

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

COMES, now, the Plaintiff, by counsel, and hereby gives notice of the service of the Plaintiff's Privilege Log with regard to the five discovery responses served on May 15, 2018 -- via CaseAnywhere, on May 17, 2018.

Dated: May 17, 2018

A handwritten signature in blue ink, reading "Carl J. Hartmann III". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th 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).



Hamed Privilege Log
Hamed v Yusuf , 2012-cv-370
May 17, 2018

Privilege	Bates Range	Date	To/Recipient(s)	From/ Author(s)	CC'd	BCC'd	Document Type	Privilege Notes
Atty-Client	HAMD562243- HAMD562249	4/13/2013	Waheed Hamed, Waleed Hamed, Hisham Hamed, Carl Hartmann, Joel Holt, Kim Japinga	Mufeed Hamed	N/A	N/A	Email	Email regarding Wadda Charriez and Raed Hamed
Atty Work Product	HAMD592454- HAMD592454	11/14/2013	Donovan Hamm	Joel Holt	N/A	N/A	Letter	Letter regarding documents provided to Attorney Donovan Hamm
Atty-Client	HAMD261905- HAMD261924	12/??/13	Joel Holt	Waleed Hamed	N/A	N/A	Check	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD261905R-HAMD261924R
Atty-Client	HAMD261925- HAMD261938	12/??/13	Joel Holt	Waleed Hamed	N/A	N/A	Check	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD261925R-HAMD261938R
Atty-Client	HAMD592667- HAMD592668	12/??/13	N/A	N/A	N/A	N/A	Check	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD592667- HAMD592668
Atty-Client and Atty Work Product	HAMD592602- HAMD592632	12/??/13	Joel Holt, Carl Hartmann	Mufeed Hamed	N/A	N/A	Notes	Notes from attorney/client conversation about Yusuf 2001 chits and attorney summary
Atty-Client and Atty Work Product	HAMD592045- HAMD592071	12/??/13	Joel Holt, Carl Hartmann	Mufeed Hamed	N/A	N/A	Notes	Notes from attorney/client conversation about Yusuf 2001 chits

Hamed Privilege Log
Hamed v Yusuf , 2012-cv-370
May 17, 2018

Privilege	Bates Range	Date	To/Recipient(s)	From/ Author(s)	CC'd	BCC'd	Document Type	Privilege Notes
Atty-Client	HAMD592647- HAMD592647	12/??/13	Joel Holt	Waleed Hamed	N/A	N/A	Notes	Notes prepared by the client at the direction of Attorney Joel Holt regarding checks. Redacted version: HAMD592647R-HAMD592647R
Atty-Client and Atty Work Product	HAMD592045- HAMD592071	12/??/13	N/A	Kim Japinga	N/A	N/A	Notes	Notes of conversations between Mufeed Hamed and Kim Japinga, paralegal regarding Partnership withdrawals
Atty-Client and Atty Work Product	HAMD592505- HAMD592601	12/??/13	N/A	Kim Japinga	N/A	N/A	Notes	Notes of conversations between Mufeed Hamed and Kim Japinga, paralegal regarding Partnership withdrawals
Atty-Client and Atty Work Product	HAMD592082- HAMD592168	12/??/13	N/A	Kim Japinga	N/A	N/A	Notes	Notes of conversations between Mufeed Hamed and Kim Japinga, paralegal regarding Partnership withdrawals
Atty Work Product	HAMD593192- HAMD593192	12/9/2013	Donovan Hamm	Joel Holt	N/A	N/A	Letter	Letter regarding expert report
Atty-Client	HAMD595107- HAMD595109	12/20/2013	Joel Holt, Waleed Hamed, Waheed Hamed, Mufeed Hamed, Carl Hartmann, Kim Japinga	Hisham Hamed	N/A	N/A	Email	Email regarding payroll
Atty-Client	HAMD633373- HAMD633374	02/11/14 2:42 p.m.	Waheed Hamed	Pamela Colon	Waleed Hamed Joel Holt	N/A	Email	Email regarding outstanding invoices
Atty-Client	HAMD597476- HAMD597476	3/7/2014	Carl Hartmann	Hisham Hamed	N/A	N/A	Email	Email regarding taxes
Atty-Client	HAMD630147- HAMD630147	??/??/15	N/A	Waleed Hamed	N/A	N/A	Other	Document prepared by client in response to counsel's question regarding insurance

Hamed Privilege Log
Hamed v Yusuf , 2012-cv-370
May 17, 2018

Privilege	Bates Range	Date	To/Recipient(s)	From/ Author(s)	CC'd	BCC'd	Document Type	Privilege Notes
Atty Work Product	HAMD631455- HAMD631456	01/15/16 12:25 p.m.	Carl Hartmann	Karen Stair	Joel Holt, Kim Japinga	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631460- HAMD631462	01/15/16 3:22 p.m.	Karen Stair	Carl Hartmann	Joel Holt, Kim Japinga	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	SCOT500514- SCOT500517	01/15/16 3:35 p.m.	Carl Hartmann	Karen Stair	Joel Holt, Kim Japinga	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631470- HAMD631473	01/15/16 3:42 p.m.	Carl Hartmann	Karen Stair	Joel Holt, Kim Japinga	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631474- HAMD631477	01/15/16 3:43 p.m.	Karen Stair	Carl Hartmann	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631478- HAMD631481	01/15/16 3:48 p.m.	Carl Hartmann	Karen Stair	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631482- HAMD631485	01/15/16 3:59 p.m.	Karen Stair	Carl Hartmann	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631486- HAMD631490	01/15/16 4:00 p.m.	Carl Hartmann	Karen Stair	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	SCOT500538- SCOT500539	1/19/2016	Carl Hartmann	Karen Stair	N/A	N/A	Email	Email regarding signature cards
Atty Work Product	HAMD631507- HAMD631511	01/19/16 11:13 a.m.	Karen Stair	Carl Hartmann	N/A	N/A	Email	Email regarding the Plessen file
Atty Work Product	HAMD631933- HAMD631937	02/09/16 11:01 a.m.	Carl Hartmann	Karen Stair	Kim Japinga	N/A	Email	Email regarding the Plessen file
Atty Work Product	HAMD631938- HAMD631942	02/09/16 11:04 a.m.	Karen Stair	Carl Hartmann	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631943- HAMD631948	02/09/16 11:19 a.m.	Carl Hartmann	Karen Stair	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD631949- HAMD632196	02/10/16 4:43 p.m.	Carl Hartmann, Kim Japinga	Karen Stair	N/A	N/A	Email	Email regarding United Corporation Operating file

Hamed Privilege Log
Hamed v Yusuf , 2012-cv-370
May 17, 2018

Privilege	Bates Range	Date	To/Recipient(s)	From/ Author(s)	CC'd	BCC'd	Document Type	Privilege Notes
Atty Work Product	HAMD632197-HAMD632345	02/10/16 4:45 p.m.	Carl Hartmann, Kim Japinga	Karen Stair	N/A	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD632346-HAMD632347	02/10/16 4:47 p.m.	Karen Stair	Carl Hartmann	Kim Japinga	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD632348-HAMD632349	02/10/16 5:00 p.m.	Carl Hartmann	Karen Stair	Kim Japinga	N/A	Email	Email regarding United Corporation Operating file
Atty Work Product	HAMD632350-HAMD632351	02/10/16 5:13 p.m.	Karen Stair, Carl Hartmann	Carl Hartmann	Kim Japinga	N/A	Email	Email regarding signature cards
Atty Work Product	HAMD632352-HAMD632354	02/11/16 8:42 a.m.	Carl Hartmann	Karen Stair	Kim Japinga	N/A	Email	Email regarding signature cards
Atty Work Product	HAMD632355-HAMD632357	02/11/16 11:06 a.m.	Karen Stair	Carl Hartmann	Kim Japinga	N/A	Email	Email regarding signature cards