohammad Hamed
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BDO_004497-004498	01d-Mohammad Hamed
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BDO_002832-002833	01d-Hisham Hamed
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BDO_003588-003592	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003526-003532	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002790-002797	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD614929-HAMD614935	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610941-HAMD610946	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003291-003294	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614949-HAMD614955	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003401-003406	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD614905-HAMD614908	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003513-003518	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002956-002962	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003700-003704	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003254-003261	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003540-003545	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003583-003587	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610936-HAMD610940	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002942-002948	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003605-003609	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003233-003240	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003546-003550	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614956-HAMD614959	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002999-003005	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003614-003619	01d-Hisham Hamed, 06-Hisham Hamed
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YUSF153984-YUSF153984	01d-Waleed Hamed

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YUSF153746-YUSF153746	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153374-YUSF153374	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154415-YUSF154415	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153434-YUSF153434	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153148-YUSF153148	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153731-YUSF153731	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153816-YUSF153816	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153568-YUSF153568	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154202-YUSF154202	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153233-YUSF153233	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153232-YUSF153232	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153131-YUSF153131	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154167-YUSF154167	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153367-YUSF153367	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154435-YUSF154435	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153799-YUSF153799	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153528-YUSF153528	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154345-YUSF154345	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153649-YUSF153649	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154382-YUSF154382	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154343-YUSF154343	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153122-YUSF153122	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154325-YUSF154325	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153340-YUSF153340	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154362-YUSF154362	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153800-YUSF153800	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153126-YUSF1531	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154365-YUSF154365	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153553-YUSF153553	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153542-YUSF153542	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153310-YUSF153310	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153151-YUSF153151	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154126-YUSF154126	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF154256-YUSF154256	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153198-YUSF153198	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154234-YUSF154234	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153468-YUSF153470	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153350-YUSF153350	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154319-YUSF154319	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154398-YUSF154398	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153160-YUSF153160	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153139-YUSF153139	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153158-YUSF153158	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153112-YUSF153112	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154211-YUSF154211	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153227-YUSF153228	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154403-YUSF154403	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154421-YUSF154421	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104928-YUSF104939	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154131-YUSF154132	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153785-YUSF153785	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153699-YUSF153699	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154272-YUSF154272	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153623-YUSF153625	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154157-YUSF154157	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153632-YUSF153632	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153560-YUSF153560	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153129-YUSF153129	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154197-YUSF154197	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153539-YUSF153539	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154311-YUSF154311	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153527-YUSF153527	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153221-YUSF153222	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154316-YUSF154316	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153707-YUSF153707	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153717-YUSF153717	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153137-YUSF153137	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153108-YUSF153108	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153525-YUSF153525	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153274-YUSF153274	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153166-YUSF153166	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154347-YUSF154347	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154299-YUSF154299	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153828-YUSF153828	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153558-YUSF153558	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154410-YUSF154410	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154158-YUSF154160	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153735-YUSF153735	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153597-YUSF153600	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153238-YUSF153238	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153943-YUSF153943	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153252-YUSF153252	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153786-YUSF153786	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153703-YUSF153703	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154260-YUSF154260	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153645-YUSF153645	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153249-YUSF153249	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153760-YUSF153762	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153459-YUSF153461	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154187-YUSF154187	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153152-YUSF153152	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154306-YUSF154306	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154203-YUSF154203	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153207-YUSF153208	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153968-YUSF153968	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153594-YUSF153594	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154414-YUSF154414	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153759-YUSF153759	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154214-YUSF154214	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154186-YUSF154186	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153583-YUSF153586	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153431-YUSF153431	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153904-YUSF153904	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153195-YUSF153195	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153141-YUSF153141	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153243-YUSF153243	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153687-YUSF153687	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154381-YUSF154381	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153580-YUSF153580	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154219-YUSF154219	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153306-YUSF153307	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153186-YUSF153186	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153230-YUSF153230	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153275-YUSF153275	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154137-YUSF154137	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154429-YUSF154429	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153766-YUSF153766	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154239-YUSF154239	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153405-YUSF153405	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154330-YUSF154330	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153212-YUSF153212	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153664-YUSF153664	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154331-YUSF154331	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153729-YUSF153729	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153442-YUSF153442	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154200-YUSF154200	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154228-YUSF154228	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153631-YUSF153631	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153752-YUSF153752	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154433-YUSF154433	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153574-YUSF153577	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153765-YUSF153765	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154161-YUSF154161	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153435-YUSF153437	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154047-YUSF154049	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153220-YUSF153220	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154370-YUSF154370	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154199-YUSF154199	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153444-YUSF153444	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154250-YUSF154251	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153824-YUSF153824	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153364-YUSF153364	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153815-YUSF153815	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153929-YUSF153929	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153511-YUSF153511	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153376-YUSF153376	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153210-YUSF153210	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF154360-YUSF154360	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153835-YUSF153837	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154334-YUSF154334	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154205-YUSF154207	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153751-YUSF153751	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153592-YUSF153592	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153209-YUSF153209	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154237-YUSF154237	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154196-YUSF154196	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153634-YUSF153634	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153662-YUSF153662	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154373-YUSF154373	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153200-YUSF153202	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153349-YUSF153349	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153353-YUSF153353	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153415-YUSF153415	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154279-YUSF154279	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153595-YUSF153595	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154209-YUSF154209	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154424-YUSF154424	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153530-YUSF153530	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153544-YUSF153546	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153605-YUSF153605	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154174-YUSF154174	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153333-YUSF153333	01d-Waleed Hamed, 06-Waleed Hamed
YUSF105001-YUSF105012	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153738-YUSF153738	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153549-YUSF153549	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153187-YUSF153187	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154222-YUSF154222	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153780-YUSF153780	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154416-YUSF154416	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153288-YUSF153288	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154264-YUSF154265	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154274-YUSF154274	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153164-YUSF153164	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153516-YUSF153516	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153214-YUSF153214	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153185-YUSF153185	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153536-YUSF153536	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154280-YUSF154280	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154236-YUSF154236	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154395-YUSF154395	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154253-YUSF154253	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154380-YUSF154380	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153875-YUSF153875	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153299-YUSF153299	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154375-YUSF154375	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153696-YUSF153696	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153381-YUSF153381	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154337-YUSF154338	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153167-YUSF153167	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154289-YUSF154289	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153825-YUSF153825	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153778-YUSF153778	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104957-YUSF104968	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153291-YUSF153291	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154399-YUSF154399	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153255-YUSF153255	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153730-YUSF153730	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154249-YUSF154249	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153395-YUSF153395	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153263-YUSF153264	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153269-YUSF153269	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153259-YUSF153259	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153787-YUSF153787	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154168-YUSF154168	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153334-YUSF153334	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153616-YUSF153616	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153701-YUSF153701	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154278-YUSF154278	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153548-YUSF153548	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153581-YUSF153581	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154193-YUSF154193	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153388-YUSF153388	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154321-YUSF154321	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153343-YUSF153343	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154144-YUSF154144	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153155-YUSF153155	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153996-YUSF153996	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154254-YUSF154254	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153242-YUSF153242	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153331-YUSF153331	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153680-YUSF153680	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153103-YUSF153103	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154405-YUSF154405	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153732-YUSF153732	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153363-YUSF153363	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154178-YUSF154180	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153332-YUSF153332	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153371-YUSF153371	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154402-YUSF154402	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153512-YUSF153512	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154215-YUSF154217	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153537-YUSF153537	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153483-YUSF153483	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153550-YUSF153550	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154394-YUSF154394	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153798-YUSF153798	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154235-YUSF154235	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153428-YUSF153428	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154317-YUSF154317	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153722-YUSF153724	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153515-YUSF153515	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154201-YUSF154201	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153297-YUSF153297	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154162-YUSF154162	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153403-YUSF153403	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153639-YUSF153639	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104943-YUSF104954	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153737-YUSF153737	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154374-YUSF154374	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154434-YUSF154434	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153251-YUSF153251	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153954-YUSF153954	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153196-YUSF153196	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154346-YUSF154346	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153404-YUSF153404	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153796-YUSF153796	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153524-YUSF153524	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153769-YUSF153769	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153661-YUSF153661	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153177-YUSF153177	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153519-YUSF153521	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153172-YUSF153172	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154328-YUSF154329	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154074-YUSF154074	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153339-YUSF153339	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153502-YUSF153502	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153192-YUSF153192	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153168-YUSF153168	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154115-YUSF154115	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153390-YUSF153390	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153629-YUSF153629	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153777-YUSF153777	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154145-YUSF154145	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153321-YUSF153321	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153250-YUSF153250	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153601-YUSF153601	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153571-YUSF153571	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154102-YUSF154102	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154404-YUSF154404	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153130-YUSF153130	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104971-YUSF104982	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153142-YUSF153142	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153640-YUSF153640	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153359-YUSF153359	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153679-YUSF153679	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153473-YUSF153473	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154213-YUSF154213	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154188-YUSF154190	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153457-YUSF153457	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154208-YUSF154208	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154379-YUSF154379	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153633-YUSF153633	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153556-YUSF153556	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153123-YUSF153123	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153514-YUSF153514	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153596-YUSF153596	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153456-YUSF153456	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153369-YUSF153370	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153890-YUSF153890	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153273-YUSF153273	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154358-YUSF154358	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153432-YUSF153432	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154390-YUSF154390	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153337-YUSF153337	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154350-YUSF154351	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153338-YUSF153338	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153500-YUSF153500	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153864-YUSF153864	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153604-YUSF153604	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154385-YUSF154385	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153770-YUSF153770	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153454-YUSF153454	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153380-YUSF153380	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153235-YUSF153235	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153197-YUSF153197	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153262-YUSF153262	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154353-YUSF154353	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154170-YUSF154170	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154359-YUSF154359	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154262-YUSF154262	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153551-YUSF153551	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154204-YUSF154204	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153540-YUSF153540	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153312-YUSF153312	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154142-YUSF154142	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153204-YUSF153204	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153217-YUSF153217	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153504-YUSF153504	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153427-YUSF153427	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154301-YUSF154302	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153721-YUSF153721	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153622-YUSF153622	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153414-YUSF153414	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153642-YUSF153642	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153669-YUSF153669	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153389-YUSF153389	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153462-YUSF153462	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153535-YUSF153535	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154176-YUSF154176	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153445-YUSF153446	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153480-YUSF153480	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153418-YUSF153418	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153194-YUSF153194	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153320-YUSF153320	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153757-YUSF153757	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153331-YUSF153331	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153268-YUSF153268	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153518-YUSF153518	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154288-YUSF154288	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154151-YUSF154151	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153573-YUSF153573	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154430-YUSF154430	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153440-YUSF153440	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153702-YUSF153702	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153226-YUSF153226	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154393-YUSF154393	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153373-YUSF153373	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154308-YUSF154309	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153154-YUSF153154	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153438-YUSF153438	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154036-YUSF154036	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154182-YUSF154182	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153239-YUSF153240	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153352-YUSF153352	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153327-YUSF153327	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153429-YUSF153429	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154281-YUSF154281	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153764-YUSF153764	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153477-YUSF153479	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153384-YUSF153385	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153113-YUSF153115	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153628-YUSF153628	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154291-YUSF154293	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153110-YUSF153110	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153706-YUSF153706	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154294-YUSF154294	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153261-YUSF153261	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154175-YUSF154175	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154192-YUSF154192	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153101-YUSF153101	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154148-YUSF154150	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153659-YUSF153659	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154218-YUSF154218	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154307-YUSF154307	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153685-YUSF153685	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153660-YUSF153660	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153768-YUSF153768	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153818-YUSF153818	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153365-YUSF153365	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153330-YUSF153330	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153441-YUSF153441	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153606-YUSF153606	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153361-YUSF153361	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153503-YUSF153503	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153366-YUSF153366	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153651-YUSF153654	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154138-YUSF154138	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154333-YUSF154333	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154184-YUSF154184	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153783-YUSF153783	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153173-YUSF153175	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154283-YUSF154284	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154392-YUSF154392	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153671-YUSF153673	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154341-YUSF154341	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154275-YUSF154277	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154269-YUSF154270	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153270-YUSF153271	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153111-YUSF153111	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153609-YUSF153609	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153508-YUSF153510	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153292-YUSF153292	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153781-YUSF153781	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153755-YUSF153755	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153647-YUSF153647	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153211-YUSF153211	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154332-YUSF154332	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153492-YUSF153492	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153309-YUSF153309	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153543-YUSF153543	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153188-YUSF153188	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153741-YUSF153741	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153620-YUSF153620	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153107-YUSF153107	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153748-YUSF153748	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153657-YUSF153657	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153602-YUSF153602	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153458-YUSF153458	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153608-YUSF153608	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154147-YUSF154147	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154313-YUSF154313	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154088-YUSF154088	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153678-YUSF153678	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153505-YUSF153505	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154367-YUSF154367	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154371-YUSF154372	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154263-YUSF154263	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153779-YUSF153779	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154210-YUSF154210	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153224-YUSF153224	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154327-YUSF154327	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154324-YUSF154324	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153392-YUSF153392	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153567-YUSF153567	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154252-YUSF154252	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153531-YUSF153531	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153375-YUSF153375	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154127-YUSF154127	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154238-YUSF154238	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153700-YUSF153700	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153302-YUSF153302	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153557-YUSF153557	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153611-YUSF153611	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154310-YUSF154310	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153377-YUSF153378	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153742-YUSF153742	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153782-YUSF153782	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154261-YUSF154261	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153749-YUSF153749	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153809-YUSF153809	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153655-YUSF153655	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153750-YUSF153750	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153834-YUSF153834	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154436-YUSF154436	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153231-YUSF153231	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153215-YUSF153216	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153102-YUSF153102	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153579-YUSF153579	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153526-YUSF153526	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153471-YUSF153471	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154357-YUSF154357	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153408-YUSF153408	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153358-YUSF153358	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154432-YUSF154432	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153409-YUSF153411	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154063-YUSF154063	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153246-YUSF153248	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153756-YUSF153756	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153501-YUSF153501	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154164-YUSF154164	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153257-YUSF153258	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154212-YUSF154212	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153236-YUSF153236	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154352-YUSF154352	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153150-YUSF153150	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153283-YUSF153283	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154298-YUSF154298	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153814-YUSF153814	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153789-YUSF153791	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153133-YUSF153133	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153218-YUSF153218	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153324-YUSF153324	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153681-YUSF153681	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153179-YUSF153179	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153109-YUSF153109	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153134-YUSF153136	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154340-YUSF154340	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153650-YUSF153650	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154195-YUSF154195	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153813-YUSF153813	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153788-YUSF153788	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153298-YUSF153298	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153487-YUSF153487	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153394-YUSF153394	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153144-YUSF153146	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154303-YUSF154303	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153665-YUSF153665	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153391-YUSF153391	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154185-YUSF154185	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153589-YUSF153589	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153149-YUSF153149	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154342-YUSF154342	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154425-YUSF154425	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153325-YUSF153325	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153823-YUSF153823	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF154169-YUSF154169	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153668-YUSF153668	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153190-YUSF153191	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153488-YUSF153488	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153617-YUSF153617	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153547-YUSF153547	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153619-YUSF153619	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154423-YUSF154423	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153379-YUSF153379	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153169-YUSF153171	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153666-YUSF153666	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153795-YUSF153795	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154297-YUSF154297	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153698-YUSF153698	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154247-YUSF154247	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153189-YUSF153189	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153683-YUSF153683	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153301-YUSF153301	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153407-YUSF153407	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154318-YUSF154318	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154411-YUSF154411	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154155-YUSF154155	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153481-YUSF153481	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154273-YUSF154273	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153355-YUSF153356	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153362-YUSF153362	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154245-YUSF154245	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154181-YUSF154181	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153725-YUSF153725	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153734-YUSF153734	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154163-YUSF154163	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154221-YUSF154221	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153402-YUSF153402	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153117-YUSF153117	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104986-YUSF104997	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153116-YUSF153116	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154314-YUSF154315	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153397-YUSF153397	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153244-YUSF153244	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153159-YUSF153159	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153241-YUSF153241	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153704-YUSF153704	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153290-YUSF153290	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153708-YUSF153708	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153739-YUSF153739	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153344-YUSF153344	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154377-YUSF154377	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154322-YUSF154322	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154191-YUSF154191	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153523-YUSF153523	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154129-YUSF154129	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154335-YUSF154335	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153607-YUSF153607	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153472-YUSF153472	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153156-YUSF153156	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154438-YUSF154438	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153675-YUSF153675	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153644-YUSF153644	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154267-YUSF154267	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153641-YUSF153641	01d-Waleed Hamed, 06-Waleed Hamed
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HAMD625008-HAMD625097	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154242-YUSF154244	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154300-YUSF154300	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153889-YUSF153889	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF154128-YUSF154128	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154413-YUSF154413	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153484-YUSF153484	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154418-YUSF154418	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154143-YUSF154143	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154364-YUSF154364	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154323-YUSF154323	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153561-YUSF153561	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154225-YUSF154227	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153810-YUSF153812	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153476-YUSF153476	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153181-YUSF153181	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153448-YUSF153452	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153677-YUSF153677	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154246-YUSF154246	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153289-YUSF153289	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153670-YUSF153670	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153555-YUSF153555	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153532-YUSF153534	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153294-YUSF153294	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153727-YUSF153727	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153807-YUSF153807	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153591-YUSF153591	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153341-YUSF153341	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153386-YUSF153386	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154312-YUSF154312	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153165-YUSF153165	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154437-YUSF154437	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153688-YUSF153688	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154257-YUSF154258	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153773-YUSF153773	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153570-YUSF153570	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154153-YUSF154153	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153793-YUSF153793	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153538-YUSF153538	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154287-YUSF154287	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154442-YUSF154442	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153260-YUSF153260	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153314-YUSF153315	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153541-YUSF153541	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154255-YUSF154255	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153817-YUSF153817	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153281-YUSF153281	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154146-YUSF154146	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154384-YUSF154384	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153635-YUSF153637	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154439-YUSF154440	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153157-YUSF153157	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153316-YUSF153316	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154406-YUSF154406	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153566-YUSF153566	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154171-YUSF154173	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153125-YUSF153125	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153147-YUSF153147	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153663-YUSF153663	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153153-YUSF153153	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154282-YUSF154282	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153692-YUSF153694	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153295-YUSF153296	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153667-YUSF153667	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154391-YUSF154391	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153603-YUSF153603	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153234-YUSF153234	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153630-YUSF153630	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153465-YUSF153465	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153486-YUSF153486	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153776-YUSF153776	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154152-YUSF154152	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154198-YUSF154198	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153161-YUSF153163	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153119-YUSF153119	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154130-YUSF154130	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153265-YUSF153265	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153206-YUSF153206	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153430-YUSF153430	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154141-YUSF154141	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154232-YUSF154233	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154361-YUSF154361	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153827-YUSF153827	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154156-YUSF154156	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154426-YUSF154428	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154268-YUSF154268	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153193-YUSF153193	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154354-YUSF154356	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153205-YUSF153205	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153572-YUSF153572	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153304-YUSF153304	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153728-YUSF153728	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153656-YUSF153656	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153303-YUSF153303	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154229-YUSF154229	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153406-YUSF153406	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153420-YUSF153420	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153266-YUSF153266	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153850-YUSF153850	01d-Waleed Hamed, 06-Waleed Hamed
YUSF105410-YUSF105410	01d-Waleed Hamed, 11
YUSF240322-YUSF240328	01d-Waleed Hamed, Mufeed Hamed
YUSF153774-YUSF153774	01d-Waleed Hamed, Mufeed Hamed
YUSF153792-YUSF153792	01d-Waleed Hamed, Mufeed Hamed
YUSF153808-YUSF153808	01d-Waleed Hamed, Mufeed Hamed 06-Waleed Hamed, Mufeed Hamed
HAMD615299-HAMD615365	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615366-HAMD615369	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615101-HAMD615101	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615163-HAMD615234	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615056-HAMD615100	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615102-HAMD615162	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed

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Document Bates Range	RFPD Numbers
HAMD615235-HAMD615298	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD607592-HAMD607594	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615370-HAMD615426	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615470-HAMD615470	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615027-HAMD615055	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615427-HAMD615456	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
YUSF153676-YUSF153676	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153754-YUSF153754	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153522-YUSF153522	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153805-YUSF153805	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153733-YUSF153733	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_008006-008022	01d-Waheed Hamed, 06-Waheed Hamed
HAMD625098-HAMD625114	01d-Waheed Hamed, 06-Waheed Hamed
YUSF104586-YUSF104683	01, Waleed Hamed, 06-Waleed Hamed
HAMD209806-HAMD209809	01-Waleed Hamed, 06-Waleed Hamed
BDO_011270-011274	01-Waleed Hamed, 06-Waleed Hamed
BDO_012845-012845	01-Waleed Hamed, 06-Waleed Hamed
BDO_012801-012801	01-Waleed Hamed, 06-Waleed Hamed
BDO_010998-011007	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010023-010032	01-Waleed Hamed, 06-Waleed Hamed
BDO_011260-011264	01-Waleed Hamed, 06-Waleed Hamed
BDO_009604-009613	01-Waleed Hamed, 06-Waleed Hamed
HAMD618735-HAMD618926	01-Waleed Hamed, 06-Waleed Hamed
BDO_011088-011097	01-Waleed Hamed, 06-Waleed Hamed
BDO_014936-014936	01-Waleed Hamed, 06-Waleed Hamed
BDO_012929-012936	01-Waleed Hamed, 06-Waleed Hamed
BDO_015336-015336	01-Waleed Hamed, 06-Waleed Hamed
HAMD209762-HAMD209764	01-Waleed Hamed, 06-Waleed Hamed
BDO_010679-010692	01-Waleed Hamed, 06-Waleed Hamed
BDO_012858-012858	01-Waleed Hamed, 06-Waleed Hamed
BDO_012840-012840	01-Waleed Hamed, 06-Waleed Hamed
BDO_012825-012825	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
BDO_011409-011413	01-Waleed Hamed, 06-Waleed Hamed
BDO_012831-012831	01-Waleed Hamed, 06-Waleed Hamed
BDO_013469-013488	01-Waleed Hamed, 06-Waleed Hamed
BDO_011379-011383	01-Waleed Hamed, 06-Waleed Hamed
BDO_009268-009271	01-Waleed Hamed, 06-Waleed Hamed
BDO_014887-014887	01-Waleed Hamed, 06-Waleed Hamed
BDO_010847-010856	01-Waleed Hamed, 06-Waleed Hamed
BDO_014935-014935	01-Waleed Hamed, 06-Waleed Hamed
BDO_013057-013070	01-Waleed Hamed, 06-Waleed Hamed
BDO_015364-015364	01-Waleed Hamed, 06-Waleed Hamed
BDO_015333-015333	01-Waleed Hamed, 06-Waleed Hamed
BDO_009730-009737	01-Waleed Hamed, 06-Waleed Hamed
BDO_011399-011403	01-Waleed Hamed, 06-Waleed Hamed
BDO_012787-012787	01-Waleed Hamed, 06-Waleed Hamed
BDO_010603-010616	01-Waleed Hamed, 06-Waleed Hamed
HAMD623496-HAMD623615	01-Waleed Hamed, 06-Waleed Hamed
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BDO_013071-013081	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010525-010532	01-Waleed Hamed, 06-Waleed Hamed
BDO_015107-015108	01-Waleed Hamed, 06-Waleed Hamed
HAMD209797-HAMD209799	01-Waleed Hamed, 06-Waleed Hamed
HAMD624248-HAMD624321	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012795-012795	01-Waleed Hamed, 06-Waleed Hamed
BDO_012803-012803	01-Waleed Hamed, 06-Waleed Hamed
BDO_010151-010159	01-Waleed Hamed, 06-Waleed Hamed
BDO_011038-011047	01-Waleed Hamed, 06-Waleed Hamed
BDO_010318-010321	01-Waleed Hamed, 06-Waleed Hamed
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BDO_014937-014937	01-Waleed Hamed, 06-Waleed Hamed
BDO_015330-015330	01-Waleed Hamed, 06-Waleed Hamed
BDO_011255-011259	01-Waleed Hamed, 06-Waleed Hamed
HAMD621847-HAMD622378	01-Waleed Hamed, 06-Waleed Hamed
BDO_010239-010243	01-Waleed Hamed, 06-Waleed Hamed
BDO_014890-014890	01-Waleed Hamed, 06-Waleed Hamed
BDO_013338-013349	01-Waleed Hamed, 06-Waleed Hamed
BDO_012799-012799	01-Waleed Hamed, 06-Waleed Hamed
HAMD616835-HAMD616966	01-Waleed Hamed, 06-Waleed Hamed
HAMD617775-HAMD618006	01-Waleed Hamed, 06-Waleed Hamed

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BDO_010260-010264	01-Waleed Hamed, 06-Waleed Hamed
BDO_014897-014897	01-Waleed Hamed, 06-Waleed Hamed
BDO_011364-011368	01-Waleed Hamed, 06-Waleed Hamed
HAMD440562-HAMD440569	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009457-009466	01-Waleed Hamed, 06-Waleed Hamed
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BDO_013197-013204	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015402-015402	01-Waleed Hamed, 06-Waleed Hamed
BDO_012796-012796	01-Waleed Hamed, 06-Waleed Hamed
BDO_010362-010369	01-Waleed Hamed, 06-Waleed Hamed
BDO_010541-010548	01-Waleed Hamed, 06-Waleed Hamed
BDO_014997-014997	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012848-012848	01-Waleed Hamed, 06-Waleed Hamed
BDO_012937-012944	01-Waleed Hamed, 06-Waleed Hamed
BDO_012850-012850	01-Waleed Hamed, 06-Waleed Hamed
BDO_010898-010907	01-Waleed Hamed, 06-Waleed Hamed
HAMD623858-HAMD623903	01-Waleed Hamed, 06-Waleed Hamed
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BDO_014884-014884	01-Waleed Hamed, 06-Waleed Hamed
BDO_009917-009928	01-Waleed Hamed, 06-Waleed Hamed
BDO_010484-010491	01-Waleed Hamed, 06-Waleed Hamed

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BDO_015165-015166	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010077-010086	01-Waleed Hamed, 06-Waleed Hamed
BDO_012794-012794	01-Waleed Hamed, 06-Waleed Hamed
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HAMD617159-HAMD617390	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010723-010736	01-Waleed Hamed, 06-Waleed Hamed
BDO_014894-014894	01-Waleed Hamed, 06-Waleed Hamed
BDO_010747-010756	01-Waleed Hamed, 06-Waleed Hamed
BDO_011217-011221-BDO2016-10	01-Waleed Hamed, 06-Waleed Hamed
BDO_009689-009696	01-Waleed Hamed, 06-Waleed Hamed
BDO_011429-011433	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009806-009820	01-Waleed Hamed, 06-Waleed Hamed
BDO_011275-011278	01-Waleed Hamed, 06-Waleed Hamed
BDO_010255-010259	01-Waleed Hamed, 06-Waleed Hamed
BDO_012793-012793	01-Waleed Hamed, 06-Waleed Hamed
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HAMD209774-HAMD209776	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009778-009795	01-Waleed Hamed, 06-Waleed Hamed
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BDO_013178-013182	01-Waleed Hamed, 06-Waleed Hamed
BDO_015326-015326	01-Waleed Hamed, 06-Waleed Hamed
BDO_013035-013056	01-Waleed Hamed, 06-Waleed Hamed
BDO_009959-009970	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
BDO_010978-010987	01-Waleed Hamed, 06-Waleed Hamed
BDO_009292-009295	01-Waleed Hamed, 06-Waleed Hamed
BDO_012870-012870	01-Waleed Hamed, 06-Waleed Hamed
BDO_012844-012844	01-Waleed Hamed, 06-Waleed Hamed
BDO_009566-009575	01-Waleed Hamed, 06-Waleed Hamed
BDO_010250-010254	01-Waleed Hamed, 06-Waleed Hamed
BDO_011200-011205	01-Waleed Hamed, 06-Waleed Hamed
BDO_012867-012867	01-Waleed Hamed, 06-Waleed Hamed
HAMD619215-HAMD619442	01-Waleed Hamed, 06-Waleed Hamed
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HAMD618927-HAMD619214	01-Waleed Hamed, 06-Waleed Hamed
BDO_010221-010228	01-Waleed Hamed, 06-Waleed Hamed
BDO_009479-009488	01-Waleed Hamed, 06-Waleed Hamed
HAMD618275-HAMD618542	01-Waleed Hamed, 06-Waleed Hamed
BDO_012997-013010	01-Waleed Hamed, 06-Waleed Hamed
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HAMD619911-HAMD620142	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015547-015547	01-Waleed Hamed, 06-Waleed Hamed
BDO_011227-011233	01-Waleed Hamed, 06-Waleed Hamed
BDO_010565-010572	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
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BDO_012782-012782	01-Waleed Hamed, 06-Waleed Hamed
BDO_011303-011306	01-Waleed Hamed, 06-Waleed Hamed
BDO_015379-015379	01-Waleed Hamed, 06-Waleed Hamed
BDO_011346-011350	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010988-010997	01-Waleed Hamed, 06-Waleed Hamed
BDO_011338-011341-BDO2016	01-Waleed Hamed, 06-Waleed Hamed
HAMD617391-HAMD617582	01-Waleed Hamed, 06-Waleed Hamed
BDO_010310-010313	01-Waleed Hamed, 06-Waleed Hamed
HAMD623904-HAMD624077	01-Waleed Hamed, 06-Waleed Hamed
BDO_009181-009194	01-Waleed Hamed, 06-Waleed Hamed
HAMD616599-HAMD616702	01-Waleed Hamed, 06-Waleed Hamed
BDO_010286-010289	01-Waleed Hamed, 06-Waleed Hamed
BDO_010265-010269	01-Waleed Hamed, 06-Waleed Hamed
BDO_015403-015403	01-Waleed Hamed, 06-Waleed Hamed
BDO_010627-010640	01-Waleed Hamed, 06-Waleed Hamed
BDO_011118-011123	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010428-010435	01-Waleed Hamed, 06-Waleed Hamed
BDO_015446-015446	01-Waleed Hamed, 06-Waleed Hamed
BDO_012853-012853	01-Waleed Hamed, 06-Waleed Hamed
BDO_010412-010419	01-Waleed Hamed, 06-Waleed Hamed

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BDO_014938-014938	01-Waleed Hamed, 06-Waleed Hamed
BDO_015564-015564	01-Waleed Hamed, 06-Waleed Hamed
BDO_010693-010702	01-Waleed Hamed, 06-Waleed Hamed
BDO_010065-010076	01-Waleed Hamed, 06-Waleed Hamed
HAMD209786-HAMD209788	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009546-009555	01-Waleed Hamed, 06-Waleed Hamed
BDO_010370-010377	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015111-015112	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010817-010826	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010404-010411	01-Waleed Hamed, 06-Waleed Hamed
BDO_013264-013273	01-Waleed Hamed, 06-Waleed Hamed
HAMD616596-HAMD616598	01-Waleed Hamed, 06-Waleed Hamed
BDO_010777-010786	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
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BDO_011018-011027	01-Waleed Hamed, 06-Waleed Hamed
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HAMD622379-HAMD622718	01-Waleed Hamed, 06-Waleed Hamed
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BDO_014861-014861	01-Waleed Hamed, 06-Waleed Hamed
BDO_010918-010927	01-Waleed Hamed, 06-Waleed Hamed
BDO_014998-014998	01-Waleed Hamed, 06-Waleed Hamed

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BDO_012778-012778	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009594-009603	01-Waleed Hamed, 06-Waleed Hamed

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BDO_015195-015196	01-Waleed Hamed, 06-Waleed Hamed
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BDO_011471-011476	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009228-009233	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010302-010305	01-Waleed Hamed, 06-Waleed Hamed

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BDO_012864-012864	01-Waleed Hamed, 06-Waleed Hamed

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HAMD209832-HAMD209835	01-Waleed Hamed, 06-Waleed Hamed
BDO_009280-009283	01-Waleed Hamed, 06-Waleed Hamed
BDO_012777-012777	01-Waleed Hamed, 06-Waleed Hamed
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BDO_011008-011017	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015565-015565	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
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HAMD618007-HAMD618274	01-Waleed Hamed, 06-Waleed Hamed
BDO_010476-010483	01-Waleed Hamed, 06-Waleed Hamed
HAMD621083-HAMD621322	01-Waleed Hamed, 06-Waleed Hamed
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BDO_009714-009721	01-Waleed Hamed, 06-Waleed Hamed
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HAMD621323-HAMD621846	01-Waleed Hamed, 06-Waleed Hamed
BDO_010517-010524	01-Waleed Hamed, 06-Waleed Hamed
HAMD616479-HAMD616481	01-Waleed Hamed, 06-Waleed Hamed
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BDO_006085-006087	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005835-005840	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005990-005994	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006000-006006	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_005902-005906	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005627-005629	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_006044-006049	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005864-005868	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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HAMD405240-HAMD405243	01-Waheed Hamed, 06-Waheed Hamed
HAMD306173-HAMD306173	01-Waheed Hamed, 06-Waheed Hamed
HAMD305332-HAMD305335	01-Waheed Hamed, 06-Waheed Hamed
BDO_007679-007684	01-Waheed Hamed, 06-Waheed Hamed
BDO_007362-007366	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007336-007341	01-Waheed Hamed, 06-Waheed Hamed
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HAMD305366-HAMD305369	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007651-007652	01-Waheed Hamed, 06-Waheed Hamed
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HAMD305313-HAMD305316	01-Waheed Hamed, 06-Waheed Hamed
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HAMD405214-HAMD405217	01-Waheed Hamed, 06-Waheed Hamed
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HAMD305347-HAMD305350	01-Waheed Hamed, 06-Waheed Hamed
BDO_007607-007611	01-Waheed Hamed, 06-Waheed Hamed
BDO_007539-007543	01-Waheed Hamed, 06-Waheed Hamed
BDO_007703-007705	01-Waheed Hamed, 06-Waheed Hamed
HAMD305351-HAMD305354	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007473-007473	01-Waheed Hamed, 06-Waheed Hamed
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HAMD592384-HAMD592395	05-Waleed Hamed
HAMD443090-HAMD443090	05-Waleed Hamed

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HAMD225824-HAMD225827	05-Waleed Hamed, 07
HAMD430249-HAMD430252	05-Waleed Hamed, 07
HAMD214657-HAMD214658	05-Waleed Hamed, 07
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HAMD225867-HAMD225870	05-Waleed Hamed, 07
HAMD277469-HAMD277503	05-Waleed Hamed, 07
HAMD227522-HAMD227524	05-Waleed Hamed, 07
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HAMD214571-HAMD214572	05-Waheed Hamed
HAMD405193-HAMD405199	05-Waheed Hamed
YUSF107230-YUSF107233	05-Waheed Hamed
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FBIX257179-FBIX257187	05-Waheed Hamed
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HAMD255638-HAMD255642	05-Waheed Hamed
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HAMD214651-HAMD214652	05-Waheed Hamed, 07
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HAMD592944-HAMD592944	06-Waleed Hamed, Mufeed Hamed
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YUSF106292-YUSF106292	06-Waleed Hamed, 11
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BDO_004719-004723	01d-Mohammad Hamed
BDO_004473-004474	01d-Mohammad Hamed
YUSF153860-YUSF153860	01d-Mohammad Hamed, Waleed Hamed
YUSF153821-YUSF153821	01d-Mohammad Hamed, Waleed Hamed, 06-Mohammad Hamed, Waleed Hamed
BDO_002832-002833	01d-Hisham Hamed
HAMD614909-HAMD614913	01d-Hisham Hamed
HAMD614914-HAMD614922	01d-Hisham Hamed

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BDO_003654-003658	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003472-003476	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003295-003300	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003222-003225	01d-Hisham Hamed, 06-Hisham Hamed
BDO_006819-006820	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003588-003592	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003526-003532	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002892-002899	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003456-003460	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002851-002857	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002748-002755	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614929-HAMD614935	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610941-HAMD610946	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003371-003375	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003291-003294	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614949-HAMD614955	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003401-003406	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610918-HAMD610923	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614905-HAMD614908	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003285-003290	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003513-003518	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002956-002962	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003700-003704	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003254-003261	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610887-HAMD610891	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003669-003674	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003006-003015	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003540-003545	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610892-HAMD610896	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003583-003587	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610936-HAMD610940	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003307-003311	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003320-003326	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003268-003273	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614936-HAMD614942	01d-Hisham Hamed, 06-Hisham Hamed
BDO_008370-008370	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002900-002904	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002718-002718	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610853-HAMD610856	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003434-003438	01d-Hisham Hamed, 06-Hisham Hamed

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BDO_002845-002850	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002942-002948	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610869-HAMD610875	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003713-003716	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003605-003609	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003407-003411	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003233-003240	01d-Hisham Hamed, 06-Hisham Hamed
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HAMD610912-HAMD610917	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003381-003384	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003557-003560	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003248-003253	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003709-003712	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003312-003315	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002730-002739	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003412-003420	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002916-002923	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002992-002998	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002839-002839	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610929-HAMD610935	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003659-003663	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003566-003572	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002720-002729	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003274-003278	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003376-003380	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003546-003550	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614956-HAMD614959	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003691-003695	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002879-002884	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002911-002915	01d-Hisham Hamed, 06-Hisham Hamed

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BDO_003498-003505	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003397-003400	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003644-003648	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610953-HAMD610958	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003331-003336	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614943-HAMD614948	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002999-003005	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003341-003347	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002970-002976	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002885-002891	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003620-003625	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003262-003267	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002949-002955	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003461-003465	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610724-HAMD610728	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003614-003619	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003327-003330	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002798-002809	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003430-003433	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003664-003668	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003632-003638	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_002840-002844	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002756-002763	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610718-HAMD610723	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003551-003556	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002984-002991	01d-Hisham Hamed, 06-Hisham Hamed

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BDO_003681-003685	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003705-003706	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610841-HAMD610844	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003707-003708	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002764-002771	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003392-003396	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610907-HAMD610911	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003519-003525	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003359-003365	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610897-HAMD610901	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003482-003486	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003492-003497	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002936-002941	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002963-002969	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003337-003340	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003610-003613	01d-Hisham Hamed, 06-Hisham Hamed
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BDO_003686-003690	01d-Hisham Hamed, 06-Hisham Hamed
HAMD614960-HAMD614966	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002905-002910	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003348-003352	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002772-002781	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002873-002878	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003561-003565	01d-Hisham Hamed, 06-Hisham Hamed
BDO_002719-002719	01d-Hisham Hamed, 06-Hisham Hamed
BDO_003466-003471	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610902-HAMD610906	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610857-HAMD610861	01d-Hisham Hamed, 06-Hisham Hamed
HAMD610838-HAMD610840	01d-Hisham Hamed, 06-Hisham Hamed, 06-Hisham Hamed
YUSF153767-YUSF153767	01d-Hisham Hamed, Waleed Hamed, 06-Waleed Hamed, Hisham Hamed
YUSF153771-YUSF153771	01d-Hisham Hamed, Waleed Hamed, 06-Waleed Hamed, Hisham Hamed
YUSF153804-YUSF153804	01d-Hisham Hamed, Waleed Hamed, 06-Waleed Hamed, Hisham Hamed
YUSF154029-YUSF154029	01d-Waleed Hamed
YUSF153910-YUSF153910	01d-Waleed Hamed
YUSF153984-YUSF153984	01d-Waleed Hamed

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YUSF153900-YUSF153900	01d-Waleed Hamed
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YUSF153995-YUSF153995	01d-Waleed Hamed
YUSF153843-YUSF153843	01d-Waleed Hamed
YUSF154026-YUSF154026	01d-Waleed Hamed
YUSF153925-YUSF153925	01d-Waleed Hamed
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YUSF154122-YUSF154122	01d-Waleed Hamed

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YUSF153947-YUSF153947	01d-Waleed Hamed
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YUSF154017-YUSF154017	01d-Waleed Hamed
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YUSF154040-YUSF154040	01d-Waleed Hamed
YUSF154001-YUSF154001	01d-Waleed Hamed
YUSF154076-YUSF154076	01d-Waleed Hamed
YUSF154117-YUSF154117	01d-Waleed Hamed
YUSF153964-YUSF153964	01d-Waleed Hamed
YUSF154004-YUSF154004	01d-Waleed Hamed
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YUSF154002-YUSF154002	01d-Waleed Hamed
YUSF153957-YUSF153960	01d-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153952-YUSF153952	01d-Waleed Hamed
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YUSF154397-YUSF154397	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153716-YUSF153716	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104911-YUSF104922	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153151-YUSF153151	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154126-YUSF154126	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153306-YUSF153307	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153210-YUSF153210	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF154360-YUSF154360	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154274-YUSF154274	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153536-YUSF153536	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153155-YUSF153155	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF153556-YUSF153556	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153123-YUSF153123	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153513-YUSF153513	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153514-YUSF153514	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153596-YUSF153596	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153456-YUSF153456	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153369-YUSF153370	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153890-YUSF153890	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153273-YUSF153273	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154358-YUSF154358	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153432-YUSF153432	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154390-YUSF154390	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153337-YUSF153337	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154350-YUSF154351	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153338-YUSF153338	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153500-YUSF153500	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153864-YUSF153864	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153604-YUSF153604	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154385-YUSF154385	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153770-YUSF153770	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153454-YUSF153454	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153380-YUSF153380	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153235-YUSF153235	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153197-YUSF153197	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153262-YUSF153262	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154353-YUSF154353	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154170-YUSF154170	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154359-YUSF154359	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154262-YUSF154262	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154204-YUSF154204	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153540-YUSF153540	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153312-YUSF153312	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154142-YUSF154142	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153204-YUSF153204	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153217-YUSF153217	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153504-YUSF153504	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153427-YUSF153427	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154301-YUSF154302	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153721-YUSF153721	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153622-YUSF153622	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153414-YUSF153414	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153642-YUSF153642	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153669-YUSF153669	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153389-YUSF153389	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153562-YUSF153562	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153535-YUSF153535	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154176-YUSF154176	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153445-YUSF153446	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153480-YUSF153480	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153418-YUSF153418	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153194-YUSF153194	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153320-YUSF153320	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153757-YUSF153757	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153331-YUSF153331	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153268-YUSF153268	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153518-YUSF153518	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154288-YUSF154288	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154151-YUSF154151	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153573-YUSF153573	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153440-YUSF153440	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153702-YUSF153702	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153226-YUSF153226	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154154-YUSF154154	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153305-YUSF153305	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154393-YUSF154393	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154441-YUSF154441	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153282-YUSF153282	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154407-YUSF154409	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153373-YUSF153373	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154308-YUSF154309	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153203-YUSF153203	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153743-YUSF153745	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154296-YUSF154296	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153475-YUSF153475	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154326-YUSF154326	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153154-YUSF153154	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153438-YUSF153438	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154285-YUSF154285	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154240-YUSF154240	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154036-YUSF154036	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154182-YUSF154182	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153239-YUSF153240	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153352-YUSF153352	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153327-YUSF153327	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153429-YUSF153429	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154281-YUSF154281	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153764-YUSF153764	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153477-YUSF153479	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153384-YUSF153385	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153113-YUSF153115	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153628-YUSF153628	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154291-YUSF154293	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153110-YUSF153110	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153706-YUSF153706	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154192-YUSF154192	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153382-YUSF153382	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153659-YUSF153659	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154218-YUSF154218	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154307-YUSF154307	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153685-YUSF153685	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153660-YUSF153660	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153768-YUSF153768	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153818-YUSF153818	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154184-YUSF154184	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153173-YUSF153175	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154283-YUSF154284	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154392-YUSF154392	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153671-YUSF153673	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154341-YUSF154341	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154275-YUSF154277	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154269-YUSF154270	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153270-YUSF153271	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153111-YUSF153111	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153508-YUSF153510	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153292-YUSF153292	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153781-YUSF153781	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153755-YUSF153755	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153647-YUSF153647	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153211-YUSF153211	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154332-YUSF154332	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153492-YUSF153492	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153309-YUSF153309	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153543-YUSF153543	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153188-YUSF153188	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153741-YUSF153741	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153107-YUSF153107	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153748-YUSF153748	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153657-YUSF153657	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153602-YUSF153602	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153458-YUSF153458	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153608-YUSF153608	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154147-YUSF154147	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154313-YUSF154313	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154088-YUSF154088	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153678-YUSF153678	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153505-YUSF153505	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154367-YUSF154367	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154371-YUSF154372	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154263-YUSF154263	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153779-YUSF153779	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154238-YUSF154238	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153700-YUSF153700	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153302-YUSF153302	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153557-YUSF153557	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153377-YUSF153378	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153742-YUSF153742	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153782-YUSF153782	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154261-YUSF154261	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153749-YUSF153749	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153809-YUSF153809	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF154432-YUSF154432	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153409-YUSF153411	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154063-YUSF154063	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF154164-YUSF154164	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153257-YUSF153258	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154212-YUSF154212	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153236-YUSF153236	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153582-YUSF153582	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153326-YUSF153326	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153681-YUSF153681	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153179-YUSF153179	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153109-YUSF153109	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153134-YUSF153136	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154340-YUSF154340	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153650-YUSF153650	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154195-YUSF154195	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153813-YUSF153813	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153788-YUSF153788	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153298-YUSF153298	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153487-YUSF153487	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153394-YUSF153394	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153144-YUSF153146	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154303-YUSF154303	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153665-YUSF153665	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153391-YUSF153391	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154185-YUSF154185	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153589-YUSF153589	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153149-YUSF153149	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154342-YUSF154342	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154425-YUSF154425	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153325-YUSF153325	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153823-YUSF153823	01d-Waleed Hamed, 06-Waleed Hamed

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YUSF154169-YUSF154169	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153668-YUSF153668	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153190-YUSF153191	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153488-YUSF153488	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153617-YUSF153617	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153547-YUSF153547	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153619-YUSF153619	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154423-YUSF154423	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153379-YUSF153379	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153169-YUSF153171	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153666-YUSF153666	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153795-YUSF153795	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154297-YUSF154297	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153698-YUSF153698	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154247-YUSF154247	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153189-YUSF153189	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153683-YUSF153683	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153301-YUSF153301	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153407-YUSF153407	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154318-YUSF154318	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154411-YUSF154411	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154155-YUSF154155	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153481-YUSF153481	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154273-YUSF154273	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153355-YUSF153356	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153362-YUSF153362	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154245-YUSF154245	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153425-YUSF153425	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154181-YUSF154181	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153725-YUSF153725	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153734-YUSF153734	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154163-YUSF154163	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154221-YUSF154221	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153402-YUSF153402	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153117-YUSF153117	01d-Waleed Hamed, 06-Waleed Hamed
YUSF104986-YUSF104997	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153116-YUSF153116	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154314-YUSF154315	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153397-YUSF153397	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153244-YUSF153244	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153159-YUSF153159	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153241-YUSF153241	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153704-YUSF153704	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153290-YUSF153290	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153708-YUSF153708	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153739-YUSF153739	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153344-YUSF153344	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154377-YUSF154377	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154322-YUSF154322	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154191-YUSF154191	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153523-YUSF153523	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154129-YUSF154129	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154335-YUSF154335	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153607-YUSF153607	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153472-YUSF153472	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153156-YUSF153156	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154438-YUSF154438	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153675-YUSF153675	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153644-YUSF153644	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154267-YUSF154267	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153641-YUSF153641	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153626-YUSF153626	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154133-YUSF154133	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154177-YUSF154177	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154139-YUSF154139	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153569-YUSF153569	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154376-YUSF154376	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154007-YUSF154007	01d-Waleed Hamed, 06-Waleed Hamed
HAMD625008-HAMD625097	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154348-YUSF154349	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153638-YUSF153638	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153443-YUSF153443	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153490-YUSF153490	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153293-YUSF153293	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153715-YUSF153715	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153839-YUSF153841	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153710-YUSF153712	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153267-YUSF153267	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153118-YUSF153118	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154242-YUSF154244	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154300-YUSF154300	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153889-YUSF153889	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF154128-YUSF154128	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153590-YUSF153590	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153287-YUSF153287	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154413-YUSF154413	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153484-YUSF153484	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154418-YUSF154418	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154143-YUSF154143	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154364-YUSF154364	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154323-YUSF154323	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153561-YUSF153561	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154225-YUSF154227	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153810-YUSF153812	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153476-YUSF153476	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153181-YUSF153181	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153448-YUSF153452	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153677-YUSF153677	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154246-YUSF154246	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153289-YUSF153289	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153670-YUSF153670	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153555-YUSF153555	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153532-YUSF153534	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153294-YUSF153294	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153199-YUSF153199	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153727-YUSF153727	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153807-YUSF153807	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153591-YUSF153591	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153341-YUSF153341	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153386-YUSF153386	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154312-YUSF154312	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153165-YUSF153165	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154437-YUSF154437	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153802-YUSF153802	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153688-YUSF153688	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154257-YUSF154258	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153464-YUSF153464	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153773-YUSF153773	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153570-YUSF153570	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154153-YUSF154153	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153793-YUSF153793	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153538-YUSF153538	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154287-YUSF154287	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154442-YUSF154442	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153260-YUSF153260	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153314-YUSF153315	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153541-YUSF153541	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154255-YUSF154255	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153817-YUSF153817	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153281-YUSF153281	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154146-YUSF154146	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154384-YUSF154384	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153635-YUSF153637	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154439-YUSF154440	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153157-YUSF153157	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153316-YUSF153316	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154406-YUSF154406	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153566-YUSF153566	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154171-YUSF154173	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153125-YUSF153125	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153147-YUSF153147	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153663-YUSF153663	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153153-YUSF153153	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154282-YUSF154282	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153276-YUSF153276	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153360-YUSF153360	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153692-YUSF153694	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154140-YUSF154140	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153498-YUSF153498	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153426-YUSF153426	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154241-YUSF154241	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153295-YUSF153296	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153667-YUSF153667	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154391-YUSF154391	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153630-YUSF153630	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153465-YUSF153465	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154363-YUSF154363	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153486-YUSF153486	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153776-YUSF153776	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154152-YUSF154152	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154198-YUSF154198	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153161-YUSF153163	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153119-YUSF153119	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154130-YUSF154130	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153265-YUSF153265	01d-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
YUSF153206-YUSF153206	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153430-YUSF153430	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154141-YUSF154141	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154232-YUSF154233	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154361-YUSF154361	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153827-YUSF153827	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154156-YUSF154156	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154426-YUSF154428	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154268-YUSF154268	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153193-YUSF153193	01d-Waleed Hamed, 06-Waleed Hamed
YUSF154354-YUSF154356	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153205-YUSF153205	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153572-YUSF153572	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153728-YUSF153728	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153303-YUSF153303	01d-Waleed Hamed, 06-Waleed Hamed
YUSF153412-YUSF153412	01d-Waleed Hamed, 06-Waleed Hamed
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YUSF153850-YUSF153850	01d-Waleed Hamed, 06-Waleed Hamed
YUSF105410-YUSF105410	01d-Waleed Hamed, 11
YUSF240322-YUSF240328	01d-Waleed Hamed, Mufeed Hamed
YUSF153774-YUSF153774	01d-Waleed Hamed, Mufeed Hamed
YUSF153792-YUSF153792	01d-Waleed Hamed, Mufeed Hamed
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HAMD615101-HAMD615101	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615163-HAMD615234	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615056-HAMD615100	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615102-HAMD615162	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed

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Document Bates Range	RFPD Numbers
HAMD615235-HAMD615298	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
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HAMD615370-HAMD615426	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615470-HAMD615470	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615027-HAMD615055	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
HAMD615427-HAMD615456	01d-Waleed Hamed, Mufeed Hamed, 06 Waleed Hamed, Mufeed Hamed
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YUSF153805-YUSF153805	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
YUSF153733-YUSF153733	01d-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_008006-008022	01d-Waheed Hamed, 06-Waheed Hamed
HAMD625098-HAMD625114	01d-Waheed Hamed, 06-Waheed Hamed
YUSF104586-YUSF104683	01, Waleed Hamed, 06-Waleed Hamed
HAMD209806-HAMD209809	01-Waleed Hamed, 06-Waleed Hamed
BDO_011270-011274	01-Waleed Hamed, 06-Waleed Hamed
BDO_012845-012845	01-Waleed Hamed, 06-Waleed Hamed
BDO_012801-012801	01-Waleed Hamed, 06-Waleed Hamed
BDO_010998-011007	01-Waleed Hamed, 06-Waleed Hamed
HAMD623090-HAMD623337	01-Waleed Hamed, 06-Waleed Hamed
BDO_010023-010032	01-Waleed Hamed, 06-Waleed Hamed
BDO_011260-011264	01-Waleed Hamed, 06-Waleed Hamed
BDO_009604-009613	01-Waleed Hamed, 06-Waleed Hamed
HAMD618735-HAMD618926	01-Waleed Hamed, 06-Waleed Hamed
BDO_011088-011097	01-Waleed Hamed, 06-Waleed Hamed
BDO_014936-014936	01-Waleed Hamed, 06-Waleed Hamed
BDO_012929-012936	01-Waleed Hamed, 06-Waleed Hamed
BDO_015336-015336	01-Waleed Hamed, 06-Waleed Hamed
HAMD209762-HAMD209764	01-Waleed Hamed, 06-Waleed Hamed
BDO_010679-010692	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012840-012840	01-Waleed Hamed, 06-Waleed Hamed
BDO_012825-012825	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
BDO_011409-011413	01-Waleed Hamed, 06-Waleed Hamed
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BDO_013469-013488	01-Waleed Hamed, 06-Waleed Hamed
BDO_011379-011383	01-Waleed Hamed, 06-Waleed Hamed
BDO_009268-009271	01-Waleed Hamed, 06-Waleed Hamed
BDO_014887-014887	01-Waleed Hamed, 06-Waleed Hamed
BDO_010847-010856	01-Waleed Hamed, 06-Waleed Hamed
BDO_014935-014935	01-Waleed Hamed, 06-Waleed Hamed
BDO_013057-013070	01-Waleed Hamed, 06-Waleed Hamed
BDO_015364-015364	01-Waleed Hamed, 06-Waleed Hamed
BDO_015333-015333	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012787-012787	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015555-015555	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015107-015108	01-Waleed Hamed, 06-Waleed Hamed
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HAMD624248-HAMD624321	01-Waleed Hamed, 06-Waleed Hamed
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HAMD621847-HAMD622378	01-Waleed Hamed, 06-Waleed Hamed
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BDO_012799-012799	01-Waleed Hamed, 06-Waleed Hamed
HAMD616835-HAMD616966	01-Waleed Hamed, 06-Waleed Hamed
HAMD617775-HAMD618006	01-Waleed Hamed, 06-Waleed Hamed

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Document Bates Range	RFPD Numbers
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BDO_014978-014978	01-Waleed Hamed, 06-Waleed Hamed
BDO_010260-010264	01-Waleed Hamed, 06-Waleed Hamed
BDO_014897-014897	01-Waleed Hamed, 06-Waleed Hamed
BDO_011364-011368	01-Waleed Hamed, 06-Waleed Hamed
HAMD440562-HAMD440569	01-Waleed Hamed, 06-Waleed Hamed
BDO_012792-012792	01-Waleed Hamed, 06-Waleed Hamed
BDO_009457-009466	01-Waleed Hamed, 06-Waleed Hamed
BDO_015566-015566	01-Waleed Hamed, 06-Waleed Hamed
BDO_013011-013034	01-Waleed Hamed, 06-Waleed Hamed
BDO_013197-013204	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010362-010369	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010484-010491	01-Waleed Hamed, 06-Waleed Hamed

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BDO_012800-012800	01-Waleed Hamed, 06-Waleed Hamed
BDO_013361-013373	01-Waleed Hamed, 06-Waleed Hamed
BDO_015165-015166	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010077-010086	01-Waleed Hamed, 06-Waleed Hamed
BDO_012794-012794	01-Waleed Hamed, 06-Waleed Hamed
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BDO_015326-015326	01-Waleed Hamed, 06-Waleed Hamed
BDO_013035-013056	01-Waleed Hamed, 06-Waleed Hamed
BDO_009959-009970	01-Waleed Hamed, 06-Waleed Hamed

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BDO_012844-012844	01-Waleed Hamed, 06-Waleed Hamed
BDO_009566-009575	01-Waleed Hamed, 06-Waleed Hamed
BDO_010250-010254	01-Waleed Hamed, 06-Waleed Hamed
BDO_011200-011205	01-Waleed Hamed, 06-Waleed Hamed
BDO_012867-012867	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010565-010572	01-Waleed Hamed, 06-Waleed Hamed

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BDO_015379-015379	01-Waleed Hamed, 06-Waleed Hamed
BDO_011346-011350	01-Waleed Hamed, 06-Waleed Hamed
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BDO_010988-010997	01-Waleed Hamed, 06-Waleed Hamed
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HAMD623904-HAMD624077	01-Waleed Hamed, 06-Waleed Hamed
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Document Bates Range	RFPD Numbers
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HAMD616703-HAMD616834	01-Waleed Hamed, 06-Waleed Hamed
BDO_010665-010678	01-Waleed Hamed, 06-Waleed Hamed
BDO_012861-012861	01-Waleed Hamed, 06-Waleed Hamed
BDO_013396-013405	01-Waleed Hamed, 06-Waleed Hamed
BDO_012866-012866	01-Waleed Hamed, 06-Waleed Hamed
BDO_009272-009275	01-Waleed Hamed, 06-Waleed Hamed
BDO_009276-009279	01-Waleed Hamed, 06-Waleed Hamed
HAMD616477-HAMD616478	01-Waleed Hamed, 06-Waleed Hamed
BDO_009843-009856	01-Waleed Hamed, 06-Waleed Hamed
BDO_012772-012776	01-Waleed Hamed, 06-Waleed Hamed
BDO_011457-011464	01-Waleed Hamed, 06-Waleed Hamed
BDO_014995-014995	01-Waleed Hamed, 06-Waleed Hamed
BDO_013224-013232	01-Waleed Hamed, 06-Waleed Hamed
BDO_005706-005708	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006085-006087	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005835-005840	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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Document Bates Range	RFPD Numbers
BDO_006054-006059	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005713-005714	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005750-005753	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005990-005994	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006000-006006	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005684-005687	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005881-005882	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005811-005821	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005902-005906	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005627-005629	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005841-005843	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006082-006084	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005797-005802	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005872-005876	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006036-006043	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005858-005863	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005744-005749	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005912-005915	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005780-005783	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006060-006064	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005975-005979	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006044-006049	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005701-005705	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_005864-005868	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005741-005743	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_005688-005690	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005933-005938	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005719-005723	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005877-005880	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_005848-005852	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005907-005911	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_005728-005735	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005844-005847	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005916-005925	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
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BDO_006065-006070	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005971-005974	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005869-005871	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005987-005989	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005926-005932	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed

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BDO_005694-005696	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006092-006094	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_006071-006073	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005762-005765	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005939-005946	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_005697-005700	01-Waleed Hamed, Mufeed Hamed, 06-Waleed Hamed, Mufeed Hamed
BDO_007269-007274	01-Waleed Hamed, Waheed Hamed, 06-Waleed Hamed, Waheed Hamed
FBIX337329-FBIX338478	01-Waleed Hamed, Waheed Hamed, 06-Waleed Hamed, Waheed Hamed
BDO_007664-007665	01-Waheed Hamed, 06-Waheed Hamed
BDO_007645-007650	01-Waheed Hamed, 06-Waheed Hamed
BDO_007436-007439	01-Waheed Hamed, 06-Waheed Hamed
HAMD305287-HAMD305290	01-Waheed Hamed, 06-Waheed Hamed
BDO_007583-007586	01-Waheed Hamed, 06-Waheed Hamed
BDO_007420-007423	01-Waheed Hamed, 06-Waheed Hamed
BDO_007448-007451	01-Waheed Hamed, 06-Waheed Hamed
BDO_007596-007600	01-Waheed Hamed, 06-Waheed Hamed
BDO_007628-007628	01-Waheed Hamed, 06-Waheed Hamed
HAMD277551-HAMD277552	01-Waheed Hamed, 06-Waheed Hamed
BDO_007352-007356	01-Waheed Hamed, 06-Waheed Hamed
HAMD305346-HAMD305346	01-Waheed Hamed, 06-Waheed Hamed
BDO_007283-007287	01-Waheed Hamed, 06-Waheed Hamed
HAMD405240-HAMD405243	01-Waheed Hamed, 06-Waheed Hamed
HAMD306173-HAMD306173	01-Waheed Hamed, 06-Waheed Hamed
HAMD305332-HAMD305335	01-Waheed Hamed, 06-Waheed Hamed
BDO_007679-007684	01-Waheed Hamed, 06-Waheed Hamed
BDO_007362-007366	01-Waheed Hamed, 06-Waheed Hamed
BDO_007587-007591	01-Waheed Hamed, 06-Waheed Hamed
BDO_007336-007341	01-Waheed Hamed, 06-Waheed Hamed
BDO_007638-007639	01-Waheed Hamed, 06-Waheed Hamed
HAMD305366-HAMD305369	01-Waheed Hamed, 06-Waheed Hamed
HAMD305370-HAMD305373	01-Waheed Hamed, 06-Waheed Hamed
BDO_007466-007468	01-Waheed Hamed, 06-Waheed Hamed

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BDO_007566-007570	01-Waheed Hamed, 06-Waheed Hamed
BDO_007456-007459	01-Waheed Hamed, 06-Waheed Hamed
HAMD305308-HAMD305308	01-Waheed Hamed, 06-Waheed Hamed
BDO_007520-007524	01-Waheed Hamed, 06-Waheed Hamed
HAMD405208-HAMD405208	01-Waheed Hamed, 06-Waheed Hamed
BDO_007394-007398	01-Waheed Hamed, 06-Waheed Hamed
BDO_007571-007574	01-Waheed Hamed, 06-Waheed Hamed
BDO_007651-007652	01-Waheed Hamed, 06-Waheed Hamed
BDO_007469-007469	01-Waheed Hamed, 06-Waheed Hamed
BDO_007428-007431	01-Waheed Hamed, 06-Waheed Hamed
HAMD405203-HAMD405207	01-Waheed Hamed, 06-Waheed Hamed
HAMD305313-HAMD305316	01-Waheed Hamed, 06-Waheed Hamed
BDO_007616-007620	01-Waheed Hamed, 06-Waheed Hamed
BDO_007371-007374	01-Waheed Hamed, 06-Waheed Hamed
FBIX262192-FBIX262194	01-Waheed Hamed, 06-Waheed Hamed
HAMD405213-HAMD405213	01-Waheed Hamed, 06-Waheed Hamed
BDO_007499-007502	01-Waheed Hamed, 06-Waheed Hamed
HAMD305388-HAMD305392	01-Waheed Hamed, 06-Waheed Hamed
BDO_007452-007455	01-Waheed Hamed, 06-Waheed Hamed
HAMD405214-HAMD405217	01-Waheed Hamed, 06-Waheed Hamed
BDO_007465-007465	01-Waheed Hamed, 06-Waheed Hamed
BDO_007549-007553	01-Waheed Hamed, 06-Waheed Hamed
BDO_007627-007627	01-Waheed Hamed, 06-Waheed Hamed
HAMD405244-HAMD405247	01-Waheed Hamed, 06-Waheed Hamed
BDO_007592-007595	01-Waheed Hamed, 06-Waheed Hamed
BDO_007348-007351	01-Waheed Hamed, 06-Waheed Hamed
BDO_007480-007483	01-Waheed Hamed, 06-Waheed Hamed
BDO_007562-007565	01-Waheed Hamed, 06-Waheed Hamed
BDO_007626-007626	01-Waheed Hamed, 06-Waheed Hamed
BDO_007432-007435	01-Waheed Hamed, 06-Waheed Hamed
HAMD305360-HAMD305363	01-Waheed Hamed, 06-Waheed Hamed
BDO_007440-007443	01-Waheed Hamed, 06-Waheed Hamed
BDO_007686-007688	01-Waheed Hamed, 06-Waheed Hamed
BDO_007367-007370	01-Waheed Hamed, 06-Waheed Hamed
BDO_007659-007663	01-Waheed Hamed, 06-Waheed Hamed
BDO_007379-007383	01-Waheed Hamed, 06-Waheed Hamed
HAMD405209-HAMD405212	01-Waheed Hamed, 06-Waheed Hamed
BDO_007519-007519	01-Waheed Hamed, 06-Waheed Hamed
HAMD405236-HAMD405239	01-Waheed Hamed, 06-Waheed Hamed
HAMD305383-HAMD305383	01-Waheed Hamed, 06-Waheed Hamed
BDO_007403-007406	01-Waheed Hamed, 06-Waheed Hamed
BDO_007641-007644	01-Waheed Hamed, 06-Waheed Hamed
BDO_007484-007488	01-Waheed Hamed, 06-Waheed Hamed
BDO_007666-007669	01-Waheed Hamed, 06-Waheed Hamed

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HAMD306191-HAMD306191	01-Waheed Hamed, 06-Waheed Hamed
BDO_007375-007378	01-Waheed Hamed, 06-Waheed Hamed
BDO_008032-008041	01-Waheed Hamed, 06-Waheed Hamed
BDO_007579-007582	01-Waheed Hamed, 06-Waheed Hamed
HAMD305347-HAMD305350	01-Waheed Hamed, 06-Waheed Hamed
BDO_007607-007611	01-Waheed Hamed, 06-Waheed Hamed
BDO_007539-007543	01-Waheed Hamed, 06-Waheed Hamed
BDO_007703-007705	01-Waheed Hamed, 06-Waheed Hamed
HAMD305351-HAMD305354	01-Waheed Hamed, 06-Waheed Hamed
BDO_007424-007427	01-Waheed Hamed, 06-Waheed Hamed
BDO_007625-007625	01-Waheed Hamed, 06-Waheed Hamed
HAMD278441-HAMD278441	01-Waheed Hamed, 06-Waheed Hamed
BDO_007601-007603	01-Waheed Hamed, 06-Waheed Hamed
BDO_007706-007708	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007700-007702	01-Waheed Hamed, 06-Waheed Hamed
HAMD405218-HAMD405218	01-Waheed Hamed, 06-Waheed Hamed
BDO_007384-007388	01-Waheed Hamed, 06-Waheed Hamed
BDO_007554-007557	01-Waheed Hamed, 06-Waheed Hamed
BDO_007389-007393	01-Waheed Hamed, 06-Waheed Hamed
HAMD305286-HAMD305286	01-Waheed Hamed, 06-Waheed Hamed
HAMD405223-HAMD405229	01-Waheed Hamed, 06-Waheed Hamed
BDO_007534-007538	01-Waheed Hamed, 06-Waheed Hamed
HAMD305328-HAMD305331	01-Waheed Hamed, 06-Waheed Hamed
BDO_007342-007347	01-Waheed Hamed, 06-Waheed Hamed
BDO_007508-007512	01-Waheed Hamed, 06-Waheed Hamed
BDO_007416-007419	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007694-007696	01-Waheed Hamed, 06-Waheed Hamed
BDO_007629-007637	01-Waheed Hamed, 06-Waheed Hamed
BDO_007472-007472	01-Waheed Hamed, 06-Waheed Hamed
BDO_007673-007678	01-Waheed Hamed, 06-Waheed Hamed
BDO_007470-007471	01-Waheed Hamed, 06-Waheed Hamed
HAMD305291-HAMD305295	01-Waheed Hamed, 06-Waheed Hamed
BDO_007407-007411	01-Waheed Hamed, 06-Waheed Hamed
BDO_007558-007561	01-Waheed Hamed, 06-Waheed Hamed
HAMD305384-HAMD305387	01-Waheed Hamed, 06-Waheed Hamed
HAMD405219-HAMD405222	01-Waheed Hamed, 06-Waheed Hamed
BDO_007460-007464	01-Waheed Hamed, 06-Waheed Hamed
BDO_007709-007711	01-Waheed Hamed, 06-Waheed Hamed
BDO_007494-007498	01-Waheed Hamed, 06-Waheed Hamed
BDO_007357-007361	01-Waheed Hamed, 06-Waheed Hamed
BDO_007604-007606	01-Waheed Hamed, 06-Waheed Hamed
BDO_007529-007533	01-Waheed Hamed, 06-Waheed Hamed

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HAMD405202-HAMD405202	01-Waheed Hamed, 06-Waheed Hamed
BDO_007685-007685	01-Waheed Hamed, 06-Waheed Hamed
BDO_007444-007447	01-Waheed Hamed, 06-Waheed Hamed
BDO_007473-007473	01-Waheed Hamed, 06-Waheed Hamed
FBIX262447-FBIX262467	01-Waheed Hamed, 06-Waheed Hamed
BDO_007653-007658	01-Waheed Hamed, 06-Waheed Hamed
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BDO_007525-007528	01-Waheed Hamed, 06-Waheed Hamed
BDO_007474-007479	01-Waheed Hamed, 06-Waheed Hamed
BDO_007503-007507	01-Waheed Hamed, 06-Waheed Hamed
BDO_007489-007493	01-Waheed Hamed, 06-Waheed Hamed
BDO_007513-007518	01-Waheed Hamed, 06-Waheed Hamed
BDO_013224-013232	01-Waheed Hamed, 06-Waheed Hamed
HAMD641485-HAMD642240	04, 08, 15, 21, 22, 34
YUSF114394-YUSF114395	4
HAMD594603-HAMD594673	4
HAMD594674-HAMD594675	4
HAMD629722-HAMD630014	04, 06-Waleed Hamed, 07, 21
HAMD612386-HAMD612642	04, 06-Waleed Hamed, 07, 21
HAMD644447-HAMD644512	04, 06-Waleed Hamed, 21
HAMD642997-HAMD643434	04, 08, 15
HAMD659858-HAMD659858	04, 21
HAMD607462-HAMD607463	05-Mufeed Hamed
HAMD607454-HAMD607455	05-Mufeed Hamed
HAMD607474-HAMD607495	05-Mufeed Hamed
HAMD563339-HAMD563340	05-Mufeed Hamed
HAMD607458-HAMD607459	05-Mufeed Hamed
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HAMD607456-HAMD607457	05-Mufeed Hamed
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HAMD607472-HAMD607473	05-Mufeed Hamed
HAMD607496-HAMD607526	05-Mufeed Hamed
HAMD277434-HAMD277468	05-Mufeed Hamed, 07
HAMD607527-HAMD607561	05-Mufeed Hamed, 07
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HAMD563282-HAMD563297	05-Mohammad Hamed
HAMD277399-HAMD277433	05-Mohammad Hamed, 07
HAMD593785-HAMD593786	05-Mohammad Hamed, 07
HAMD593787-HAMD593787	05-Mohammad Hamed, 07
HAMD609081-HAMD609095	05-Mohammad Hamed,Mufeed Hamed,Hisham Hamed, 07
HAMD607879-HAMD607879	05-Hisham Hamed
HAMD608117-HAMD608117	05-Hisham Hamed
HAMD607993-HAMD608007	05-Hisham Hamed
HAMD609059-HAMD609077	05-Hisham Hamed
HAMD608904-HAMD608904	05-Hisham Hamed
HAMD608372-HAMD608372	05-Hisham Hamed
HAMD608223-HAMD608236	05-Hisham Hamed
HAMD607770-HAMD607838	05-Hisham Hamed
HAMD608905-HAMD608905	05-Hisham Hamed
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HAMD608098-HAMD608116	05-Hisham Hamed
HAMD608237-HAMD608237	05-Hisham Hamed
HAMD608761-HAMD608761	05-Hisham Hamed
HAMD608576-HAMD608588	05-Hisham Hamed
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HAMD608359-HAMD608371	05-Hisham Hamed
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HAMD608008-HAMD608009	05-Hisham Hamed
HAMD608760-HAMD608760	05-Hisham Hamed
HAMD608748-HAMD608759	05-Hisham Hamed
HAMD563327-HAMD563328	05-Hisham Hamed
HAMD607839-HAMD607839	05-Hisham Hamed
HAMD609116-HAMD609146	05-Hisham Hamed
HAMD609115-HAMD609115	05-Hisham Hamed
HAMD277294-HAMD277324	05-Hisham Hamed
HAMD608886-HAMD608903	05-Hisham Hamed
HAMD607747-HAMD607769	05-Hisham Hamed
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HAMD609147-HAMD609181	05-Hisham Hamed, 07
HAMD277364-HAMD277398	05-Hisham Hamed, 07
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HAMD607218-HAMD607258	05-Waleed Hamed
YUSF106160-YUSF106171	05-Waleed Hamed
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HAMD607351-HAMD607403	05-Waleed Hamed
YUSF106209-YUSF106239	05-Waleed Hamed
YUSF106184-YUSF106191	05-Waleed Hamed
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YUSF106172-YUSF106183	05-Waleed Hamed
HAMD432199-HAMD432209	05-Waleed Hamed
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HAMD277434-HAMD277468	05-Mufeed Hamed, 07
HAMD225828-HAMD225845	05-Mufeed Hamed, Waleed Hamed, 07
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YUSF106292-YUSF106292	06-Waleed Hamed, 11
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YUSF106293-YUSF106302	06-Waleed Hamed, 11
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BDO_002403-002410	08, 16
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BDO_001169-001175	08, 16
HAMD646930-HAMD646930	08, 19
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HAMD598599-HAMD599314	08, 19
BDO_000001-000001	08, 19
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HAMD599315-HAMD599665	08, 19
HAMD600333-HAMD600482	08, 19
HAMD248055-HAMD248057	08,16
HAMD563377-HAMD563378	9
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YUSF102523-YUSF102523	9
HAMD592007-HAMD592007	9
FBIX339272-FBIX339301	09, 10
HAMD591991-HAMD592006	09,10
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JVZ-000001-JVZ-000867	10, 13, 14, 15, 17, 18
JVZ-000868-JVZ-001730	10, 13, 14, 15, 17, 18
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YUSF101694-YUSF101710	11
BDO_004167-004168	11
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BDO_004275-004275	11
BDO_004264-004264	11
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BDO_004103-004103	11
BDO_004165-004166	11
BDO_004339-004339	11

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HAMD588657-HAMD588657	14
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HAMD633372-HAMD633372	14
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HAMD594305-HAMD594305	14
HAMD562233-HAMD562234	14
HAMD594355-HAMD594356	14
HAMD590700-HAMD590742	14
HAMD591985-HAMD591990	14
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HAMD630244-HAMD630244	14
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HAMD606244-HAMD606244	18
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HAMD633376-HAMD633376	18
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HAMD604669-HAMD604669	22
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HAMD606232-HAMD606252	22
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HAMD606873-HAMD606892	22
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HAMD604612-HAMD604612	23
YUSF237817-YUSF237882	23

**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

Consolidated with

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

vs.

FATHI YUSUF, *Defendant.*

Case No.: SX-2014-CV-278

Consolidated with

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*

Defendants.

Case No.: ST-17-CV-384

**PLAINTIFF/COUNTERCLAIM DEFENDANT WALEED HAMED'S
RESPONSES TO FATHI YUSUF'S INTERROGATORIES 1-33 [sic] TO HAMED**

Objection to all of the following:

This "claims" discovery is limited by the order of the Court to the *Revised Claims* submitted by the parties pursuant to the direction of the Special Master. All discovery must, therefore, relate to or be calculated to lead to discoverable evidence as to one of the claims set forth. Yusuf does not identify the Claims to which his inquiries relate -- and most do not relate to any of the remaining *Revised Claims*. (In Hamed's discovery each item is referenced to the specific claim.)

ROG 1. Please identify any and all assets including bank accounts (indicating account number and name of bank), brokerage accounts, real estate, interests in business ventures and other financial interests, foreign and domestic, owned by each of the following Hamed family members: 1) Hamed, 2) Waleed, 3) Waheed, 4) Mufeed Hamed and 5) Hisham as of September 17, 2006 and the date of your response and identify the source of all funds for the acquisition of such assets:

Hamed Response: Object: (1) overly broad, (2) not related to any claim as this appears to be a renewed effort to resurrect the "lifestyle" analysis that Judge Brady rejected. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24.

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts(Emphasis added.)

In addition (3) Hamed does not have his bank records for the date September 17, 2006 -
- and records he has "as of the date of these responses" is irrelevant. (4) The request is
oppressive and (5) overburdensome. Subject to those objections, Hamed states¹:

A. Property outside of the USVI

Hamed owns certain parcels of land either individually or with Fathi Yusuf in Jordan. Hamed objects to listing these individually as: (1) Yusuf has full and equal knowledge as to them, (2) they are outside of the jurisdiction of this Court and objections have been filed here on that basis. Subject to that, If Yusuf will pay for the title search, Hamed will have a title company supply a list of all properties owned.

B. Property in the USVI

Hamed and the Hamed sons own the property on which their houses are located. Mr. Hamed had small holdings of land worth less than \$250,000. Waleed Hamed also owns an apartment duplex in Carlton on St. Croix, purchased sometime around 1987. However, although **this question was not asked**, in the interest of full disclosure, they own stock in several companies, all known to Yusuf and United. All such properties are listed in the records of the Recorder of Deeds for the US Virgin Islands under the respective company names. Though the request does not inquire as to those properties,

¹In addition, Hamed states that the identical interrogatory was propounded to Yusuf/United in Hamed's Sixth Interrogatories on March 24, 2018. He believes that the Special Master's direction as to these identical interrogatories will be required -- and that whatever ruling is applied to Yusuf will most probably be applied to Hamed.

if Yusuf will pay for the title search, Hamed will have a title company supply a list of all properties owned by such corporate entities -- or depositions or subpoenae can be issued to said companies by Yusuf.

C. Stocks Outside of Investment Accounts

Hamed (or his Trust or Estate) along with his family members owns 50% of the stock of several USVI entities along with Yusuf of members of his family. These are all known to Yusuf. In addition, also known to Yusuf, are shares in KAC357 Inc. which owns the leases of the stores obtained from the partnership. In addition, the Hamed sons own shares in several corporations unrelated to this litigation and which compete with Yusuf. If a motion to compel this information is made, a motion for a protective order will be filed as a trade secret unrelated to the litigation.

D. Bank and Brokerage Accounts

Hamed owns no more bank accounts. As for the prior bank accounts of Hamed and his sons, Yusuf obtained the account numbers and records previously, served subpoenae and obtained the documents requested. Hamed and his sons have no such records, other than what was gathered by the FBI as part of the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15), which is equally available to Yusuf, before the current ones, which are irrelevant.

Yusuf's accountant (BDO) has testified by expert report that older bank records are not available. Subject to that (and the footnote), out of an abundance of caution, the Hameds list the following accounts, but do not know whether any of these accounts were transacted on or after September 17, 2006. Further, Wally Hamed's Cairo Amman bank statements for account numbers 02/501/171878/00 and 02/533/171878 were sent to Fathi Yusuf at the Tutu Park Plaza Extra location, St. Thomas, so he would be in the best

position to know that status of those accounts and both of Wally Hamed Banque Francaise Commercial accounts were sent to Isam Yousuf in Sint-Maarten.

Wally Hamed

Banco Popular – 194-602753

Banco Popular – 194-038515

Banco Popular – 191-716286

Banco Popular – 194-602753

Core States, First Pennsylvania Bank – 11150056080

Scotiabank – 5800308313

Virgin Islands Community Bank – 182605817

Virgin Islands Community Bank – 182556086

Merrill Lynch – 140-16184

Merrill Lynch – 140-82626

Merrill Lynch – 140-85240

Prudential Bache-Securities – 050-130830-2

Banque Francaise Commerciale – 40-60-63878-90

Banque Francaise Commerciale – 40-60-63878-91

Bellevue Abriere Guichet – 60638789040

Cairo Amman Bank - 02/501/171878/00

Cairo Amman Bank – 02/533/171878

Cairo Amman Bank – 6101863

Willie Hamed

Banco Popular – 594178865

Chase – 721-1-047688

Scotiabank – 2068417

Scotiabank – 55002244

Scotiabank – 55034622

Prudential Bache – 08-3640-022

Raymond James – 10221124

Raymond James – 10230982

Raymond James – 50245929

Raymond James – 50245934

Raymond James – 71962008

Raymond James – 71962013

Raymond James – 72946098

Mafi Hamed

Banco Popular – 191-045535

Banco Popular – 591-416998

Ideal – 191-045535

Scotiabank – 058-00119415

Scotiabank – 45609811

Merrill Lynch – 140-19156

Shawn Hamed

Banco Popular – 191-185515

Scotiabank – 044-55152125

Scotiabank – 60829213

Charles Schwab – 4062-0039

Morgan Keegan & Company – 76316041

Morgan Keegan & Company – 61009668

Popular Securities – PSP-021644

Raymond James – 10207203

TD Ameritrade – 788-441834

TD Ameritrade – 788-441996

Wally, Willie, Mafi and Shawn Hamed

Scotiabank – 92032496

Wally and Mafi Hamed

Scotiabank – 058- 45609811

Shawn and Willie Hamed

Charles Schwab – 4101-9260

Mafi and Amal Hamed

Banco Popular 191-045535

ROG 2. Please identify each and every asset and interest, foreign and domestic, owned by Mohammad Hamed as of September 1, 2012 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.

Hamed Response: See response to Interrogatory 1. In addition, Hamed does not have his bank records for the date of September 1, 2012 and the request is oppressive and overburdensome. Subject to those objections, Hamed states²:

A. Property outside of the USVI

²In addition, Hamed states that the identical interrogatory was propounded to Yusuf/United in Hamed's Sixth Interrogatories on March 24, 2018. He believes that the Special Master's direction as to these identical interrogatories will be required -- and that whatever ruling is applied to Yusuf will most probably be applied to Hamed.

Hamed owns certain parcels of land either individually or with Fathi Yusuf in Jordan. Hamed object to listing these as: (1) Yusuf has full and equal knowledge as to them, (2) they are outside of the jurisdiction of this Court and objections have been filed here on that basis. Subject to that, if Yusuf will pay for the title search, Hamed will have a title company supply a list of all properties owned.

B. Property in the USVI

Hamed owned his personal residence, along with several small real estate holdings on St. Croix in September 2012. His wife is still living in their personal residence. Mr. Hamed is no longer living, so we are unable to ask him about the source of income or the disposition of assets.

C. Stocks outside of Investment Accounts

Mr. Hamed had the following on September 1, 2012: 10% of the shares (10 shares) of Plessen Enterprises, Inc., which owns over 100 acres of prime real estate on St. Croix and over 8 acres of prime real estate on St. Thomas, all unencumbered, with a monthly income of approximately \$100,000 per month and over \$1.6 million currently in its bank account; 50% of the shares (500 shares) of Peters Farm, Inc., which owns over 100 acres of property on St. Croix as well as over 100 acres of land on St. Thomas, all unencumbered; 10% of the shares in Sixteen Plus, Inc., which owns over 100 acres of prime beach front property on the south shore of St. Croix. The property does have a mortgage recorded against it in favor of Fathi Yusuf's niece, which is the subject of several lawsuits pending on St. Croix, including one alleging that the mortgage is invalid. Mr. Hamed is no longer living, so we are unable to ask him about the source of income for these shares, but since Mr. Yusuf also owns shares in each of the companies listed, he is in a position to know about the source of funds.

D. Bank Accounts

Hamed owns no more bank accounts. As for the prior bank accounts of Hamed, Yusuf obtained the account numbers and records previously and served subpoenae. Yusuf's accountant (BDO) has testified by expert report that older bank records are not available. See response to Interrogatory 1.

ROG 3. Please identify all sources of income for 1) Hamed, 2) Waleed, 3) Waheed, 4) Mufeed and, 5) Hisham from September 17, 2006 to present including the total amount of said income from each source per year.

Hamed Response: See response to Interrogatory 1. Subject to that³,

1. Sources of income

The Hameds received income from the Partnership until it was divided. In addition, the Hamed sons have drawn salaries from the business operations of the stores purchased from the Partnership and other stores. Income has also been derived from rental property. Their income after the date of that split is irrelevant to this action. If a motion to compel this information is made, a motion for a protective order will be filed as a trade secret unrelated to the litigation.

2. Amounts of income

It is impossible, based on the records in their possession and control, to calculate the amounts of income prior to the split other than for the past few tax reporting years. To the extent the income was derived from their salaries at the Partnership, it is known equally to Yusuf. Their income after the date of that split is irrelevant to this action. If a

³In addition, Hamed states that the identical interrogatory was propounded to Yusuf/United in Hamed's Sixth Interrogatories on March 24, 2018. He believes that the Special Master's direction as to these identical interrogatories will be required -- and that whatever ruling is applied to Yusuf will most probably be applied to Hamed.

motion to compel this information is made, a motion for a protective order will be filed as a trade secret unrelated to the litigation.

ROG 4. Please describe who selected counsel to represent the Hamed 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?

Hamed Response: As Yusuf has alleged that he directed all such counsel and because they were paid through accounts he had access to or (for a period, unilaterally controlled and excluded Hameds) that information is known to him equally. Subject to that objection, Hamed states the incomplete extent of his knowledge as follows:

Initially, Fathi Yusuf hired Robert King to represent him in the criminal case. Maher "Mike" and Fathi Yusuf, and Waleed "Wally" and Waheed "Willie" Hamed all met with Attorney King on St. Thomas after Fathi Yusuf hired him. Attorney King told Mike Yusuf and Wally and Willie Hamed that they each needed to retain their own attorneys. When the three asked him for recommendations, Attorney King proceeded to thumb through the yellow pages of the phone book looking for potential lawyers for the three men.

After the meeting with Attorney King, when Mike Yusuf and Wally Hamed returned to St. Croix, they determined that they would need to find other attorneys, as Attorney King's method was not inspiring confidence. After meeting with other attorneys who had represented the families in the past and gathering recommendations, Mike Yusuf and Wally Hamed decided they wanted to hire Gordon Rhea. The two obtained the consent of Fathi Yusuf to hire Attorney Rhea as joint counsel. According to the criminal docket, Attorney Rhea entered an appearance as counsel to lead defendant United on November 6, 2003. Attorney Rhea, as counsel to United (for the Partnership), then put the team together a team of lawyers for the defendants as a group, who would all work under his

overall oversight, collectively for the defendants. Attorney King did not like this arrangement and insisted on continuing as Fathi Yusuf's personal (i.e. non-team) attorney, operating somewhat independently from Attorney Rhea's team.

Selection of Counsel

Attorney Rhea recommended hiring attorneys Jack Dema, Derek Hodge, Randy Andreozzi and Pam Colon for the benefit of all defendants -- who would represent everyone as a group, but would enter appearances for Rhea-assigned individuals. Attorney Rhea's recommendations and assignments were accepted. (*See discussion of the Joint Defense Agreement below.*) According to the criminal case docket: Jack Dema entered an appearance for Mike Yusuf on March 12, 2004; Derek Hodge entered an appearance for Nejeih Yusuf on March 24, 2004; Pam Colon entered an appearance for Willie Hamed on June 24, 2004 and Randy Andreozzi was pro haced in on a motion by Gordon Rhea for Wally Hamed on November 19, 2004. Also on November 19, 2004, Tom Alkon was substituted as counsel for the United Corporation.

After the joint legal team had been assembled, the team was allowed to review and copy the documents the FBI had collected. Attorney Rhea coordinated the copying of the documents for the legal team, but Attorney King did not want to be a part of that effort. Instead, he insisted on copying documents himself. When the bills for the copying came, to the best of Wally Hamed's recollection, Attorney Rhea's bill was approximately \$60,000-\$70,000 for copying the documents. Attorney King, doing the exact same thing, submitted a bill for approximately \$345,000. At this point, Fathi Yusuf was persuaded that continuing to employ Attorney King separately was not cost effective. Attorney King was fired and on August 6, 2004, Attorney Hank Smock entered an appearance for the team, nominally representing Fathi Yusuf.

At a later date and after the initial legal team was retained, Bruce Cole was hired in 2007 or 2008 to represent the non-indicted shareholders for the United Corporation.

Eventually, Fathi Yusuf hired Atty. Joe DiRuzzo to represent him in the criminal case (and perhaps Nizar DeWood). Attorney DiRuzzo's hiring precipitated the ending of the Joint Defense Agreement. Thus, after September 19, 2012, all counsel ceased to be part of a team, or be paid by the Partnership.

Payment of Counsel and Source of Payment

A Joint Defense Agreement ("JDA") was entered into for the purpose of representing all of the defendants (and did include Hank Smock and Bruce Cole) collectively. The JDA did not expire until September 19, 2012. According to Gordon Rhea's March 2, 2017 declaration, under the Joint Defense Agreement:

- a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.
- b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.
- c. Simply because a bill was 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 place.
- d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.
- e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account. . . .

See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case,

Attorney Rhea, with the consent of Fathi Yusuf, set up an escrow account at his law firm to pay all of the attorneys. All attorneys' fees were paid for by the Partnership. A centralized escrow account was established in order to manage the attorneys' fees payments. Because all of the Partnership's accounts were frozen by the government, Attorney Rhea had to file a motion with the court to secure funds to pay for the defendants' representation. The court allowed an initial draw of \$2 million for the escrow account. This funding and subsequent escrow funding came from the Partnership accounts. This process continued for some time—Attorney Rhea had to request periodic funding from the court.

To make a draw from the escrow account, attorney's invoices were sent to Rhea's escrow agent at his firm, Richardson, Patrick, Westbrook & Brickman. The escrow agent would then send an email with the invoice generally to Wally Hamed. After receiving the invoice, Wally Hamed would circulate it to Fathi and Mike Yusuf. Wally Hamed approved payments from the escrow account.

Although the date is unknown, the escrow account moved from Gordon Rhea's firm to Andreozzi, Fickess, LLP. At some point, the Yusufs and Hameds gained approval to write checks directly from the Partnership accounts and checks for attorneys' fees were signed by whomever was available, including Fathi Yusuf. To the best of Wally Hamed's recollection, these checks were under \$10,000 as checks larger than that required approval from the government's monitor. See, e.g., HAMD606918-HAMD606918, \$9,420.00 partnership check written to Smock & Moorhead on December 22, 2011.

The exception to the described fee payment process above occurred when, in 2012, Fathi Yusuf refused to sign partnership checks totaling \$332,900 to pay for attorneys' fees that were incurred under and prior to the expiration of the Joint Defense

Agreement. This amount, \$332,900, was paid by Mohammad Hamed out of his personal bank account. See also, Claim H-17.

After the Joint Defense Agreement ended on September 19, 2012, the Partnership ceased to pay for legal fees associated with the criminal case and each individual paid his own attorney's fees.

Amount Each Counsel was Paid

In accordance with Rule 33(d) of the Virgin Islands Rules of Civil Procedure, Hamed cannot, in good faith, prepare an answer to this question from the information in his possession and reasonably available to him. As all attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants, Hamed cannot in the exercise of reasonable efforts, prepare an answer to the question of the amount each counsel was paid.

Subject to this objection, see the responses to Interrogatories 21, 24 and 25 and the corresponding RFPDs, including RFPD 23. Documents relating to this interrogatory include:

- September 30, 2016 JVZ Engagement Report and Exhibits, JVZ-000001-JVZ-000867.pdf and JVZ-000868-JVZ-001730.pdf
- Gordon Rhea's March 2, 2017 declaration, Exhibit 44, HAMD641485-HAMD642240.pdf
- Judge Barnard's April 17, 2014 Memorandum and Order in the criminal case, HAMD599941-HAMD599944.pdf
- September 19, 2012 email to members of the Joint Defense Agreement and Joseph DiRuzzo, Esq., from Gordon Rhea, Esq. regarding termination of the joint defense agreement, HAMD201592-HAMD201593.pdf

- September 14, 2012 letter to members of the Joint Defense Agreement from Joseph DiRuzzo, Esq. asking whether members believe he is part of the Joint Defense Agreement, HAMD201590-HAMD201591.pdf.
- September 13, 2012 letter to Joseph DiRuzzo, Esq. from Randall Andreozzi, Esq., that Attorney DiRuzzo is not a party to the Joint Defense Agreement, HAMD201586-HAMD201587.pdf.
- September 13, 2012 letter to Joseph DiRuzzo, Esq. from Pamela Colon, Esq. confirming that Attorney DiRuzzo is not a party to the Joint Defense Agreement, HAMD201588-HAMD201589.pdf.
- July 7, 2011 Order, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, regarding the immediate release of \$300,000 from United Corporation to the escrow account of the law offices of Andreozzi and Fickess, LLP, HAMD202721-HAMD202721.pdf.
- June 27, 2011 motion, Defendants' Motion for Release of Funds from United Corporation, requesting release of \$300,000 000 from United Corporation to the escrow account of the law offices of Andreozzi and Fickess, LLP, HAMD248051-HAMD248053.pdf.
- December 15, 2010 Order, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, ordering the release of \$250,000 to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD659180-HAMD659180.pdf.
- December 10, 2010 motion, Defendants' Motion for Release of Funds from United Corporation, *United States v Yusuf*, US District Court of the Virgin Islands, Division

of St. Croix, 1:05-cr-15, requesting \$250,000 to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD202691-HAMD202694.pdf.

- March 16, 2010 Order, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, ordering the release of \$1 million to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD202587-HAMD202587.pdf.
- March 1, 2010 motion, Defendants' Motion for Release of Funds from United Corporation, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, requesting \$1 million to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD202558-HAMD202562.pdf.
- December 22, 2011 partnership check written to Smock & Moorhead for \$9,420.00, HAMD606918-HAMD606918.pdf.

ROG 5. What do you contend would be the proper reconciliation of the Partner accounts as of September 17, 2006 and the respective amounts due to each Partner as of that date and the date of your response?

Hamed Response: Object. Unanswerable. As the Court pointed out in the referenced decision, it is impossible, because of how Yusuf kept the partnership's records, to determine the status of those accounts on that date. The Court stated in *Hamed v. Yusuf, et al.*, SX-12-CV-370; SX-14-278; SX-14-287, Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at p. 28:

As managing partner, Yusuf was not only intimately familiar with the methods of record keeping, or lack thereof, employed by the partnership, but was the one responsible for designing and implementing those procedures in the first place. It was Yusuf's responsibility to oversee, account for, and periodically reconcile the distributions of funds between the partners.

Subject to those objections, Hamed provides the following as to the "determinability" of such amounts. Hamed employed an expert CPA to review the accounting records that had been kept for the Partnership by Fathi Yusuf prior to 2012. He was asked to research whether it was possible to provide an accurate accounting of the partnership accounts before 2012 either by reviewing existing accounting records or reconstructing comprehensive or cohesive partnership transactions for Plaza Extra Supermarkets prior to 2012. This was submitted as an expert report to the Court.

Hamed thus states that to his knowledge and the knowledge of his CPA experts who work frequently with this and similar accounting systems and are experienced in their use—and the act of accounting for different businesses on such systems—the present "books and accounting records" of Plaza Extra Supermarkets as kept on the Sage50 system only really began with 2012. The underlying documents, *e.g.*, invoices, canceled checks, bank statements, also are incomplete for 2012.

Despite statements and misrepresentations to the contrary, Fathi Yusuf kept no cohesive books and records from the inception of the Partnership to 2012. A large number of documents obtained from the U.S. Attorney/FBI and supplied to Mr. Hamed do contain some information and HAVE been supplied to Yusuf by Hamed. The computer disk containing some or all of the 2003-2012 accountings was destroyed or damaged by defect while in Yusuf's possession or control, and John Gaffney states there was no full backup kept. Gaffney also testified that the records before 2012 were of little accounting value and were little more than bank reconciliations. However, the two plea agreements involving the computation of income and taxes for the period from 2001 to 2013 have been supplied to Yusuf.

Therefore, based on all available data, Hamed believes that no set of useable or reliable accounting records from the inception of the Partnership to 2012 exist and that it is impossible to reconstruct the accounting transactions of Plaza Extra Supermarkets for those years.

ROG 6. Identify all distributions from the Partnership to any member of the Hamed family from September 17, 2006 to present?

Hamed Response: Object. It is impossible, because of how Yusuf kept the partnership's records, to determine the status of those accounts on that date. The Court stated in *Hamed v. Yusuf, et al.*, SX-12-CV-370; SX-14-278; SX-14-287, Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at p. 28:

As managing partner, Yusuf was not only intimately familiar with the methods of record keeping, or lack thereof, employed by the partnership, but was the one responsible for designing and implementing those procedures in the first place. It was Yusuf's responsibility to oversee, account for, and periodically reconcile the distributions of funds between the partners.

Subject to those objections, Hamed provides the following as to the "determinability" of such amounts. Hamed employed an expert CPA to review the accounting records that had been kept for the Partnership by Fathi Yusuf prior to 2012. He was asked to research whether it was possible to provide an accurate accounting of the partnership accounts before 2012 either by reviewing existing accounting records or reconstructing comprehensive or cohesive partnership transactions for Plaza Extra Supermarkets prior to 2012. Hamed states that to his knowledge and the knowledge of his experts who work frequently with this and similar accounting systems and are experienced in their use—and the act of accounting for different businesses on such systems—the present "books and accounting records" of Plaza Extra Supermarkets as kept on the Sage50 system only really began with 2012. The underlying documents, e.g.,

invoices, canceled checks, bank statements, also are incomplete for 2012. Despite statements and misrepresentations to the contrary, Fathi Yusuf kept no cohesive books and records for the period 2003 to 2012. A large number of documents obtained from the U.S. Attorney/FBI and supplied to Mr. Hamed do contain some information and HAVE been supplied to Yusuf by Hamed. The computer disk containing some or all of the 2003-2012 accountings was destroyed or damaged by defect while in Yusuf's possession or control, and Gaffney states there was no full backup kept. Gaffney also testified that the records before 2012 were of little accounting value and were little more than bank reconciliations. However, the two plea agreements involving the computation of income and taxes for the period from 2001 to 2013 have been supplied to Yusuf.

Therefore, based on all available data, Hamed believes that no set of useable or reliable accounting records from the inception of the Partnership to 2012 exist and it is impossible to reconstruct the accounting transactions of Plaza Extra Supermarkets for those years.

ROG 7. Do you contest any allocation to you as set forth in Tables 1-6 for transactions after September 17, 2006, attached hereto as Exhibit 1, and, if so, which ones are contested and why?

Hamed Response: Yes. As a general matter, the BDO tables in Exhibit 1 are incorrect, are based on incomplete data, and are – by the admission of Yusuf's own experts – inaccurate and incomplete. See p. 2 and 22 of the BDO Report (emphasis added).

[At 2] records were prepared in an **informal manner**.

[At 22] Our report and the findings included herein have been impacted by the **limitation of the information available** in the Case. Following is a summary of the limitations we encountered during the performance of the engagement.

* * * *

Accounting records and/or documents (checks registers, bank reconciliations, deposits and disbursements of Supermarkets' accounts) provided in connection with Supermarkets were limited to covering the period from 2002 through 2004, East and West from 2006 through 2012, and Tutu Park from 2009 through 2012.

Accounting records and/or documents provided to us for the periods prior to 2003 are incomplete and limited to bank statements, deposit slips, cancelled checks, check registers, investments and broker statements, cash withdrawal tickets/receipts and cash withdrawal receipt listings. **For example, the retention policy for statements, checks, deposits, credits in Banco Popular de Puerto Rico is seven years; therefore, there is no Bank information available prior to 2007** and electronic transactions do not generate any physical evidence as to regular deposits and/or debits. Information discovered about the case up to August 31, 2014. We only considered information up to December 31, 2012. Transactions after that date were adjusted in our report.

Any monies identified through our analysis in excess of the amount identified from the known sources of income (e.g. salaries, rent income, etc.) **were assumed** to be partnership withdrawals/distributions. With regards to the Hamed family,

The lifestyle analysis is supported by **available information** related to deposits to banks and brokerage accounts and payments to credit cards during the period from January 1994 to December 2012 or until Gaffney was assigned to work with the Supermarkets accounting.

Second, Judge Brady also found the reports lacking in terms of comprehensiveness and he also rejected BDO's purported "lifestyle" analysis. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24 (emphasis added).

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts

Finally, Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017).

Subject to those objections, Hamed states the following:

Table 1 – Hamed objects to Table 1. The \$3 million distributed to Fathi and Fawzia Yusuf were Partnership distributions to them alone. Their affidavits clearly state that the amounts were gifts to Mafi and Shawn Hamed. Nothing in the affidavits suggest that the gifts are partnership distributions from both families. Further, there are no other writings documenting that this was an equal distribution between Hamed and Yusuf. This was solely a Yusuf withdrawal. Moreover, in the Hoda Hamed divorce proceedings she describes these as her father's or her property for these same reasons.

Additionally, Fathi Yusuf withdrew an additional \$1 million for himself at the same time the \$3 million in gifts was drawn. Mr. Yusuf kept that money for his own purposes and there was no corresponding \$1 million withdrawal for Hamed. See, HAMD248055-HAMD248057.pdf, HAMD200057-HAMD200057.

Tables 2A-4A, 5A-5B – Hamed objects to Tables 2A-4A, 5A-5B. These tables are irrelevant because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 2A-4A, 5A-5B occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these tables, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Tables 4A-5B—Hamed objects to Tables 4A-5B, which form the underlying basis for the lifestyle analysis. The "lifestyle analysis" these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Id. at *24 (emphasis added). Further, all of the Yusuf deposits and charges to credit cards were not accounted for in the BDO report, making the comparisons between the two families' spending inaccurate.⁴ Finally, many of the deposits in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Table 6—Hamed objects to Table 6 for all of the reasons given for Tables 1-5.

ROG 8. Do you contest any allocation to Waleed set forth in Tables 7A-14 for transactions after September 17, 2006, attached hereto as Exhibit 2, and, if so, which ones are contested and why?

Hamed Response: As a general matter, the BDO tables in Exhibit 2 are incorrect, are based on incomplete data, and are – by the admission of Yusuf's own experts – inaccurate and incomplete. See p. 2 and 22 of the BDO Report (emphasis added).

[At 2] records were prepared in an informal manner.

[At 22] Our report and the findings included herein have been impacted by the **limitation of the information available** in the Case. Following is a summary of the limitations we encountered during the performance of the engagement.

* * * *

Accounting records and/or documents (checks registers, bank reconciliations, deposits and disbursements of Supermarkets' accounts) provided in connection with Supermarkets were limited to covering the period from 2002 through 2004, East and West from 2006 through 2012, and Tutu Park from 2009 through 2012.

Accounting records and/or documents provided to us for the periods prior to 2003 are incomplete and limited to bank statements, deposit slips, cancelled checks, check registers, investments and broker statements, cash withdrawal tickets/receipts and cash withdrawal receipt listings. **For example, the retention policy for statements, checks, deposits, credits in Banco Popular de Puerto Rico is seven years; therefore, there is no Bank information available prior to 2007** and electronic transactions do not generate any physical evidence as to regular deposits and/or debits.

⁴ BDO reported, for example, that Fathi, Maher and Yusuf Yusuf had no spending on credit cards from January 1994 through December 2012 and Nejeah Yusuf only had \$100 in spending during the same time period.

Information discovered about the case up to August 31, 2014. We only considered information up to December 31, 2012. Transactions after that date were adjusted in our report.

Any monies identified through our analysis in excess of the amount identified from the known sources of income (e.g. salaries, rent income, etc.) **were assumed** to be partnership withdrawals/distributions. With regards to the Hamed family,

The lifestyle analysis is supported by **available information** related to deposits to banks and brokerage accounts and payments to credit cards during the period from January 1994 to December 2012 or until Gaffney was assigned to work with the Supermarkets accounting.

Second, Judge Brady also found the reports lacking in terms of comprehensiveness and he also rejected BDO's purported "lifestyle" analysis. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24 (emphasis added).

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts

Finally, Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017).

Subject to those objections, Hamed states the following:

Tables 7A-9B – Hamed objects to Tables 7A-9B. These tables are irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 7A-9B occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Table 10A – Hamed objects to Table 10A as these are attorneys' fees and associated expenses incurred in the joint defense of the criminal case, *United States of America vs. United Corp. et. al.*, in the District Court of the Virgin Islands (St. Thomas Division), Docket No. 1:05-cr-00015. These expenses were not split or attributed to any individual defendant, "rather all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case," according to the affidavit of Gordon C. Rhea:

I, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

1. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:

FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed
WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION

4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.
6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.
7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.
8. Under the Joint Defense Agreement;
 - a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.

b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.

c. Simply because a bill was 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 place.

d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.

e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account.

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf)

Further evidence of this is shown in letters Randall Andreozzi, Esq., wrote on behalf of the United Corporation in 2012-2009 to the federal government, requesting Partnership funds be released on United's behalf. An attorney solely representing Waleed Hamed would not be making requests to the federal government in a criminal case on behalf of the United Corporation and its shareholders. Yusuf's argument that Attorney Andreozzi solely represented Waleed Hamed during the time of the joint defense agreement is absurd.⁵ See, e.g., HAMD562177-HAMD562179.pdf, HAMD562183-

⁵ First, 10A is incomprehensible. What BDO appears to have done on 10A, is target bills from specific attorneys such as Pam Colon or other similar professionals. Thus, in bulk, Colon's bills were excepted. No reference is made to what work she actually did or for whom from any documentation. Beyond the obvious refutation of this by the supplied declaration and the underlying Joint Defense Agreement, Hamed notes that no support is provided in the invoices of such lawyers as to either the work done or for which party it was done.

Thus, the completely unsupported and fanciful "assumption" by BDO as to what work Ms. Colon did, for example, underlines the failure of Table 10A. To put this another way, this is not an accounting, it is a "BDO accepts the completely unsupported statement of Fathi Yusuf, in the total absence of underlying documentation, as to who did what – and we might as well have claimed absolutely ANY amount and simply said 'because

HAMD562185.pdf, HAMD261888-HAMD261892.pdf, HAMD562180-HAMD562182.pdf,
HAMD562174-HAMD562176.pdf, HAMD562159-HAMD562166.pdf and HAMD562157-
HAMD562158.pdf.

Tables 10B – Hamed does not contest this table, as it appears that BDO excepted these amounts from the calculations.

Table 11A – Hamed objects to Table 11A. This table is irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 11A occurred prior to September 17, 2006 and thus are not proper claims under the Order. Further, Table 11A demonstrates the incompleteness of the BDO report. For example, BDO's note 2 on Table 11A states "[a]mounts were transferred to Cairo Amman Bank account #250117187800 (account not included on our scope)." Thus, note 2 shows that BDO did not do a true accounting because not all accounts were included and, according to the body of the BDO report, not all records were available. See p. 2 and 22 of the BDO Report. Put another way, Fathi Yusuf could have taken tens of millions through the Cairo Amman Bank account #250117187800, and

Fathi said so'." Again, this is not an attempt to provide an accounting via underlying documents, it is an attempt to make a position look like an accounting by dropping in a bunch of numbers based on what Fathi Yusuf "told" BDO, and then having BDO sign.

it would not show up here. That is not an accounting, it is a one-sided speculative argument.

Table 11B – Hamed does not contest this table, as it appears that BDO excepted these amounts from the calculations. Hamed does not, however, agree with Note 1: “All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney.”

During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Tables 12A-13C – Hamed objects to Tables 12A-13C, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Also, all of the Yusuf deposits and charges to credit cards were not accounted for in the BDO report, making

the comparisons between the two families' spending inaccurate.⁶ Finally, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Table 14 – Hamed objects to Table 14 for all of the reasons given for Tables 7A-13C, plus the following: The headings on Table 14 make it difficult to determine which items occurred on or after Judge Brady's September 17, 2006 date for permissible claims. For instance, Table 14 shows "Funds Withdrawn through Partnership Checks" to be \$232,670.00 (BDO Table 7B). All of those withdrawals were prior to 2004, thus none of those withdrawals are applicable to the current claims process. Additionally, Table 14 shows "Withdrawals from the Partnership with a Signed Ticket/Receipt" to be \$273,630.00. All of those withdrawals were prior to 2003 (BDO Table 8B), thus none of those withdrawals are applicable to the current claims process. This amount, presumably in error, was carried over to BDO's revised Table J-2, which Hamed also disputes. Similarly, Table 14 shows "Payments to Third Parties on behalf of Hamed/Yusuf with Partnership Funds Either with Tickets or Checks" to be \$4,130.00. All of those withdrawals were prior to 2003 (BDO Table 9B), thus none of those withdrawals are applicable to the current claims process. This amount somehow jumped from \$4,130.00 to \$20,311.00 on BDO's revised Table J-2, which Hamed also disputes.

Finally, Table 14 shows "Amount Owed by Hamed Family to Yusuf as per Agreement Before Raid Sept. 2001. As per Mike's Testimony these Tickets were Burned (Refer to Letter dated August 15, 2012)" to be \$1,778,103.00. This amount is disputed

⁶ BDO reported, for example, that Fathi, Maher and Yusuf Yusuf had no spending on credit cards from January 1994 through December 2012 and Nejeh Yusuf only had \$100 in spending during the same time period.

and Hamed is unclear where BDO's came up with an amount of \$1,778,103.00. The amount in the letter refers to "Past Confirmed Withdrawals" as \$1,600,000.00, and that is the amount referenced below. See, HAMD200104-HAMD200104.pdf. In any event, Hamed does not owe the \$1.6 or \$1.77 million.

Hamed stated in Plaintiff's Response to Defendant United's First Set of Interrogatories to Plaintiff Hamed, December 23, 2013, *Hamed v Yusuf*, 12-SX-CV-370, as follows:

Describe in detail what objections you have to the accounting provided to you by Fathi Yusuf regarding the \$2.7 million dollars amount that was withdrawn by United Corporation in August of 2013 as an offset to your previous withdrawals and identify all persons with knowledge of any such facts and all documents which support your answer to this interrogatory.

Hamed Response: There are multiple problems with this accounting, which was recently supplied to my lawyers after repeated requests that it be provided. While this investigation and review continues, which will be the subject of an expert accounting report, several problems have already been noted.

First, it states that \$1.6 million was due and owing at the time of the removal of the \$2.7 million. That claim is time barred. Moreover, while it is true that in 1999 Mafi Hamed and Maher Yusuf met and reconciled the outstanding chits related to 50/50 distribution of the Sion Farm grocery store profits, showing \$1.6 million was due to the Yusufs to "true up" the differences in the 50/50 profit withdrawals at that time for that store, **there are other off-sets to that amount. For example, there were amounts to "true up" from the other stores as well.** Likewise, after that time, Fathi Yusuf and his sons took funds that were required to be offset against that amount, as he well knows. . . .(Emphasis added.)

What Mohammad Hamed stated, at page 102-103 of his 3/31-4/1, **2014** deposition was:

In.9 Q. (Mr. Hodges) And as I understand it, as of today,
In.10 you -- you are still not aware of the facts and
In.11 circumstances surrounding the \$1.6 million that's referenced
In.12 in Exhibit No. 3, is that right?
In.13 MR. HARTMANN: Object. Asked and answered.
In.14 MR. HODGES: Show him the letter while
In.15 you're --
In.16 THE INTERPRETER: This one?
In.17 MR. HODGES: No, the 1.6.

In.18 THE INTERPRETER: Right.
In.19 MR. HODGES: You want me to ask the question
In.20 again?
In.21 THE INTERPRETER: Please.
* * *

In.3 Q. (Mr. Hodges) Okay. If you would point out the
In.4 1.6 million on Exhibit 3? And the -- the words to the
In.5 left -- left of it, Past confirmed withdrawal?
In.6 **Okay. So, Mr. Hamed, as -- as you're sitting**
In.7 **here today, you are not aware of any of the facts**
In.8 **surrounding the, quote, Past confirmed withdrawals of**
In.9 **\$1.6 million, is that correct?**

In.10 MR. HARTMANN: Object. Asked and answered.
In.11 THE INTERPRETER: Okay.
In.12 **He says no.**
In.13 MR. HODGES: Okay. I guess that's a good
In.14 time to break, then. (Emphasis added.)

This was just one small part of the relationship between the parties that was partially accounted at one time, and thus was incomplete. Mike Yusuf testified that Plaza Extra - East receipts were tallied between the Hameds and the Yusufs, showing that Hameds had taken out approximately \$1.6 million more than the Yusufs prior to the 2001 FBI raid. However, Mike Yusuf also testified that the reconciliation did not include St. Thomas and it did not include all of the Plaza Extra-East receipts. See, 30(b)(6) Deposition of United Corporation through its representative, Mike Yusuf, *Hamed v Yusuf*, SX-12-CV-370, April 3, 2014, pp. 64-68. The \$1.6 million was just one facet of various claims between the Yusufs (not United) and the Hameds at that time. **To get what was "owed" as an effect of ALL ACCOUNTS at that time, one would have to know the similar amounts from the other operations at the same time.**

Thus, Hamed objects to this amount because 1) it is outside of the applicable timeframe for claims and 2) it is clear that a full accounting prior to the FBI raid was not done, thus making the \$1.6 million one data point in the various claims between the Partners.

ROG 9. Do you contest any allocation to Waheed set forth in Tables 15A-22 for transactions after September 17, 2006, attached hereto as Exhibit 3, and, if so, which ones are contested and why?

Hamed Response: Yes. As a general matter, the BDO tables in Exhibit 3 are incorrect, are based on incomplete data, and are – by the admission of Yusuf's own experts – inaccurate and incomplete. See p. 2 and 22 of the BDO Report (emphasis added).

[At 2] records were prepared in an **informal manner**.

[At 22] Our report and the findings included herein have been impacted by the **limitation of the information available** in the Case. Following is a summary of the limitations we encountered during the performance of the engagement.

* * * *

Accounting records and/or documents (checks registers, bank reconciliations, deposits and disbursements of Supermarkets' accounts) provided in connection with Supermarkets were limited to covering the period from 2002 through 2004, East and West from 2006 through 2012, and Tutu Park from 2009 through 2012.

Accounting records and/or documents provided to us for the periods prior to 2003 are incomplete and limited to bank statements, deposit slips, cancelled checks, check registers, investments and broker statements, cash withdrawal tickets/receipts and cash withdrawal receipt listings. **For example, the retention policy for statements, checks, deposits, credits in Banco Popular de Puerto Rico is seven years; therefore, there is no Bank information available prior to 2007** and electronic transactions do not generate any physical evidence as to regular deposits and/or debits.

Information discovered about the case up to August 31, 2014. We only considered information up to December 31, 2012. Transactions after that date were adjusted in our report.

Any monies identified through our analysis in excess of the amount identified from the known sources of income (e.g. salaries, rent income, etc.) **were assumed** to be partnership withdrawals/distributions. With regards to the Hamed family,

The lifestyle analysis is supported by **available information** related to deposits to banks and brokerage accounts and payments to credit cards during the period from January 1994 to December 2012 or until Gaffney was assigned to work with the Supermarkets accounting.

Second, Judge Brady also found the reports lacking in terms of comprehensiveness and he also rejected BDO's purported "lifestyle" analysis. See Brady

decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24 (emphasis added).

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts

Finally, Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017).

Subject to those objections, Hamed states the following:

Tables 15A-17B, 20A, 21A-21B – Hamed objects to Tables 15A-17B, 20A, 21A-21B.

These tables are irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 15A-17B, 20A, 21A-21B occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Table 18 – Hamed objects to Table 18 as these are attorneys' fees and associated expenses incurred in the joint defense of the criminal case, *United States of America vs. United Corp. et. al.*, in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015. These expenses were not split or attributed to any individual defendant, rather all bills were to be paid out of a Plaza Extra bank account, according to the affidavit of Gordon C. Rhea:

- 1, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:
2. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:
FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed

WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION

4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.
6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.
7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.
8. Under the Joint Defense Agreement;
 - a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.
 - b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.
 - c. Simply because a bill was 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 place.
 - d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.
 - e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account,

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf).⁷

⁷ First, Table 18 is incomprehensible. What BDO appears to have done on 18, is target bills from specific attorneys such as Pam Colon or other similar professionals. Thus, in bulk, Colon's bills were excepted. No reference is made to what work she actually did or

Further evidence of this is shown in letters Randall Andreozzi, Esq., wrote on behalf of the United Corporation in 2012-2009 to the federal government, requesting Partnership funds be released on United's behalf. An attorney solely representing Waleed Hamed would not be making requests to the federal government in a criminal case on behalf of the United Corporation and its shareholders. Yusuf's argument that Attorney Andreozzi solely represented Waleed Hamed during the time of the joint defense agreement is absurd. See, e.g., HAMD562177-HAMD562179.pdf, HAMD562183-HAMD562185.pdf, HAMD261888-HAMD261892.pdf, HAMD562180-HAMD562182.pdf, HAMD562174-HAMD562176.pdf, HAMD562159-HAMD562166.pdf and HAMD562157-HAMD562158.pdf.

Table 19 – Hamed does not contest this table, as it appears that BDO excepted these amounts from the calculations.

Tables 20A-21C – Hamed objects to Tables 20A-21C, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt

for whom from any documentation. Beyond the obvious refutation of this by the supplied declaration and the underlying Joint Defense Agreement, Hamed notes that no support is provided in the invoices of such lawyers as to either the work done or for which party it was done.

Thus, the completely unsupported and fanciful “assumption” by BDO as to what work Ms. Colon did, for example, underlines the failure of Table 10A. To put this another way, this is not an accounting, it is a “BDO accepts the completely unsupported statement of Fathi Yusuf, in the total absence of underlying documentation, as to who did what – and we might as well have claimed absolutely ANY amount and simply said ‘because Fathi said so.’” Again, this is not an attempt to provide an accounting via underlying documents, it is an attempt to make a position look like an accounting by dropping in a bunch of numbers based on what Fathi Yusuf “told” BDO, and then having BDO sign.

to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Also, all of the Yusuf deposits and charges to credit cards were not accounted for in the BDO report, making the comparisons between the two families' spending inaccurate.⁸ Further, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Finally, Hamed does not agree with Tickmark A on Table 21C: "All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney." During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Table 22 – Hamed objects to Table 22 for all of the reasons given for Tables 15A-21C, plus the following: The headings on Table 22 make it difficult to determine which items occurred on or after Judge Brady's September 17, 2006 date for permissible claims. For

⁸ BDO reported, for example, that Fathi, Maher and Yusuf Yusuf had no spending on credit cards from January 1994 through December 2012 and Nejeh Yusuf only had \$100 in spending during the same time period.

instance, Table 22 shows "Funds Withdrawn through Partnership Checks" to be \$72,400.44 (BDO Tables 15A-B). All of those withdrawals were prior to 2005, thus none of those withdrawals are applicable to the current claims process. Additionally, Table 22 shows "Withdrawals from the Partnership with a Signed Ticket/Receipt" to be \$1,307,622.00. All of those withdrawals were prior to 2002 (BDO Tables 16A-16B), therefore none of those withdrawals are applicable to the current claims process. Finally, Table 22 shows "Payments to Third Parties on behalf of Hamed/Yusuf with Partnership Funds Either with Tickets or Checks" to be \$528,998.81. All of those withdrawals were prior to 2003 (BDO Table 17A-17B), thus none of those withdrawals are applicable to the current claims process.

ROG 10. Do you contest any allocation to Mufeed set forth in Tables 23A-28 for transactions after September 17, 2006, attached hereto as Exhibit 4, and, if so, which ones are contested and why?

Hamed Response: Yes. As a general matter, the BDO tables in Exhibit 4 are incorrect, are based on incomplete data, and are – by the admission of Yusuf's own experts – inaccurate and incomplete. See p. 2 and 22 of the BDO Report (emphasis added).

[At 2] records were prepared in an **informal manner**.

[At 22] Our report and the findings included herein have been impacted by the **limitation of the information available** in the Case. Following is a summary of the limitations we encountered during the performance of the engagement.

* * * *

Accounting records and/or documents (checks registers, bank reconciliations, deposits and disbursements of Supermarkets' accounts) provided in connection with Supermarkets were limited to covering the period from 2002 through 2004, East and West from 2006 through 2012, and Tutu Park from 2009 through 2012.

Accounting records and/or documents provided to us for the periods prior to 2003 are incomplete and limited to bank statements, deposit slips, cancelled checks, check registers, investments and broker statements, cash withdrawal tickets/receipts and cash withdrawal receipt listings. **For**

example, the retention policy for statements, checks, deposits, credits in Banco Popular de Puerto Rico is seven years; therefore, there is no Bank information available prior to 2007 and electronic transactions do not generate any physical evidence as to regular deposits and/or debits. Information discovered about the case up to August 31, 2014. We only considered information up to December 31, 2012. Transactions after that date were adjusted in our report.

Any monies identified through our analysis in excess of the amount identified from the known sources of income (e.g. salaries, rent income, etc.) **were assumed** to be partnership withdrawals/distributions. With regards to the Hamed family,

The lifestyle analysis is supported by **available information** related to deposits to banks and brokerage accounts and payments to credit cards during the period from January 1994 to December 2012 or until Gaffney was assigned to work with the Supermarkets accounting.

Second, Judge Brady also found the reports lacking in terms of comprehensiveness and he also rejected BDO's purported "lifestyle" analysis. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24 (emphasis added).

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts

Finally, Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017).

Subject to those objections, Hamed states the following:

Tables 23A-26A, 27A – Hamed objects to Tables 23A-26A, 27A. These tables are irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 23A-26A, 27A occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for

documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Tables 26A-27C – Hamed objects to Tables 26A-27C, which form the underlying basis for the lifestyle analysis. The “lifestyle analysis” these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of “known sources of income” constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own “expert report” acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Further, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Finally, Hamed does not agree with Tickmark A on Tables 26C and 27C: “All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney.” During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Table 28 – Hamed objects to Table 28 for all of the reasons given for Tables 23A-27C.

ROG 11. Do you contest any allocation to Hisham set forth in Tables 29A-34 for transactions after September 17, 2006, attached hereto as Exhibit 5, and, if so, which ones are contested and why?

Hamed Response: Yes. As a general matter, the BDO tables in Exhibit 4 are incorrect, are based on incomplete data, and are – by the admission of Yusuf's own experts – inaccurate and incomplete. See p. 2 and 22 of the BDO Report (emphasis added).

[At 2] records were prepared in an informal manner.

[At 22] Our report and the findings included herein have been impacted by the **limitation of the information available** in the Case. Following is a summary of the limitations we encountered during the performance of the engagement.

* * * *

Accounting records and/or documents (checks registers, bank reconciliations, deposits and disbursements of Supermarkets' accounts) provided in connection with Supermarkets were limited to covering the period from 2002 through 2004, East and West from 2006 through 2012, and Tutu Park from 2009 through 2012.

Accounting records and/or documents provided to us for the periods prior to 2003 are incomplete and limited to bank statements, deposit slips, cancelled checks, check registers, investments and broker statements, cash withdrawal tickets/receipts and cash withdrawal receipt listings. **For example, the retention policy for statements, checks, deposits, credits in Banco Popular de Puerto Rico is seven years; therefore, there is no Bank information available prior to 2007** and electronic transactions do not generate any physical evidence as to regular deposits and/or debits. Information discovered about the case up to August 31, 2014. We only considered information up to December 31, 2012. Transactions after that date were adjusted in our report.

Any monies identified through our analysis in excess of the amount identified from the known sources of income (e.g. salaries, rent income, etc.) **were assumed** to be partnership withdrawals/distributions. With regards to the Hamed family,

The lifestyle analysis is supported by **available information** related to deposits to banks and brokerage accounts and payments to credit cards during the period from January 1994 to December 2012 or until Gaffney was assigned to work with the Supermarkets accounting.

Second, Judge Brady also found the reports lacking in terms of comprehensiveness and he also rejected BDO's purported "lifestyle" analysis. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017, at pp. 23-24 (emphasis added).

As part of the accounting and distribution phase of the Wind Up, Yusuf submitted to the Master the report of accountant Fernando Scherrer of the accounting firm BDO, Puerto Rico, P.S.C. (BDO Report). Yusuf contends that this report constitutes a comprehensive accounting of the historical partner withdrawals and reconciliation for the time period 1994-2012." See Opposition to Motion to Strike BDO Report, filed October 20, 2016. However, the BDO report, by its own terms, appears to be anything but comprehensive. Most tellingly, the body of the BDO Report itself contains a section detailing its own substantial "limitations," resulting from the absence or inadequacy of records for each of the grocery stores covering various periods during the life of the partnership.²⁵ See Plaintiff's Motion to Strike BDO Rep't, Exhibit 1, at 22.

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners'§ 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt to accurately reconstruct the partnership accounts

Finally, Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017).

Subject to those objections, Hamed states the following:

Tables 29A-31A, 32A – Hamed objects to Tables 29A-31A, 32A. These tables are irrelevant date because Judge Brady's July 24, 2017 Order limits claims to transactions that occurred on or after September 17, 2006:

ORDERED that the accounting in this matter, to which each partner is entitled under 26 V.I.C § 177(b), conducted pursuant to the Final Wind Up Plan adopted by the Court, shall be limited in scope to consider only those claimed credits and charges to partner accounts, within the meaning of 26 V.I.C § 71(a), based upon transactions that occurred on or after September 17, 2006.

Hamed v. Yusuf, Civ. No. SX-12-CV-370, 2017 WL 3168458, at *29 (V.I.Super. July 21, 2017). All of the dates on Tables 29A-31A occurred prior to September 17, 2006 and thus are not proper claims under the Order.

Hamed has not evaluated each allocation individually to identify errors because the timeframe covered by the tables is outside of the scope as articulated in Judge Brady's July 21, 2017 Order. For a sampling of disputes Hamed has regarding these exhibits, please see the testimony and exhibits from the March 6, 2017 hearing before Judge Brady. Further, see generally, the documents the FBI seized in its 2001 raid for documents contradicting BDO's tables, which were produced by Yusuf to Hamed on August 26, 2013.

Tables 31B-31C – Hamed does not contest Tables 31B-31C, as it appears that BDO excepted these amounts from the calculations.

Tables 32A-33 – Hamed objects to Tables 32A-33, which form the underlying basis for the lifestyle analysis. The "lifestyle analysis" these tables underpin have already been discredited in Judge Brady's July 21, 2017 Order:

Additionally, **the analysis presented in the report rests on the unsupported assumption that any monies identified in excess of "known sources of income" constitute distributions from partnership funds to the partners' § 71(a) accounts.** Thus, even Yusuf's own "expert report" acknowledges the insurmountable difficulties inherent in any attempt

to accurately reconstruct the partnership accounts; a project which necessarily becomes proportionately more difficult and less reliable the farther back in time one goes.

Hamed v. Yusuf, 2017 WL 3168458, at *24 (emphasis added). Further, Hamed's income earned from sources other than his salary from the Partnership was not included, plus many of the bank account deposits and payments to credit cards in these tables occurred prior to September 17, 2006, also rendering them moot under the Judge's Order.

Finally, Hamed does not agree with Tickmark A on Table 32C: "All transactions that occur during the period while Gaffney was in charge of the accounting were adjusted to avoid duplicity because all withdrawals were supposed to be accounted for by Gaffney." During a portion of 2013, the Hameds were locked out of the Partnership's financials—both paper and electronic access to bank records – and were subsequently told by Mr. Gaffney that all bank statements for the Partnership during that time period were not available for their review because paper statements for some of the accounts did not exist. Accordingly, Hamed cannot assert that all Yusuf withdrawals were properly accounted for by Mr. Gaffney, demonstrating another reason why BDO's Exhibit J-2 to Yusuf's October 30, 2017 revised amended claims submission regarding the amount BDO claims Hamed owes Yusuf is inaccurate.

Table 34 – Hamed objects to Table 34 for all of the reasons given for Tables 29A-33.

ROG 12. What expenses, if any, do you contend must be paid by the Partnership before any distribution of the profits can be made?

Hamed Response: Object. It is unclear as to what is meant by "expenses." Subject to that objection: If this means claims, then all of the 165 claims Hamed has submitted. If it means on-going administrative expenses, the costs of the Special Master, his clerk, his costs as set forth in his invoices, the CaseAnywhere charges and whatever proper

expenses the court or the Master orders to be paid. Hamed does not agree to any "prospective" amounts that Yusuf has ESTIMATED might be due. As for amounts listed as expenses by Mr. Gaffney's accounting, Hamed has not been able to examine Mr. Gaffney and will respond thereafter by supplementation.

ROG 13. Did each of the Hamed family members originally disclose on their tax returns from 1986 through the time of the plea agreement in the Criminal Case, all the income they received from the Partnership operation of the grocery store business?

Hamed Response: No.

ROG 14. Identify all assets that were transferred to the Mohammad Hamed Revocable Trust and what was the value of said assets upon transfer?

Hamed Response: Object. This interrogatory attempts to invade the Trust. Yusuf brought a separate action regarding the Trust (which has recently been consolidated with this case) – despite the fact that there has been no judgment yet for any amounts for Hamed here. Moreover, there are more than sufficient assets in the real estate holding of the Trust, which have not changed since the Trust was funded, to pay any potential judgment. Thus, all such inquiries are premature here. Subject to this objection, see response to Interrogatory 15.

ROG 15. What assets were held by the Mohammad Hamed Revocable Trust as of the date of death of Mohammad Hamed?

Hamed Response: Object. All of the assets set forth in the Trust Agreement are listed on the Trust Agreement -- which has been provided. This interrogatory attempts to invade the Trust. There are more than sufficient assets in the real estate holding of the Trust, which have not changed since the Trust was funded, to pay any potential judgment. Thus, all such inquiries are premature here.

Subject to this objection, Waleed Hamed states:

1. Into the Trust, Mohammad Hamed placed assets, some of which are listed below, in 2012 -- which assets all remain in the Trust, unpledged and unencumbered in any manner:
 - a. 10% of the shares (10 shares) of Plessen Enterprises, Inc.
 - b. 10% of the shares (10 shares) of Sixteen Plus.⁹
 - c. 50% of the shares (500 shares) of Peters Farm.¹⁰
 - d. His personal residence in which Mrs. Hamed is residing.
 - e. Small holdings of land worth less than \$250,000.
2. The value of these above-listed assets is approximately \$9,600,000, calculated as:
 - a. Mohammad Hamed's residence, \$300,000
 - b. Miscellaneous unimproved land in his name, \$200,000
 - c. Stock in Plessen (10 shares = 10%), estimated \$ 2,000,000¹¹
(estimated \$20 million value: rent from Plaza West store + other property + \$1.6 million plus in cash)
 - d. Stock in Sixteen Plus (10 shares - 10%), estimated \$1,600,000
(estimated \$16 million land Diamond Keturah)

⁹ The balance of the shares is owned by other Hamed Family Members and Yusuf Family Members. The underlying property cannot be sold or encumbered without the agreement of the Yusufs.

¹⁰ The balance of the shares is owned by other Hamed Family Members and Yusuf Family Members. The underlying property cannot be sold or encumbered without the agreement of the Yusufs.

¹¹ In addition to the \$1.6 million plus Plessen has in the bank, it takes in more than \$100,000 per month. Out of this, Plessen only pays taxes and other minor amounts -- it has no significant expenses.

e. Stock in Peter's Farm (500 shares = 50%), estimated \$5,500,000

(4 properties)

3. In addition, there are Mohammad Hamed's claims pending in the action *Hamed v. Yusuf and United*, SX-12-CV-370¹² against Fathi Yusuf and United Corporation as follows:

a. One-half of the original \$2.7 million that Judge Brady found that the Yusuf's had stolen from the Partnership,¹³ (See the Court's detailed Memorandum of April 25, 2013, *Hamed v. Yusuf*, 58 V.I. 117, 2013 WL 1846506 (V.I. Super. Apr. 25, 2013)).

¹² This litigation began in 2012 when Fathi and Mike Yusuf unilaterally took \$2,784,706.25 from a Partnership account and transferred it to an account to which the Hameds did not have access. This was the main issue in Hamed's 2012 complaint and the central issue during the early portion of this case. Yusuf took the position that Hamed had no interest in the Plaza Extra Stores. Based on this, he took \$2.7 million from the Partnership account and also tried to have the police remove the Hameds from the stores. Thus, Judge Brady granted a full evidentiary TRO hearing over two full days -- January 25th and 31st, 2013. Three months later, the Court ruled for Hamed on the matter. (See the Court's detailed Memorandum of April 25, 2013, *Hamed v. Yusuf*, 58 V.I. 117, 2013 WL 1846506 (V.I. Super. Apr. 25, 2013)). The Court stated at paragraphs 35 and 36:

On the first hearing day, Mahar Yusuf, President of United. Corporation testified under oath that he used the \$2,784,706.25 withdrawn from the Plaza Extra operating account to buy three properties on St. Croix in the name of United. On the second hearing day, Mahar Yusuf, contradicted his prior testimony and admitted that those withdrawn funds had actually been used to invest in businesses not owned by United. . . . Id. at *10.

And, further, at footnote 9, at *19:

With regard to the August 2012 diversion of more than \$2.7 million by Mahar Yusuf, president of United, to accounts inaccessible to Plaintiff, a real concern exists that continuing diversions will not be traceable as the Plaza Extra store have had no system of internal controls in existence and, to date accounting for the businesses is not completed beyond June 2012....

¹³ This asset is within the control of the Court here and cannot be realized before that action is decided.

- b. More than \$500,000 dollars Judge Brady found had been wrongfully taken from Partnership accounts to pay for Yusuf's personal lawyer.¹⁴ See Court's detailed Memorandum of April 25, 2013.
- c. One-half of \$8 million in cash, presently escrowed in a Court-supervised account, which Hamed's share may increase based on the on-going accounting.¹⁵
- d. Two parcels of land in United's name paid for with Partnership funds and transferred to United without any consideration.¹⁶
- e. One-half of more than \$26 million in "new" claims listed in a 2016 Expert Report as having been improperly paid or accounted for by Yusuf and United when they controlled accounts from 2012-present.¹⁷ It is also important to note that if EVERY remaining Yusuf Claim were granted against Hamed and none of the other counter-defendants (new claims are no longer allowed), and every one of the Hamed claims for \$26 million were denied, Yusuf's total remaining potential claims are still less than the value of just the enumerated Hamed assets in Trust plus half of Hamed's remaining \$4 million in escrow.

¹⁴ This asset is within the control of the Court in this action (consolidated) and cannot be realized before the action is decided.

¹⁵ This asset is within the control of the Court in 370 and cannot be realized before that action is decided.

¹⁶ This asset is within the control of the Court in 370 and cannot be realized before that action is decided.

¹⁷ This asset is within the control of the Court in 370 and cannot be realized before that action is decided.

ALL REMAINING YUSUF CLAIMS

New Claim Number	Item No. in Original 9/30/2017 Claim Filing	Description	Total Amount of Claim, According to Yusuf
Y-01	Exhibit C	Unpaid rent for Plaza Extra-East Bay 1	DENIED – J. Ross
Y-02	Y's Claims - III.B.2	Unpaid rent for Plaza Extra-East Bays 5 & 8	\$793,984.34
Y-03	Exhibit D	9% interest on rent claims for Bay 1	DENIED – J. Ross
Y-04	Exhibit E	9% interest on rent claims for Bays 5 & 8	\$241,005.18
Y-05	Exhibit F	Reimburse United for Gross Receipt Taxes	\$60,586.96
Y-06	Exhibit G	Black Book Balance Owed United	\$49,997.00
Y-07	Exhibit H	Ledger Balance Owed United	\$199,760.00
Y-08	Y's Claims - III.F	Water Revenue Owed United	\$693,207.46
Y-09	Exhibit I	Unreimbursed Transfers from United	\$188,132.00
Y-10	New	Past Partnership Withdrawals - Receipts	\$3,133,020.88
Y-11	BDO Table	Lifestyle Analysis	DENIED- J. Brady
Y-12	Y's Claims - VI, Exhibits K-O	Foreign Accts and Jordanian Properties	Extra-Jurisdictional
Y-13	Y's Claims - VII, Exhibit P	Loss of going concern value of Plaza West- Integra	\$4,385,000.00
Y-14	Y's Claims - VIII	Half of the value of the six containers	\$210,000.00
Sum of All Remaining Yusuf Claims			\$9,954,693.82

4. Other than the amounts listed above associated with this action, there are no other claims against Mohammad Hamed, the Estate or the Trust.

5. In this, the amount claimed in the January 14, 2013, Amended Counterclaim plus interest -- against all defendants -- is \$7 million¹⁸ -- far less than \$9,600,000 plus the \$4,000,000 in cash in the escrow.
6. Of the remaining claims against Mohammad Hamed in that case, the most likely and significant one was by United, for back rents of \$6,974,063.10. It was soundly denied by Special Master Ross, who found, at page 6 (emphasis added):

Thus, the evidence and facts surrounding Yusuf's action through United—terminating the lease with the Partnership at Bay 1, treating the Partnership as a holdover tenant, and raising United's rent significantly higher than the agreed upon rent—demonstrates **a transaction prohibited by law and tainted by a conflict of interest and self-dealing.**

ROG 16. Identify the current assets of the Mohammad Hamed Revocable Trust and identify any transfers that have occurred since its inception.

Hamed Response: None of the assets or claims set forth in response to the preceding interrogatory have been transferred. All remain in the trust, unencumbered. With regard to the current assets of the trust, other than those described, Hamed objects on the basis of relevance.

ROG 17. Has any member of the Hamed family held assets for the benefit of Hamed 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?

Hamed Response: No.

¹⁸ At paragraph 155:

Hamed and his agents have obtained in excess of \$7 million of the Plaza Extra Stores' monies under such circumstances that in equity and good conscience they ought not retain and the Hamed Sons participated and aided and abetted in this conduct by accepting funds from the Plaza Extra Stores and, among other things, using them to purchase and improve properties for their own personal benefit.

ROG 18. Do you dispute any of the debts owed by the Partnership as set forth in the attached Exhibit 6 and if so, please explain the basis for your dispute identifying any documents or evidentiary support for your position?

Hamed Response: Yes. Exhibit 6 is Yusuf's amended accounting claims, which were filed on October 30, 2017. For purposes of this interrogatory, Hamed is referencing section "III. Outstanding Debts of the Partnership," pages 7-12 only. Each section on those pages is addressed separately, below.

Section A. Miscellaneous Debts

Hamed objects to "Section A. Miscellaneous Debts," page 8. This section asserts that \$167,114.78 must be paid by the Partnership prior to any distribution of assets. Yusuf states that as of August 31, 2017, that amount is now \$69,273.51, according to John Gaffney. It is impossible for Hamed not to object to this section, as Hamed has not received any underlying, supporting documentation to validate the accuracy of the debts.

For Hamed to make a determination regarding this section, invoices and cancelled checks for each debt need to be examined by Hamed's accountant.

Section B. Unpaid Rent for Plaza Extra East and Adjacent Bays

1. Bay 1 - Increased Rent Due Net of Rent Paid

The first debt listed under Section B has been made moot by Special Master Ross' March 15, 2018 Order regarding rent on Bay 1.

In this instance, Yusuf and Hamed are partners of the Partnership (Wind up Order ¶ 1.24). At the same time, Yusuf is also the principal shareholder of United, the landlord of the Partnership at Bay 1. Acting on behalf of United, Yusuf terminated the Partnership's lease at Bay 1, treated the Partnership as a holdover tenant, and raised the rent from \$58,791.38 to \$200,000.00 and \$250,000.00. While "[a] partner does not violate a duty or obligation under this chapter or under the partnership agreement merely because the partner's conduct furthers the partner's own interest" under Title 26 V.I.C. § 74(e), Yusuf's conduct went beyond furthering his own interest. Here, Yusuf dealt with the Partnership on behalf of a party—namely, United—having an

interest adverse to the Partnership, in violation of Title 26 V.I.C. § 74(b)(2). Additionally, Yusuf did not act consistently with the obligation of good faith and fair dealing, in violation of Title 26 V.I.C. § 74(d). Thus, the evidence and facts surrounding Yusuf's action through United—terminating the lease with the Partnership at Bay 1, treating the Partnership as a holdover tenant, and raising United's rent significantly higher than the agreed upon rent—demonstrates a transaction prohibited by law and tainted by a conflict of interest and self-dealing.

Based on the foregoing, the Master will deny United's motion for recovery of additional rent from the Partnership as holdover tenant at Bay 1.

Hamed v. Yusuf, et al.; SX-12-CV-370; SX-14-278; SX-14-287 Order, March 15, 2018, at pp. 6-7 (footnotes omitted).

2. *Bays 5 and 8*

Hamed disputes the Partnership owes United rent for Bays 5 and 8 at Plaza Extra-East. He does stipulate to the following: (1) He entered into a settlement agreement with regard to the Partnership's use of any of the premises used during such periods by the East Store. Said agreement references the use of whatever premises were used at the Sion Farm location -- and does not restrict its scope to just Bay 1. See, HAMD591991-HAMD592006.pdf and Moreover, (2) Hamed knows that Yusuf is in possession of pages from the United Accounts Receivable (labeled "A/R") ledger during that period showing (i) no rent due for the covered period and, more importantly, (ii) no "balance forward." See e.g., FBIX339272-FBIX339301. Both of these documents are documentary evidence to refute that rent is due from the Partnership to United for Bay 5 in the amount of \$271,875.00 and for Bay 8 in the amount of \$323,515.63 for the period of May 1, 1994 to September 30, 2002 and \$198,593.75 for the period of April 1, 2008 to May 30, 2013.

3. *Interest on Rent Claims*

Again, this debt has been made moot by Special Master Ross' March 15, 2018 Order regarding rent on Bay 1. Further, Hamed disputes that interest is owed on rent for

Bays 5 and 8, as there is no rent owed by the Partnership, and by extension, no interest is owed either.

Section C. Reimbursement for Gross Receipts Taxes Paid by United

Hamed disputes this debt. The Partners agreed when the Partnership was formed that all gross receipts of United *ascribable to Partnership operation, but not those of unrelated United businesses* were to be paid from the grocery store operations. As this claim relates to United's businesses unrelated to the Plaza Extra Partnership, the Partnership does not owe United \$60,586.96. Further, the time period United is claiming reimbursement for United's gross receipts is 1993-2001. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

Section D. Black Book Balance Owed United

Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated in 1993-1994. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. This claim also is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

The documentary evidence Yusuf provided is merely a couple of pages out of a so-called black book. It is impossible to say definitively that the Partnership owes this

amount to United, because all of the records of the Partnership are not available from 1992 forward. This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22.

Finally, Fathi Yusuf's brother owned part of the United Shopping Center prior to the Plaza Extra-East store burning down in 1992. Fathi Yusuf tried to steal the shopping center from his brother, but was unsuccessful. Instead, he bought out his brother's interest in the United Shopping Center using Partnership funds. Nowhere in the Black Book does United show the debt it owes to the Partnership for the use of Partnership funds to buy out Fathi Yusuf's brother, nor does it show any United payment to the Partnership for the funds taken by United to buy out Fathi Yusuf's brother's interest in the United Shopping Center. Thus, the black book excerpt showing that the Partnership allegedly owes United funds is just one data point in time, not a full accounting or reconciliation of all amounts.

Section E. Additional Ledger Balances Due to United

Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated in 1994, 1995 and 1998. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Further, the documentary evidence Yusuf provided is merely a couple of pages out of a ledger, the entire ledger was not even produced. It is impossible to say definitively that the Partnership owes this amount to United, because all of the records of the Partnership are not available from 1992 forward.

This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

Finally, Fathi Yusuf's brother owned part of the United Shopping Center prior to the Plaza Extra-East store burning down in 1992. Fathi Yusuf tried to steal the shopping center from his brother, but was unsuccessful. Instead, he bought out his brother's interest in the United Shopping Center using Partnership funds. Nowhere in the ledger balances does United show the debt it owes to the Partnership for the use of Partnership funds to buy out Fathi Yusuf's brother, nor does it show any United payment to the Partnership for the funds taken by United to buy out Fathi Yusuf's brother's interest in the United Shopping Center. Thus, the ledger balance excerpt showing that the Partnership allegedly owes United funds is just one data point in time, not a full accounting or reconciliation of all amounts.

Section F. Water Revenue Re Plaza Extra-East

Hamed disputes this debt. Yusuf contends that from April 1, 2004, all revenue from the sale of water that was collected by Plaza Extra-East was to be paid to United. The water sales actually did not belong to United, but to the Partnership.

A little background is in order. When the Partnership purchased the one-acre property at Plaza Extra-East, it also built, with Partnership funds, a 400,000 to 450,000

gallon cistern on the property. Additionally, one or two water wells also were used to fill the cistern. This was during the 1990s. At that time, there was a water shortage on island, WAPA had difficulty consistently providing water and, other than WAPA, there really weren't other companies selling water. The Partnership filled this gap by selling water, starting approximately in 1994. Yusuf is correct that during 1994-2004, the proceeds from the sale of the water went to charity (half to Mr. Yusuf's choice of charity and the other half to Mr. Hamed's choice of charity) and to pay the expenses of the water generation and delivery. At its peak, in the 1990s, 10 or more trucks a day, each with a capacity of about 30,000 gallons, delivered water to St. Croix residents.

After April 1, 2004, the funds generated from the enterprise went to the Partnership, rather than to charity. The sale of water dropped off quite dramatically for the Partnership in the 2000s. Competitors, such as Marcos and others, entered the market. To get a sense of the scope, in the 2000s, the Partnership was sending out one or two trucks a day to deliver water, rather than the previous 10 or more trucks.

Eventually, Yusuf Yusuf was in charge of monitoring the water sales. For a time, water sales were recorded on hand written receipts, but there weren't any controls to ensure that the vendors did not take more water than they were billed. Wally Hamed then recommended, and Yusuf Yusuf implemented, a key being programmed into the register at the service desk to record the sales of water.

Hamed objects to this blatant claim by Yusuf & United for a number of reasons. First, neither United nor Yusuf has provided any document memorializing this so-called agreement between the Partnership and United because one does not exist. Next, Yusuf picks two years of sales, 1997 and 1998, and extrapolates those two years of sales into an average of \$5,291.66 per month and applies that monthly figure to every month from

April 1, 2004 through February 28, 2015. As is explained by the chronology, water sales dropped off dramatically in the 2000s, so of course Yusuf picks two years of sales during the most profitable years. Third, Yusuf does not provide *any* documentation to support the sales for 1997 and 1998, nor does he provide *any* documentation to support water sales from April 1, 2004 through February 28, 2015, even though both paper copy receipts and information from the register could be generated to show actual sales. Fourth, and perhaps most galling, United doesn't have any right to the water, as it is Partnership water, so this really isn't money United is entitled. Finally, this leads to Hamed's belief that this is another example of what Special Master Ross described as "a transaction prohibited by law and tainted by a conflict of interest and self-dealing," when discussing the inflated rents United tried to collect on Bay 1. Yusuf is not fulfilling his fiduciary duty to the Partnership and instead is trying to loot the Partnership for his corporation, United.

Section G. Unreimbursed Transfers to Plaza Extra from United's Tenant Account

Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated 1996. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Further, the documentary evidence Yusuf provided merely are journal entries from United's tenant account. It is impossible to say definitively that the Partnership owes this amount to United, because all of the records of the Partnership are not available from 1993 forward. This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22. Finally, this claim is

outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

See also, Hamed's response to Yusuf's RFPD 9. Documents relating to this claim include:

- May 22, 2013 letter to Attorney Nizar DeWood from Attorney Joel Holt regarding alleged rent due to United, HAMD563377-HAMD563378.pdf.
- February 7, 2012, Rent check, HAMD592007-HAMD592007.pdf.
- Undated - Rent calculation, YUSF102523-YUSF102523.pdf.
- July and August 2001 accounts receivable, lease data and 2001 tax calculation showing Bays 5 & 8 vacant, FBIX339272-FBIX339301.pdf.

ROG 19. Identify all facts and circumstances relating to Hamed Claim No. 2 and identify, all documents relating to that claim.

Hamed Response: Claim H-2 has been fully briefed and will be determined based on those briefs, thus, no discovery remains. However, Hamed's knowledge, positions and evidence have been fully set forth in the Motion (12/20/2017) and Reply (1/17/2017) as well as in the Amended Complaint (10/19/2012) and the Proposed Findings submitted in the PI motion process (2/27/2013). See also, Hamed's response to Yusuf's RFPD 13. Subject to that:

This litigation began in 2012 when Fathi and Mike Yusuf unilaterally took \$2,784,706.25 from a partnership account and transferred it to an account to which the Hameds did not have access. This was the main issue in Hamed's 2012 complaint -- and the central issue during the early portion of this case. Because Yusuf was claiming that Hamed had no interest in the Plaza Extra Stores, unilaterally withdrawing \$2.7 million

from the partnership account and trying to have the police remove the Hameds from the stores, Judge Brady granted a full evidentiary TRO hearing which stretched to two days -- January 25th and 31st, 2013.

Three months later, the Court ruled for Hamed on the matter. (See the Court's *critical* Memorandum of April 25, 2013. *Hamed v. Yusuf*, 58 V.I. 117, 2013 WL 1846506 (V.I. Super. April 25, 2013)). The Court stated at paragraphs 35 and 36:

On the first hearing day, Mahar Yusuf, President of United. Corporation testified under oath that he used the \$2,784,706.25 withdrawn from the Plaza Extra operating account to buy three properties on St. Croix in the name of United. On the second hearing day, Mahar Yusuf, contradicted his prior testimony and admitted that those withdrawn funds had actually been used to invest in businesses not owned by United. . . . (Emphasis added.)

Id. at *10. And, further, at footnote 9, at *19:

With regard to the August 2012 diversion of more than \$2.7 million by Mahar Yusuf, president of United, to accounts inaccessible to Plaintiff, a real concern exists that continuing diversions will not be traceable as the Plaza Extra store have had no system of internal controls in existence and, to date accounting for the businesses is not completed beyond June 2012....

There is no way that Yusuf can now alter the Court's decision on this matter -- having since conceded that there was a Yusuf/Hamed partnership that owned the Plaza Extra Stores, and Judge Brady having entered summary judgment. Simply put, Yusuf tried to steal the Plaza Extra Stores, claim that Hamed was just an illiterate employee, give him a small "annuity" rather than his 50%, and throw the Hameds out -- and he began all of this by baldly stealing the \$2.7 million.

However, Yusuf (as the Liquidating Partner) has delayed having this declared a valid claim by repeatedly saying he too has claims that must be heard as well. That may be the case, and he may or may not prove those other claims, but as there is no doubt that the Yusufs took the money and (as Judge Brady's memorandum makes clear) that \$2.7 million plus interest is a valid claim and must be returned to the Partnership.

The original amount of the claim was \$2,784,706.25. Additionally, Hamed seeks \$1,305,988 in statutory interest at 9% from August 15, 2012, the date of the Plaza Extra check written to the United Corporation (unilateral Partnership withdrawal).

ROG 20. Identify all facts and circumstances relating to Hamed Claim No. 13 and identify, all documents relating to that claim.

Hamed Response: H-13 relates to Hamed's payment of taxes during criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) where the Partnership did not pay for Waleed ("Wally") and Waheed's ("Willie") 2002-2012 taxes, but the Partnership did pay for Yusuf and his children's 2002-2012 taxes. The following chronology supports Hamed's contention:

On May 24, 2013, the Virgin Islands Bureau of Internal Revenue ("VIBIR") sent a letter to Fathi Yusuf's personal attorney, Nizar DeWood, stating that "United and Related entities" owed the government \$6,586,132.00 in taxes for 2002-2012. On June 14, 2013, Maggie Doherty, US Marshal's Service, authorized the release of \$6,586,132.00 from the Partnership Banco Popular Securities account for tax payments to VIBIR (during the course of the criminal case involving United, Fathi, Maher and Yusuf Yusuf and Waleed and Waheed Hamed, the US Marshal's Service had to authorize any release of funds in excess of a certain amount from the Partnership's banking and investment accounts). The VIBIR was paid and the Hameds thought that this amount covered their parents' taxes.

On June 20, 2013, Maggie Doherty, US Marshal's Service, authorized the release of \$315,747.00 from the Partnership Banco Popular Securities account for the estimated income tax liabilities for both Waleed and Waheed Hamed (the tax liability for both men subsequently was revised to \$129,546.00 for Wally and \$3,582.00 for Willie). As was the

requirement following Judge Brady's preliminary injunction order on April 25, 2013, one Hamed and one Yusuf had to sign a check jointly from the Partnership accounts before any amount could be distributed. Fathi Yusuf refused to sign the check written to pay Wally and Willie's taxes for 2002-2012.

On June 29, 2012 [sic], Fathi Yusuf's personal attorney, Joseph DiRuzzo, claimed in a letter to Tamika M. Archer, Esq., VI Office of the Attorney General, Tamarah Parson-Small, Esq., VIBIR, and Lori Hendrickson, Esq., DOJ, that the \$6.5 million tax payment agreed to during a mediation on the subject was not to cover Mohammad Hamed or his sons:

This is a material breach of the agreement that was reached in the mediation conducted before Judge Barnard. The Parties to the mediation explicitly agreed that the \$6.5M tendered was to satisfy only the Yusuf family members' tax liabilities for the years 2002 - 2010 and not for any tax liability of Mohammad Hamed (and by extension any of the Hamed family members). We made clear that this term was non-negotiable. Everyone present agreed that Mohammed Hamed was not to be covered and under no circumstances would any portion of the \$6.5M be credited/transferred to the tax account or to satisfy any tax liability of another taxpayer (and in particular Mohammad Hamed or his family members).

See HAMD594355-HAMD594356.pdf at p. HAMD594356. Attorney DiRuzzo then threatened to recoup the \$6.5 million payment from the government unless the VIRIB confirmed that the payment applied only to Yusuf and his children's taxes:

In order to cure the breach we demand (i) that the VIRIB retract the June 20th letters issued to Mohammad Hamed (and confirm in writing its withdrawal to us) and (ii) that the VIRIB issue us a letter confirming that the \$6.5M paid was used to satisfy only the tax liabilities of the Yusuf family members (as shareholders of United Corporation, as a Subchapter S-Corp under the Internal Revenue Code) and not to satisfy any tax liability of Mohammad Hamed or any other taxpayer (including but not limited to other Hamed family members).

If the VIRIB does not cure this breach immediately we will seek to recoup the \$6.5M that was tendered as it was obtained either (i) by mutual mistake, (ii) in bad faith, or (iii) by fraud. *Id.*

On July 1, 2013, concerned that the VIBIR would lose the \$6.5 million tax payment, Claudette Watson-Anderson, CPA, VIBIR, sent a letter to Attorney DiRuzzo stating,

In response to your letter dated June 29, 2013, the Bureau hereby acknowledges that full payment of tax owed, in the amount of \$6,586,132, has been applied to the returns filed for the following taxpayers only:

Fathi & Fawzia Yusuf

Yusuf & Ala Yusuf

Zeyad Yusuf

Maher & Najat Yusuf

Nejah Yusuf

Zayed Yusuf

See HAMD594305-HAMD594305.pdf.

Also, on July 1, 2013, Lori Hendrickson, U.S. Department of Justice, confirmed that the \$6.5 million tax payment was not applicable to the Hamed family.

I am in receipt of your letter dated June 29, 2013 and the declaration of Waleed Hamed dated June 27, 2013. The statements from the declaration you quoted in your letter are not based on any representations or promises made by representatives of the Virgin Islands Bureau of Internal Revenue (VIBIR) or the United States. As we all agreed, the \$6,586,132 was applied only to members of the Yusuf family for taxes owed for 2002 through 2010. This is confirmed, as you requested, in the attached letter dated July 1, 2013 signed by the Director of the VIBIR. No one from the named family received any credit or benefit from that payment.

See, HAMD594304-HAMD594304.pdf.

On July 16, 2013, Lori Hendrickson, DOJ, confirmed to the court in the criminal tax case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) that all members of the Yusuf family who were United shareholders (including those children who did not work in the Plaza Extra stores), had their taxes paid by the

Partnership, and further, if those shareholders owed for other income unrelated to Plaza Extra, such as income from investments, then the Partnership paid those taxes too.

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20 MS. HENDRICKSON: Yes, to clarify. I
21 agree with Mr. Andreozzi that during those
22 years [of the criminal case] the payments were made, based on copies
23 of the requests for payment government sought
24 and approved, and let the money be released,
25 that **it was money to pay the tax obligations of**

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1 **the Yusuf family members who were listed as**
2 **shareholders in the record of the VIBIR. And**
3 **there was other income on some of their**
4 **returns. So, if they had other investments and**
5 **things like that.** So I think that is a fair
6 representation to say United paid for other
7 taxes that the individual shareholders owed on
8 top of the flow through based on United's
9 operations.

* * *

23 So to the extent there was additional money
24 paid, and I reviewed the tax returns, I agree
25 with Mr. Andreozzi's point, but I think it has

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1 no impact on the plea agreement itself, since
2 the government's purpose was to get all the
3 income reported and the taxes paid for the
4 income of Plaza Extra. And with the payment of
5 \$6.5 million, that has occurred.

6 THE COURT: If that included other than
7 the flow through, so be it?

8 MS. HENDRICKSON: Yes.

* * *

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17 The fact that the United won't pay for the
18 Hameds, that is a separate issue. In February
19 of 2011, yes, they paid for everyone's. Now,
20 in June, July of 2013, United does not agree to
21 pay, but the Hameds, as taxpayers, are legally
22 obligated to report income and pay taxes
23 whether or not they're part of a criminal case. (Emphasis added.)
24

On December 9, 2013, Willie Hamed wrote a check for \$3,582.00 out of his personal Banco Popular account to the VIRIB for his 2002-2012 taxes. See, JVZ-000868-JVZ-001730.pdf at p. JVZ-001174.

On March 30, 2014, Wally Hamed wrote a check for \$129,546.00 out of his personal Banco Popular account to the VIRIB for his 2002-2012. See, JVZ-000868-JVZ-001730.pdf at p. JVZ-001172.

On September 28, 2016, Hamed's CPA reviewed the general ledgers from 2012 to present provided by John Gaffney for any reimbursements to Waleed and Waheed for these tax payments or payments of the taxes made by the Partnership directly to VIBIR for the same period. None were found. See, JVZ-000001-JVZ-000867.pdf at p. JVZ-000039.

Thus, Fathi Yusuf authorized the Partnership to pay the 2002-2012 taxes for himself, his wife, his three children who worked in the Plaza Extra stores and his two children who were shareholders of the United Corporation, but did *not* work for Plaza Extra. Further, Fathi Yusuf blocked the Partnership's payment of Wally and Willie Hamed's 2002-2012 taxes. Clearly, this is another instance of, as Judge Ross opined in an earlier opinion about Fathi Yusuf's actions, "a transaction prohibited by law and tainted by a conflict of interest and self-dealing."

See also, Hamed's response to Yusuf's RFPD 14. Documents relating to this claim include:

- September 30, 2016 JVZ Engagement Report and Exhibits
- Wally (Waleed) Hamed's March 30, 2014 check to VIBIR for 2002-2012 taxes in the amount of \$129,546.00, HAMD633372-HAMD633372.pdf.

- December 10, 2013 letter to Tamarah Parson-Small, Esq., VIBIR, from Randall Andreozzi, Esq., Pamela L. Colon, Esq. and Gordon Rhea regarding payment of Willie Hamed's taxes "pursuant to the terms and protocol under our Plea Agreement in *United States v. Yusuf et al.*, Docket No. 05-cr-0015," HAMD594372-HAMD594373.pdf.
- Willie (Waheed) Hamed's December 9, 2013 check to VIBIR for payment of 2002-2012 taxes in the amount of \$3,582.00, HAMD594372-HAMD594373.pdf.
- September 26, 2013 pleading in *Hamed v Yusuf*, VI Superior Court, St. Croix Division, SX-12-CV-370, Plaintiff's Reply to Defendants' Opposition to Plaintiff's Motion for Partial Summary Judgment, specifically, Exhibit E, Waleed Hamed's declaration, dated June 27, 2013, HAMD590700-HAMD590742.pdf.
- July 1, 2013 letter to Joseph DiRuzzo, Esq. from Claudette Watson-Anderson, CPA, VIBIR, confirming that the \$6,586,132 tax payment was applied to the Yusuf family only, HAMD594305-HAMD594305.pdf.
- July 1, 2013 letter to Joseph DiRuzzo, Esq. from Lori Hendrickson, Esq., DOJ, affirming, "[as] we all agreed, the \$6,586,132 was applied only to members of the Yusuf family for taxes owed for 2002 through 2010" and "[n]o one from the Hamed family received any credit or benefit from that payment," HAMD594304-HAMD594304.pdf.
- June 29, 2012 [sic] letter to Tamika M. Archer, Esq., VI Office of the Attorney General, Tamarah Parson-Small, Esq., VIBIR, and Lori Hendrickson, Esq., DOJ, from Joseph DiRuzzo, Esq., regarding \$6.5 million in tax payments applied to the Yusuf family only, HAMD594355-HAMD594356.pdf.

- June 20, 2013 email and letter to Randall Andreozzi, Esq., from Maggie Doherty, US Marshal's Service, authorizing payment from the Partnership Banco Popular Securities account in the amount of \$315,747.00 for the estimated income tax liabilities for both Waleed and Waheed Hamed, HAMD588657-HAMD588657.pdf and HAMD588847-HAMD588848.pdf.
- June 14, 2013 letter to Joseph DiRuzzo, Esq. from Maggie Doherty, US Marshal's Service, authorizing \$6,586,132.00 payment from the Partnership Banco Popular Securities account for tax payments to VIBIR, HAMD587992-HAMD587992.pdf.
- May 24, 2013 letter to Nizar DeWood, Esq., from Claudette Watson-Anderson, CPA, VIBIR, stating "United and Related entities" owed \$6,586,132.00 in taxes for 2002-2012, HAMD594303-HAMD594303.pdf.
- April 10, 2013 letter to Maggie Doherty, US Marshal's Service, from Joseph DiRuzzo, Esq. requesting the release of \$900,000 to pay for United's quarterly taxes from Partnership funds, HAMD562233-HAMD562234.pdf.
- February 21, 2013, Motion to Alter the Temporary Restraining Order for Release of Funds, *United States v United Corp.*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, HAMD591985-HAMD591990.pdf.
- January 14, 2013 letter to Maggie Doherty, US Marshal's Service, from Joseph DiRuzzo, Esq. requesting the release of \$1,000,000 to pay for United's quarterly taxes from Partnership funds, HAMD562186-HAMD562188.pdf.
- September 7, 2012 letter to Maggie Doherty, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$400,000 to pay for United's quarterly taxes from Partnership funds, HAMD562177-HAMD562179.pdf.

- April 5, 2012 letter to Maggie Doherty, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$800,000 to pay for United's quarterly taxes from Partnership funds, HAMD562183-HAMD562185.pdf.
- January 11, 2012 letter to Maggie Doherty, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$1,500,000 to pay for United's quarterly taxes from Partnership funds, HAMD562180-HAMD562182.pdf.
- September 7, 2012 letter to Maggie Doherty, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$400,000 to pay for United's quarterly taxes from Partnership funds, HAMD562177-HAMD562179.pdf.
- April 5, 2012 letter to Maggie Doherty, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$800,000 to pay for United's quarterly taxes from Partnership funds, HAMD562183-HAMD562185.pdf.
- September 2, 2011 letter to Maggie Doherty, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$700,000 to pay for United's quarterly taxes from Partnership funds, HAMD562174-HAMD562176.pdf.
- April 13, 2010 letter to Leonard Briskman, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$780,000 to pay for United's quarterly taxes from Partnership funds, HAMD562159-HAMD562166.pdf.
- October 13, 2009 letter to Leonard Briskman, US Marshal's Service, from Randall Andreozzi, Esq., requesting the release of \$780,000 to pay for United's quarterly taxes from Partnership funds, HAMD562157-HAMD562158.pdf.

ROG 21. Identify all facts and circumstances relating to Hamed Claim No. 17 and identify, all documents relating to that claim.

Hamed Response: H-17 relates to Hamed's payment of attorneys' fees and expenses during the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15). For a period of time, all of the defense attorneys worked together under a Joint Defense Agreement to represent the following: United Corporation, Fathi, Maher ("Mike"), and Negeh Yusuf and Waleed ("Wally") and Waheed ("Willie") Hamed.

One feature of the Joint Defense Agreement concerned the payment of fees. A retainer (funded by Partnership bank accounts) for attorneys' fees and expenses for all of the defendants was established at the law firm of Andreozzi, Bluestein LLP and Richardson Patrick Westbrook & Brickman, LLC, as the attorneys worked together for all of the defendants to defend the case. Replenishment and draws from the retainer were required approval of the Court. See, e.g., HAMD202558-HAMD202562.pdf, HAMD202587-HAMD202587.pdf, HAMD202691-HAMD202694.pdf, HAMD248051-HAMD248053.pdf and HAMD202721-HAMD202721.pdf.

The Joint Defense Agreement expired on September 19, 2012 when Attorney Joseph DiRuzzo was retained to represent Fathi Yusuf. Fathi Yusuf is now refusing to allow the Partnership to pay attorneys' fees and expenses for attorneys' fees for Wally and Willie Hamed that were incurred prior to September 19, 2012, which is the subject of H-17. The following chronology supports Hamed's contention:

As noted, under the Joint Defense Agreement in the criminal case, *United States v Yusuf*, attorneys' fees and expenses were not split or attributed to any individual defendant, "rather all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case," according to the March 2, 2017 declaration of Gordon C. Rhea, one of the attorneys party to the Joint Defense Agreement:

I, GORDON C. RHEA, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as follows:

3. I have personal knowledge of the facts set forth herein.
2. I am an attorney licensed to practice law in the U.S. Virgin Islands.
3. I was one of the defense lawyers in the criminal action filed by the United States of America in the District Court of the Virgin Islands (St. Thomas Division), Docket No, 1:05-cr-00015, against the following defendants:

FATHI YUSUF MOHAMAD YUSUF, aka Fathi Yusuf
WALEED MOHAMMAD HAMED, aka Wally Hamed
WAHEED MOHAMMAD HAMED, aka Willie Hamed
MAHER FATHI YUSUF, aka Mike Yusuf
NEJEH FATHI YUSUF,
ISAM YUSUF, and
UNITED CORPORATION

4. All of the defendants in that criminal case, except for Isam Yousef who was never apprehended, were represented jointly by multiple counsel, including myself, under a Joint Defense Agreement.
5. Pursuant to the Joint Defense Agreement, all defense counsel worked together on behalf of all of the represented defendants in a joint effort to defend the case.
6. A plea agreement was reached in December of 2010 . . . , with a modification made thereafter in early 2011. . . . As noted therein, the only defendant who pled guilty was United Corporation, as the charges were dismissed against all of the other represented defendants.
7. The Joint Defense Agreement then continued during the sentencing phase of the case (to primarily address the tax issues related to the Plea) until September 19, 2012, when the Joint Defense Agreement was terminated.
8. Under the Joint Defense Agreement;
 - a. All legal and accounting work was done jointly on behalf of all represented defendants in an effort to defend all of them at the same time.
 - b. Bills for attorneys' fees and expenses reflected the work of counsel done for all defendants without allocating specific items to individual defendants.
 - c. Simply because a bill was 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 place.
 - d. All defendants were all aware of this fact, as applications for payment of the bills submitted under Joint Defense Agreement had to be made to the United States Attorney, who would then have to authorize funds to pay these bills from the defendants' bank accounts which had been frozen by court order.
 - e. Until the Joint Defense Agreement was terminated all legal bills were paid from a United Plaza Extra account.

I declare under penalty of perjury that the foregoing is true and correct.

(See, Exhibit 44 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf)

On September 19, 2012, Attorney Gordon Rhea sent an email to all of the attorneys party to the Joint Defense Agreement and Attorney Joesph DiRuzzo, stating:

It is with sadness that I must announce the termination of the joint defense team that we assembled in the early stages of the Federal criminal case against United Corporation, the Yusufs, and the Hameds. Working in harmony toward a common purpose, we brought a difficult case to a remarkably successful conclusion, resulting in the dismissal of all charges against all individuals. The joint defense agreement was formed to advance the common interests of all defendants in the criminal matter; sadly, it no longer appears capable of discharging that function.

Recent events have eroded the once-harmonious relationship among our clients, who are now divided into camps that are at serious odds with one another. The Hamed and Yusuf families are engaged in a bitter civil dispute, each has retained attorneys to pursue their civil disagreements, and civil litigation is in train. United Corporation has directed attorneys Alkon and Cole, who skillfully represented that entity during the active phase of the criminal case, to withdraw, and has replaced them with an attorney who represents the Yusuf family interests and who has acted unilaterally by making overtures to the Federal prosecutor without consulting the defense team. In addition, **the Yusufs have directed United not to pay the fees of various defense team members who represent Hameds, contrary to the protocol followed in the past.**

See, HAMD201592-HAMD201593.pdf at p. HAMD201592 (Emphasis added).

On April 17, 2004, Judge Barnard, Magistrate, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, held that the attorneys' fees and expenses reimbursement by Hamed was covered under the Joint Defense Agreement and should be paid by Partnership funds:

At the mediation counsel advised that they had represented the defendant, as well as dismissed defendants, pursuant to a joint defense agreement which had been negotiated early in the litigation.

Because of a substitution of counsel and divergence in trial strategy the Joint Defense Agreement was concluded on September 19, 2012. At the close of the mediation the attorneys' billing statements were requested for

in camera review. After a thorough review of the invoices presented by counsel and the retained accounting experts, the mediator concluded that because of the termination of the Joint Defense Agreement the invoices should be resubmitted in camera for consideration of work performed prior to September 19, 2012.

Invoices were received from the Law Offices of Pamela Lynn Colon, LLC., Gordon C. Rhea, P.C., Andreozzi, Bluestein, Fickess, Muhlbauner Weber, Brown LLP, and Freed Maxick, CPA PC. Invoices were not received from Feurst, Ittleman, David, and Joseph, P.L. nor from Nizar Dewood, Esq. The subject invoices were reviewed in camera and the work performed by counsel and the accountants was in furtherance of the object of the Joint Defense Agreement. The invoices submitted are approved as follows:

Pamela Lynn Colon, LLC \$46,393.95
Gordon C. Rhea, PC. 16,737.90
Andreozzi, Bluestein LLP 118,418.57
Freed Maxick CPA, PC 151,350.00

Accordingly, the sum of \$332,900.42 is directed to be released for the restrained assets of the defendant to the Escrow Account of Andreozzi, Bluestein, in accordance with prior protocol established by Judge Raymond Finch, for distribution to counsel and experts in the sums approved pursuant to the Joint Defense Agreement.

See, HAMD599941-HAMD599944.pdf at pp. HAMD599941-HAMD599942.

On August 17, 2014, Mohammad Hamed paid the following out of his personal Banco Popular checking account: Pamela L. Colon, Esq., \$46,393.95, Gordon C. Rhea, Esq., \$16,737.90, Andreozzi, Bluestein LLP, \$118,418.57 and Freed Maxicx, CPA, PL, \$151,350.00. These fees were incurred for work completed prior to the expiration of the Joint Defense Agreement on September 19, 2012. See, JVZ-000868-JVZ-001730.pdf at p. JVZ-001211-JVZ001214.

Yusuf now is trying to contend that this was not the case and each defendant was required to pay his own individual attorney during the course of the Joint Defense Agreement. This is an absurd contention on Yusuf's part. Carried to its extreme, it would mean that the Yusuf defendants and the United Corporation would only pay \$237,691.00 or 5% of the total cost of attorneys' fees and expenses, while Hamed would pay a

whopping \$4,121,561.00 or 95% of the total. See, HAMD641485-HAMD642240.pdf, p. HAMD642214. Hamed disputes this contention and provides the March 2, 2017 declaration of Attorney Gordon Rhea and Judge Barnard's April 17, 2014 Order as support.

Hamed's CPA also provided John Gaffney a query dated February 15, 2016 asking whether these fees were reimbursed. Hamed's CPA reviewed the general ledgers from 2012 to present provided by John Gaffney for any reimbursements to Waleed for these payments or payments made by the Partnership directly to Waleed Hamed for the same period. None were found. See, JVZ-000001-JVZ-000867.pdf at p. JVZ-000044-45.

See also, Hamed's response to Yusuf's RFPD 15. Documents relating to this claim include:

- September 30, 2016 JVZ Engagement Report and Exhibits, JVZ-000001-JVZ-000867.pdf and JVZ-000868-JVZ-001730.pdf
- Gordon Rhea's March 2, 2017 declaration, Exhibit 44, HAMD641485-HAMD642240.pdf
- Judge Barnard's April 17, 2014 Memorandum and Order in the criminal case, HAMD599941-HAMD599944.pdf
- Mohammad Hamed's August 17, 2014 checks to Pamela L. Colon, Esq., Gordon C. Rhea, Esq., Andreozzi, Bluestein LLP and Freed Maxicx, CPA, PL
- September 19, 2012 email to members of the Joint Defense Agreement and Joseph DiRuzzo, Esq., from Gordon Rhea, Esq. regarding termination of the joint defense agreement, HAMD201592-HAMD201593.pdf

- September 14, 2012 letter to members of the Joint Defense Agreement from Joseph DiRuzzo, Esq. asking whether members believe he is part of the Joint Defense Agreement, HAMD201590-HAMD201591.pdf.
- September 13, 2012 letter to Joseph DiRuzzo, Esq. from Randall Andreozzi, Esq., that Attorney DiRuzzo is not a party to the Joint Defense Agreement, HAMD201586-HAMD201587.pdf.
- September 13, 2012 letter to Joseph DiRuzzo, Esq. from Pamela Colon, Esq. confirming that Attorney DiRuzzo is not a party to the Joint Defense Agreement, HAMD201588-HAMD201589.pdf.
- July 7, 2011 Order, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, regarding the immediate release of \$300,000 from United Corporation to the escrow account of the law offices of Andreozzi and Fickess, LLP, HAMD202721-HAMD202721.pdf.
- June 27, 2011 motion, Defendants' Motion for Release of Funds from United Corporation, requesting release of \$300,000 000 from United Corporation to the escrow account of the law offices of Andreozzi and Fickess, LLP, HAMD248051-HAMD248053.pdf.
- December 15, 2010 Order, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, ordering the release of \$250,000 to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD659180-HAMD659180.pdf.
- December 10, 2010 motion, Defendants' Motion for Release of Funds from United Corporation, *United States v Yusuf*, US District Court of the Virgin Islands, Division

of St. Croix, 1:05-cr-15, requesting \$250,000 to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD202691-HAMD202694.pdf.

- March 16, 2010 Order, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, ordering the release of \$1 million to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD202587-HAMD202587.pdf.
- March 1, 2010 motion, Defendants' Motion for Release of Funds from United Corporation, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, requesting \$1 million to the escrow account of Richardson Patrick Westbrook & Brickman, LLC, HAMD202558-HAMD202562.pdf.

ROG 22. Identify all facts and circumstances relating to Hamed Claim No. 129 and identify, all documents relating to that claim.

Hamed Response: Partnership funds were withdrawn by Fathi Yusuf. From those funds, he and his wife Fawzia gave Shawn Hamed \$1.5 million and Mafi Hamed \$1.5 million. Fathi Yusuf took an additional \$1 million at the same time for his family. Fathi Yusuf or his daughter has recently made a claim in 2016 for the return of the \$1.5 million he gifted to Shawn Hamed in the divorce proceedings between Shawn and his daughter. Because of the divorce claim that was made in 2016, Hamed is making a claim here to return the unequal withdrawal.

See also, Hamed's response to Yusuf's RFPD 16. Documents relating to this claim include:

- July 1, 2011 letters from Fathi and Fawzia Yusuf gifting Mufeed and Shawn Hamed \$1.5 million each, YUSF103629-YUSF103632.pdf.

- Checks and bank statements regarding the July 1, 2011 gift from Fathi and Fawzi Yusuf to Mufeed and Shawn Hamed, BDO_005293-005300.pdf
- August 12, 2011 pleading, Defendants' Motion for Release of Funds from United Corporation to the Shareholders of United Corporation, *United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15, HAMD248055-HAMD248057.pfd.

ROG 23. Identify all facts and circumstances relating to Hamed Claim No. 145 and identify, all documents relating to that claim.

Hamed Response: H-145 relates to the way the Virgin Islands Water and Power Authority ("WAPA") deposits paid by the Partnership in 1993, 1994, 1999 and 2000 were distributed after the Partnership was dissolved. Hamed contends that the deposits should have been split 50/50 and returned to each Partner. This did not happen and an unequal amount, favorable to Fathi Yusuf and United the Corporation, was distributed.

The WAPA deposit and interest for Plaza Extra-East totaled \$110,842.00, Plaza Extra-West totaled \$127,037.03 and Plaza Extra-Tutu totaled \$34,693.06, for a grand total of \$272,572.09 or \$136,286.05 per partner. See, YUSF238279-YUSF238287.pdf.

According to John Gaffney's May 17, 2016 explanation, the deposits were divided as follows:

The disposition of deposits in each location was as follows:

1. Plaza East - since there was no refund or other event and since the deposits are in favor of United Corporation without change, the balance was treated as a capital distribution.
2. Plaza West - since the deposits are in the name of Plessen Enterprises, inc. which is owned 50/50 consistent with Plaza ownership, these deposits were distributed to the partners consistent with the elimination of inter-company debt on 12/31/14. This adjustment was made after recognizing the accrued interest in the partnership.
3. Plaza STT - the deposits and accrued interest were offset against the final WAPA invoice.

I am unable to locate a copy of the final WAOA [sic] invoice in STT.

See, YUSF238182-YUSF238184.pdf at p. YUSF238279.

John Gaffney further stated that the \$34,693.06 deposit for Plaza Extra-Tutu was credited against the last bill. Unfortunately, it is unclear how much of the last bill should be attributed to the Partnership and how much should be attributed to Hamed, who purchased the store on May 1, 2015. Because John Gaffney cannot locate the final WAPA bill, the proceeds from the deposit should be split equally between the partners.

Also, it is unclear what the "inter-company" debt on 12/31/14 being eliminated was and whether it was appropriate. Absent more information on exactly what this debt was, Hamed does not agree that the inter-company debt that was eliminated was appropriate.

Hamed's CPAs also took issue with this division:

Opinion as to the Issue Identified:

We noted adjustments had been made on East & West to deposit amounts recorded in the accounting records to reflect balances at 12/31/14. The adjustment made to STT accounting records did not agree with the statements provided by WAPA.

We disagree, however, that the treatment of the deposits was accurate. All deposits were made with Partnership funds and the subsequent interest payments are also considered Partnership funds. Because the deposits and interest payments are Partnership funds, there is no justification for returning Plaza Extra East's deposit and interest to the United Corporation. Similarly, there is no justification for attributing Plaza Extra West's deposit and interest to the "elimination of inter-company debt on 12/31/14" for Plessen Enterprises, Inc. - an unexplained phrase that has no justification or documentation to support it. The St. Thomas store's treatment of the deposit and interest is also faulty. The amount should have been returned to the Partnership and not applied to the St. Thomas WAPA bill. As John Gaffney cannot find a copy of the WAPA invoice that the deposit and interest were allegedly applied against, this treatment in the general ledger cannot be substantiated. Further, there is no evidence of payment, receipt or refund of WAPA deposits. . . . See, JVZ-000001-JVZ-000867.pdf at p. JVZ-000030.

See also, Hamed's response to Yusuf's RFPD 17. Documents relating to this claim include:

- September 30, 2016 JVZ Engagement Report and Exhibits
- May 17, 2016 Letter to Joel Holt, Esq., from John Gaffney, Controller, regarding the treatment of WAPA deposits on the Plaza Extra books and associated documents

ROG 24. Identify all facts and circumstances relating to Hamed Claim No. 154 and identify, all documents relating to that claim.

Hamed Response: H-154 relates to Hamed's payment of attorneys' fees and expenses during the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) from January 1, 2012 to April 16, 2015.

The defendants have repeatedly asserted that Fathi Yusuf was in charge of everything. This also extends to the extensive money laundering scheme that Mr. Yusuf created and directed. Instead of protecting the Partnership, Mr. Yusuf instructed his son "Maher" Mike Yusuf and Nejeah Yusuf, as well as Waleed "Wally" and Waheed "Willie" Yusuf to engage in an enterprise taking Partnership funds off island and depositing those funds in various foreign bank accounts. Mike Yusuf, in turn, instructed his sister Hoda to take the Partnership cash he had given her and purchase cashier's checks. Fathi Yusuf also enlisted his relatives in Jordan (his brother and niece) and St. Maarten (his nephew and niece) to launder money for him.

An FBI Interview demonstrates that Fathi Yusuf hid the actual amount of money generated at the Plaza Extra stores by instructing United's comptroller, John Irvin, to base sales on the stores' deposits, not on its actual sales:

IRVIN was told by FATHI YUSUF that store sales would be based on deposits. IRVIN said that normal accounting procedures allow accountants to conduct internal audits. IRVIN advised that YUSUF told him that internal audits were being handled and to simply continue to use deposits to calculate sales. IRVIN said that YUSUF told him this early on and that YUSUF was very emphatic. IRVIN never revisited the subject of sales with

YUSUF and continued to base sales on daily deposits. (See, HAMD639822-HAMD639830.pdf at p. HAMD639823).

Fathi Yusuf also artificially manufactured the year-end inventory for each store at \$3 million:

IRVIN was shown copies of February and March of 1999 gross receipts sales tax figures. IRVIN stated that he had a discussion with FATHI YUSUF concerning cost of goods sold. YUSUF told IRVIN that it was not possible to determine actual numbers for cost of goods sold. Per YUSUF'S instructions, IRVIN was told to determine cost of goods sold in whatever manner would reflect approximately \$3 million in year ending inventory for each store. IRVIN also had conversations with WILLIE HAMED concerning cost of goods sold and what the average markup on merchandise was.

IRVIN said that HAMED was not specific but understood that YUSUF wanted ending inventory to be around \$3 million. IRVIN advised that to determine cost of goods sold he would use a formula reflecting a 42% markup, or more often than not, simply plug in numbers so the \$3 million number would be met. IRVIN stated that the reason YUSUF wanted the number for inventory to be around \$3 million for each store was to show a lower net income. If taxable income was too high, YUSUF would tell IRVIN to adjust cost of goods sold to show a decrease in the companies profit. IRVIN stated YUSUF normally had him adjust the numbers presented to him which reflected cost of goods sold. (See, HAMD639822-HAMD639830.pdf at p. HAMD639823)

Additionally, Fathi Yusuf artificially lowered the amount of sales at Plaza Extra Tutu.

IRVIN advised that the rent paid to TUTU PARK MALL was based partly on sales. When the rent was due, YUSUF would go into his office and return to give IRVIN the numbers to be used to pay the portion of the rent that was based on sales. (See, HAMD639822-HAMD639830.pdf at p. HAMD639828)

Irwin's account and Fathi Yusuf's own multiple filings here demonstrate that he, personally, ran the operation and directed the individuals. These activities led the federal government to indict the United Corporation, Fathi, Mike and Nejeh Yusuf and Wally and Willie Hamed for money laundering. Fathi Yusuf was in charge. The losses include attorneys' fees and expenses paid in defense of the money laundering charges.

See also, Hamed's response to Yusuf's RFPD 18. Documents relating to this claim include:

- September 30, 2016 JVZ Engagement Report and Exhibits, JVZ-000001-JVZ-000867.pdf and JVZ-000868-JVZ-001730.pdf
- Checks and bank statements for attorney and accounting fees in the criminal case, dated from January 1, 2012-April 16, 2015
- May 22, 2003 Hoda Yusuf Fathi Hamed grand jury testimony, YUSF221358-YUSF221414.pdf.
- August 1, 2003, John Benson Irvin FBI interview, HAMD639822-HAMD639830.pdf.

ROG 25. Identify all facts and circumstances relating to Hamed Claim No. 161 and identify, all documents relating to that claim.

Hamed Response: H-161 relates to Hamed's payment of attorneys' fees and expenses during the criminal case (*United States v Yusuf*, US District Court of the Virgin Islands, Division of St. Croix, 1:05-cr-15) from September 17, 2006 through December 22, 2011.

Documents relating to this claim include:

- September 30, 2016 JVZ Engagement Report and Exhibits, JVZ-000001-JVZ-000867.pdf and JVZ-000868-JVZ-001730.pdf
- 94 checks for attorney and accounting fees in the criminal case, dated from September 28, 2006 through December 22, 2011

ROG 26. Identify all facts and circumstances relating to Hamed Claim No. 162 and identify, all documents relating to that claim.

Hamed Response: H-162 relates to claims based on monitoring reports prepared by contractors for the federal government between 2006-2012. Hamed is looking for

instances when Yusuf expended Partnership funds for non-Partnership expenses. Hamed has discovery requests to obtain these monitoring reports, but no additional reports were supplied. A motion to compel is necessary. Once the monitoring reports have been obtained, this interrogatory will be updated.

ROG 27. Identify all facts and circumstances relating to Hamed Claim No. 163 and identify, all documents relating to that claim.

Hamed Response: H-163 relates to the loss of assets due to wrongful dissolution, including the attorneys' fees Hamed has had to expend to ensure that Hamed's status as a partner was secure. As stated regarding the \$2.7 million, Yusuf, stole funds, made claims, attempted to get the Hameds thrown out by the police, obtained criminal prosecution by lying to the police, and otherwise caused the wrongful dissolution of the partnership.

The central fact of a partnership is that it is an agreement between two or more persons "to carry on as co-owners a business for profit formed under section 22 of this chapter, predecessor law, or comparable law of another jurisdiction." 26 V.I.C. § 2. On November 7, 2014, this Court declared that a partnership has existed between Hamed and Yusuf since 1986.

It is undisputed and a matter of record that in 2012, Yusuf declared in pleadings before this Court that no partnership existed and thereby attempted to take *the ongoing businesses for himself*. His attempt to take all of the Partnership's assets has created numerous costs and losses, as described below.

As the best example of this, Yusuf's counsel stated to the V.I. Supreme Court that no such partnership existed and that all Hamed was entitled to was some sort of "annuity"

to be determined by Yusuf. See Transcript of Oral Argument, *Yusuf v. Hamed*, S.Ct. Civ No. 2013-CV-0040 (July 9, 2013) at 7-9.

JUSTICE HODGE: -- and now its an annuity?

MR. DIRUZZO: Well, that's -- that's my best way to -- to describe or couch, which is why we characterize it as an almost uncharacteristic or uncharacterizable agreement. It almost defies your typical definitions because it is so out of the ordinary. . . .

Thus, Yusuf denied the partnership and attempted to take and run its three businesses.

A. Costs to Stop Taking of All Partnership Assets Generally

As a result, Plaintiff Hamed has had to undertake the costs of this legal action to establish the existence of the partnership. *Section 602 of the Revised Uniform Partnership Act*, enacted in the USVI at V.I. 26 § 122 (Partner's power to dissociate; wrongful dissociation) provides:

SECTION 602. PARTNER'S POWER TO DISSOCIATE; WRONGFUL DISSOCIATION.

- (a) A partner has the power to dissociate at any time, rightfully or wrongfully, by express will pursuant to Section 601(1).
- (b) **A partner's dissociation is wrongful** only if:
 - (1) it is in breach of an express provision of the partnership agreement;** or
 - (2) in the case of a partnership for a definite term or particular undertaking, before the expiration of the term or the completion of the undertaking:
 - (i) the partner withdraws by express will, unless the withdrawal follows within 90 days after another partner's dissociation by death or otherwise under Section 601(6) through (10) or wrongful dissociation under this subsection;
 - (ii) the partner is expelled by judicial determination under Section 601(5);
 - (iii) the partner is dissociated by becoming a debtor in bankruptcy; or
 - (iv) in the case of a partner who is not an individual, trust other than a business trust, or estate, the partner is expelled or otherwise dissociated because it willfully dissolved or terminated.

(c) A partner who wrongfully dissociates is liable to the partnership and to the other partners for damages caused by the dissociation. The liability is in addition to any other obligation of the partner to the partnership or to the other partners.

The *Official Comments* to 602(c) state:

Comment

3. Subsection (c) provides that a wrongfully dissociating partner is liable to the partnership and to the other partners for any damages caused by the wrongful nature of the dissociation. **That liability is in addition to any other obligation of the partner to the partnership or to the other partners.** For example, the partner would be liable for any damage caused by breach of the partnership agreement or other misconduct. The partnership might also incur substantial expenses resulting from a partner's premature withdrawal from a term partnership, such as replacing the partner's expertise or obtaining new financing. The wrongfully dissociating partner would be liable to the partnership for those and all other expenses and damages that are causally related to the wrongful dissociation.

The most basic provision of the partnership is that Yusuf and Hamed were partners, and thus were 50% owners of all assets. Yusuf violated that and tried to take everything. (Or at least he tried to take everything minus some "annuity" he calculated was owing.)

There are no fact issues remaining about the existence of the partnership. There are no fact issues remaining as to Yusuf's absolute denial of that partnership for the year and a half it took to wring that admission out of him. There is no dispute of fact that **but for** Yusuf's wrongful actions, Hamed would not have incurred the costs and losses necessary to (1) recover his 50% of the assets, (2) provide access to accounts and (3) obtain a declaration. As a matter of law, there being no further issues of fact, Yusuf "is liable to the partnership and to the other partners for **damages caused by the dissociation**. The liability is in addition to any other obligation of the partner to the partnership or to the other partners."

B. Recovery of Fees as One Element of Damages

Beyond the fact that a successful USVI Plaintiff can recover attorney fees,¹⁹ fees for RUPS litigation occasioned by the breach of the partnership agreement and for wrongful dissolution are recoverable. See, e.g., *Meyer v. Christie*, No. 07-2230-CM, 2009 WL 3294001, at *1 (D. Kan. Oct. 13, 2009); same on appeal *Meyer v. Christie*, 634 F.3d 1152, 1160–61, 2011 WL 873437 (10th Cir. 2011); *State Farm Fire & Cas. Co. v. Christie*, No. 10-CV-2699, 2015 WL 751808, at *3 (D. Kan. Feb. 23, 2015); *Cratte v. Estabrook*, No. 1 CA-CV 09-0239, 2010 WL 2773372, at *3 (Ariz. Ct. App. July 13, 2010); and *Saint Alphonsus Diversified Care, Inc. v. MRI Associates, LLP*, 148 Idaho 479, 489, 224 P.3d 1068, 1078, 2009 WL 5252829 (2009).

Fees for the litigation occasioned by the breach of the partnership agreement and for wrongful dissolution are not accounting damages and require a jury. See, e.g., *Meyer v. Christie*, No. 07-2230-CM, 2009 WL 3294001, at *1 (D. Kan. Oct. 13, 2009); same on appeal *Meyer v. Christie*, 634 F.3d 1152, 1160–61, 2011 WL 873437 (10th Cir. 2011); *State Farm Fire & Cas. Co. v. Christie*, No. 10-CV-2699, 2015 WL 751808, at *3 (D. Kan. Feb. 23, 2015); *Cratte v. Estabrook*, No. 1 CA-CV 09-0239, 2010 WL 2773372, at *3 (Ariz. Ct. App. July 13, 2010); and *Saint Alphonsus Diversified Care, Inc. v. MRI Associates, LLP*, 148 Idaho 479, 489, 224 P.3d 1068, 1078, 2009 WL 5252829 (2009).

Pursuant to the Rules of the Court, the supporting documents are the bills and payments for counsel -- which will be provided, and the fees determined, at the end of litigation.

C. Other Losses and Costs

¹⁹ The claims here sound in tort. The attempt by Yusuf/United to convert all of the partnership was abject, unadulterated **conversion** – and additional, non-accounting monetary damages were pleaded. The Amended Complaint specifically asked, at item 7 of relief, for “[a]n award of compensatory damages against the defendants.”

Hamed, as the partner, also lost the value of:

(1) the Partnership's diminution of income, profits and time occasioned by the Yusuf taking and efforts to correct those. The supporting documents will be expert reports not yet due under the Discovery Plan.

(2) the costs of accountants and accounting experts to determine the amount that Yusuf took between 2006 and 2012. The supporting documents will be expert reports not yet due under the Discovery Plan.

(3) the costs of accountants and accounting experts to determine the amount that Yusuf took between 2012 and the end of the Partnership. The supporting documents will be expert reports not yet due under the Discovery Plan.

(4) the costs of 100% of Mr. Gaffney's fees to determine review the accounting as part of the Claims process. The supporting documents will be expert reports not yet due under the Discovery Plan.

(5) the damage to trade reputation occasioned by the Yusuf's acts and statements. The supporting documents will be expert reports not yet due under the Discovery Plan.

ROG 28. State whether you dispute any of United's claims as to the Black Book Balance of \$49,997 and identify all documents relating to your dispute.

Hamed Response: Hamed disputes this debt, the claims and the facts as stated. First, the documentary evidence provided by Yusuf is dated in 1993-1994. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. This was a stale claim before the FBI-raided the premises.

Further, the documentary evidence Yusuf provided is merely a couple of pages out of one such so-called black book. It is impossible to say definitively that the Partnership

owes this amount to United, because all of the records of the Partnership are not available from 1993 forward. It is a partial accounting at best. This alleged debt could have been paid years ago or offset by other amounts, but the documentary evidence no longer exists.

Even Yusuf's own accounting expert, BDO, asserted in its report that that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's September 30, 2016 Report, pages 2, 22. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

ROG 29. Identify all facts and circumstances which give rise to any dispute you have with United's claims as to the Ledger Balance of \$200,000 and identify all documents relating to your dispute.

Hamed Response: Hamed disputes this debt. First, the documentary evidence provided by Yusuf is dated in 1994, 1995 and 1998. Pursuant to 5 V. I.C. §31 (3), the statute of limitations for actions for debt, breach of contract and conversion of property is 6 years, making this well outside of the time period for bringing a claim. Further, the documentary evidence Yusuf provided is merely a couple of pages out of a ledger, the entire ledger was not even produced. It is impossible to say definitively that the Partnership owes this amount to United, because all of the records of the Partnership are not available from 1993 forward. This alleged debt could have been paid years ago, but the documentary evidence no longer exists. Even Yusuf's own accounting expert, BDO, asserted in its report that "records were kept in an informal manner" and "accounting records and/or documents provided to us for the periods prior to 2003 are incomplete." BDO's

September 30, 2016 Report, pages 2, 22. Finally, this claim is outside of the time period Judge Brady set for bringing claims against the Partnership. See Brady decision: *Hamed v. Yusuf, et al.*; SX-12-CV-370; SX-14-278; SX-14-287 Memorandum Opinion and Order Re Limitations on Accounting, July 21, 2017.

ROG 30. Identify all facts and circumstances which give rise to any dispute you have Yusuf s claims as to the Water Revenue from Plaza Extra East in the amount of \$693,000 and identify all documents relating to your dispute.

Hamed Response: Hamed disputes this debt. Yusuf contends that from April 1, 2004, all revenue from the sale of water that was collected by Plaza Extra-East was to be paid to United. The water sales actually did not belong to United, but to the Partnership.

A little background is in order. When the Partnership purchased the one-acre property at Plaza Extra-East, it also built, with Partnership funds, a 400,000 to 450,000 gallon cistern on the property. Additionally, one or two water wells also were used to fill the cistern. This was during the 1990s. At that time, there was a water shortage on island, WAPA had difficulty consistently providing water and, other than WAPA, there really weren't other companies selling water. The Partnership filled this gap by selling water, starting approximately in 1994. Yusuf is correct that during 1994-2004, the proceeds from the sale of the water went to charity (half to Mr. Yusuf's choice of charity and the other half to Mr. Hamed's choice of charity) and to pay the expenses of the water generation and delivery. At its peak, in the 1990s, 10 or more trucks a day, each with a capacity of about 30,000 gallons, delivered water to St. Croix residents.

After April 1, 2004, the funds generated from the enterprise went to the Partnership, rather than to charity. The sale of water dropped off quite dramatically for the Partnership in the 2000s. Competitors, such as Marcos and others, entered the

market. To get a sense of the scope, in the 2000s, the Partnership was sending out one or two trucks a day to deliver water, rather than the previous 10 or more trucks.

Eventually, Yusuf Yusuf was in charge of monitoring the water sales. For a time, water sales were recorded on hand written receipts, but there weren't any controls to ensure that the vendors did not take more water than they were billed. Wally Hamed then recommended, and Yusuf Yusuf implemented, a key being programmed into the register at the service desk to record the sales of water.

Hamed objects to this blatant claim by Yusuf & United for a number of reasons. First, neither United nor Yusuf has provided any document memorializing this so-called agreement between the Partnership and United because one does not exist. Next, Yusuf picks two years of sales, 1997 and 1998, and extrapolates those two years of sales into an average of \$5,291.66 per month and applies that monthly figure to every month from April 1, 2004 through February 28, 2015. As is explained by the chronology, water sales dropped off dramatically in the 2000s, so of course Yusuf picks two years of sales during the most profitable years. Third, Yusuf does not provide *any* documentation to support the sales for 1997 and 1998, nor does he provide *any* documentation to support water sales from April 1, 2004 through February 28, 2015, even though both paper copy receipts and information from the register could be generated to show actual sales. Fourth, and perhaps most galling, United doesn't have any right to the water, as it is Partnership water, so this really isn't money United is entitled. Finally, this leads to Hamed's belief that this is another example of what Special Master Ross described as "a transaction prohibited by law and tainted by a conflict of interest and self-dealing," when discussing the inflated rents United tried to collect on Bay 1. Yusuf is not fulfilling his fiduciary duty to the Partnership and instead is trying to loot the Partnership for his corporation, United.

Note: ROGs 31 & 32 were revised by Yusuf on March 30, 2018 and will be answered separately.

Dated: May 15, 2018

A handwritten signature in blue ink, appearing to read "Carl J. Hartmann III", with a long horizontal flourish extending to the right.

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2018, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

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VERIFICATION

I hereby certify under penalty of perjury that the facts contained in each of the foregoing responses to interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: May, 15, 2018


_____ Attesting Individual

TERRITORY OF THE UNITED STATES VIRGIN ISLANDS

DISTRICT OF St. Croix) ss.

On this, the 15th day of May, 2018, before me, the undersigned officer, personally appeared the signor known to me (or satisfactorily proven to be) the person whose name is subscribed to the within document and acknowledged that he/she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.


_____ Notary Public

NOTARY PUBLIC
JERRI FARRANTE
Commission Exp: September 3, 2019
NP-93-15

**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

Consolidated with

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

vs.

FATHI YUSUF, *Defendant.*

Case No.: SX-2014-CV-278

Consolidated with

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*
Defendants.

Case No.: ST-17-CV-384

**PLAINTIFF/COUNTERCLAIM DEFENDANT WALEED HAMED'S
RESPONSES TO FATHI YUSUF'S RESUBMISSION OF INTERROGATORIES 31-32
AND NEW INTERROGATORIES 33-34 TO HAMED**

Objection to all of the following:

Pursuant to the stipulated Discovery Plan of January 29, 2018, this discovery is limited to the Revised Claims -- as agreed to by the parties pursuant to the direction of the Special Master. All discovery must, therefore, relate to, or be calculated to lead to discoverable evidence as to one of the Claims set forth. Yusuf does not identify the claims to which inquiries relate -- and most do not relate to any of the remaining Revised Claims. (In Hamed's discovery each item is related to the specific claim.)

**HAMED RESPONSES TO FATHI YUSUF'S RESUBMISSION OF
INTERROGATORIES 31-32 AND NEW INTERROGATORIES 33-34**

ROG 31. Explain the disposition of all of the foreign property and accounts described in Exhibit 7 including what happened to these accounts, when they were closed, and their balance as of September 17, 2006 as well as the current status of those properties in Hamed's name and identify all documents relating to your explanation.

Hamed Response: Object. This request is objected to as being beyond the scope of the current accounting process, as it involves foreign assets. Subject to that objection, at some point between 2010-2012, Hamed obtained all of his account statements for the accounts he had in his name in Jordan and provided those to Fathi Yusuf. Since that time period, it is Waleed Hamed's belief that his father did not make any effort to obtain more up-to-date statements. Finally, Waleed Hamed does not know the current status of his father's Jordanian bank accounts listed below.

Arab Bank, Account No. 9020-415410-700 (JOD) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Arab Bank, Account No. 9020-415410-500 (JOD) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Arab Bank, Account No. 9020-415410-510 (USD) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Arab Bank, Account No. 9020-415410-570 (ILS) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Arab Bank, Nablus Branch, Account No. 9020-415410-710 (USD) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Cairo Aman Bank, Account No. 001 0001629 012123 833 (JOD) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Cairo Aman Bank, Account No. 001 0001629 03 2123 833 (USD) – This was Mohammad Hamed's bank account. As he is no longer living, we are unable to ask him what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Cairo Aman Bank, Account No. 02501171878 00 (USD) – This account is in Wally Hamed's name. However, this account was used in the money laundering scheme for the Plaza Extra stores that was the subject of the 2001 FBI raid and on the stores and the subsequent criminal case and conviction of United Corporation. Wally Hamed does not have these account statements, as Fathi Yusuf had them sent to himself at the Plaza Extra-Tutu store. Fathi Yusuf is in the best position to answer what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

Banque Francaise Commerciale, Account No. 40-60-63878-90 – This account is in Wally Hamed's name. However, this account was used in the money laundering scheme for the Plaza Extra stores that was the subject of the 2001 FBI raid and on the stores and the subsequent criminal case. Wally Hamed does not have these account statements, as Fathi Yusuf had them sent to his relative, Isam Yousuf, on Sint-Maarten. There is a document that was gathered by the FBI, indicating that this account was closed sometime in 2002. See, HAMD204104-HAMD204104. However, Fathi Yusuf is in the best position to answer what happened to the account, when the account was closed and the balance of the account (if any) on September 17, 2006.

Banque Francaise Commerciale, Account No. 40-60-63878-91 – This account is in Wally Hamed's name. However, this account was used in the money laundering scheme for the Plaza Extra stores that was the subject of the 2001 FBI raid and on the stores and the subsequent criminal case. Wally Hamed does not have these account statements, as Fathi Yusuf had them sent to his relative, Isam Yousuf, on Sint-Maarten. Fathi Yusuf is in the best position to answer what happened to the account, if the account was closed and the balance of the account (if any) on September 17, 2006.

ROG 32. Identify all facts and circumstances which give rise to any dispute you have with Yusuf's claims to the loss of going concern value as to the Plaza Extra West Store as identified by Yusuf in Exhibit 6, attached hereto and identify all documents relating to your explanation.

Hamed Response: This case arose over a dispute as to whether the three Plaza Extra supermarkets (two on St. Croix and one on St. Thomas) were owned by United Corporation (owned by Fathi Yusuf's family) or by a partnership consisting of Fathi Yusuf and Mohammad Hamed. After a full hearing, Judge Brady found the stores were owned by the 2-person partnership, 2013 WL 1846506, affirmed on appeal at 2013 WL 5429498. While this was just a preliminary finding sufficient to issue an injunction, it was not a final determination on the merits. Fathi Yusuf then decided to concede that there was a partnership, which he promptly moved to dissolve. His proposed dissolution plan called for the closure of all three stores, as, he stated, neither of the two stores on St. Croix (Plaza East and Plaza West) had a lease and the store on St. Thomas only had a few years left on its lease. Three of Mohammad Hamed's sons formed, KAC357, Inc., and obtained a lease from the owner of the property where Plaza West was located, Plessen Enterprises, Inc. The lease commenced only after the partnership vacated the premises. While the validity of that lease was challenged by Yusuf, it was found to be valid by Judge Brady, as well as by Judge Willocks -- in a Yusuf lawsuit filed against Plessen.

When the Plaza West store was transferred, he signed an order transferring that store "free and clear of any claims of Yusuf," quoting from Judge Brady's January 7, 2015, Wind Up Order. Thus, it has already been determined by the January Order (as incorporated into the transfer Order of the Special Master) that **Yusuf has no claim**

against Hamed associated with the transfer of the Plaza West store. In short, Yusuf's additional claim for half of its value "as a going concern" is meritless.

Second, even if such a claim survived, it would have no value, as the Plaza West store had no lease, and hence, nothing to sell, other than its inventory and equipment, which was sold with the transfer order. Notwithstanding this fact, Yusuf obtained an expert report from Integra to opine on the value of this claim. However, that valuation is contingent on one pivotal assumption that is false. At the outset of that opinion, Integra notes the definition of the "Extraordinary Assumptions" contained in the report, stating Extraordinary Assumptions and Hypothetical Conditions The value conclusions are subject to the following extraordinary assumptions that may affect the assignment results. An extraordinary assumption is uncertain information accepted as fact. The report then continues by listing one such assumption...."3. It is our understanding that the real estate was owned by a related entity as of the date of valuation. For the purposes of valuing the business entity separately from the value of the real estate (which was separately appraised), we have assumed that the entity operating the business leases the property from a separate entity at market rent.

However, this assumption is false, as there was never a lease for the Plaza West store, as Yusuf conceded in his pleadings in this case. In this regard, when Yusuf filed his proposed liquidation plan, he admitted to the Court that the West store could not be sold as a going concern because it had no such lease. "Thus, the Plaza Extra Stores cannot be sold as a going concern because of the absence of commercial leases for Plaza Extra - East and Plaza Extra - West and the existence of only a short term less than 5 years) remaining on the lease between United and Tutu Park Mall, Ltd. for Plaza Extra-Tutu Park. Hence, liquidation of the Plaza Extra Stores is warranted."

Thus, as there was no lease, the Integra calculation is based on an assumption that does not in fact exist. In short, once this "assumption" is removed, the Plaza West store has no "ongoing value" under Integra's valuation based on this assumption.

Also, this Yusuf claim is the subject of a pending motion to strike this claim, which has been fully briefed, which briefs and attached exhibits are all incorporated herein by reference.

ROG 33. Identify the person or persons whose handwriting is contained on Exhibits G and H, attached hereto and if it is more than one person, identify which portions of Exhibit G and H represent each person's handwriting.

Hamed Response: Waleed Hamed did not write Exhibits G and H, so he does not have direct knowledge who wrote the documents, but based on his experience with the handwriting of the Yusuf's, he believes the following were the drafters of the documents:

Exhibit G:

Page FY 004477 - Fathi Yusuf's handwriting.

Page FY 004476 - Fathi Yusuf's handwriting.

Page FY 004475 - All of this page is in Fathi Yusuf's handwriting, except for the following signatures: Waleed Hamed's signature next to the 6/9/94 entry for \$15,000, the 6/8/94 entry for \$5,000 and 7/13/94 entry for \$2,500. Mohammad Hamed's signature is next to the 5/14/94 for \$5,000.

Page FY 004474 – Fathi Yusuf's handwriting.

Page FY 004473 – Fathi Yusuf's handwriting.

Exhibit H:

Page FY 014955 – Maher Yusuf's handwriting.

ROG 34. Identify all spreadsheets, proposals and mediation assessments or statements in the Criminal Case, which reflect unreported income as to any of the parties in the Criminal Case including identification of the date each document was prepared and the name of the attorney or accountant who prepared it.

Hamed Response: Hamed objects to producing spreadsheets, proposals and mediation assessments or statements in the Criminal Case prepared by Hamed's attorneys as they are protected by the attorney work product. Subject to that objection, Hamed identifies the following documents as responsive to the request:

- Exhibit 49 to the March 6, 2017 hearing before Judge Brady in this case, HAMD641485-HAMD642240.pdf. This was prepared by Attorney Carl Hartmann with paralegal assistance shortly before the March 6, 2017 hearing.
- Overage 1996-2001 to Fathi Yusuf - US Gov Calculation prepared on September 28, 2014 by Attorney Carl Hartmann with paralegal assistance, HAMD659858-HAMD659858.pdf.

Also, please see the following:

- Draft Summary Schedules, letter transmitting document dated December 28, 2004. prepared by the FBI and US Department of Justice. Hamed does not know the specific attorney or accountant who prepared the document, HAMD629722-HAMD630014.pdf.
- Draft Summary Schedules, dated January 4, 2005 and prepared by FBI and US Department of Justice. Hamed does not know the specific attorney or accountant who prepared the document, HAMD612386-HAMD612642.pdf.

- Letter to Hank Smock from Ron Soluri, RSM McGladrey, attaching "relevant data on the St. Martin and Jordan bank accounts," dated December 16, 2004, HAMD644447-HAMD644512.pdf.

Dated: May 15, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May, 2018, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

Hon. Edgar Ross

Special Master
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CERTIFICATE OF WORD/PAGE COUNT

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



VERIFICATION

I hereby certify under penalty of perjury that the facts contained in each of the foregoing responses to interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: May, 15, 2018

 Attesting Individual

TERRITORY OF THE UNITED STATES VIRGIN ISLANDS

DISTRICT OF ST-Croix) ss.

On this, the 15th day of May, 2018, before me, the undersigned officer, personally appeared the signor known to me (or satisfactorily proven to be) the person whose name is subscribed to the within document and acknowledged that he/she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

 Notary Public

NOTARY PUBLIC
JERRI FARRANTE
Commission Exp: September 3, 2019
NP-93-15