

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

UNITED CORPORATION,)	
)	
Plaintiff,)	CASE NO. SX-13-CV-152
)	
vs.)	ACTION FOR DAMAGES
)	
WADDA CHARRIEZ,)	JURY TRIAL DEMANDED
)	
Defendant.)	

WADDA CHARRIEZ,)	
)	
Counter-Claimant,)	CASE NO. SX-13-CV-152
)	
vs.)	ACTION FOR DAMAGES
)	
UNITED CORPORATION,)	JURY TRIAL DEMANDED
)	
Defendant.)	

WADDA CHARRIEZ,)	
)	
Third-Party Plaintiff,)	CASE NO. SX-13-CV-152
)	
vs.)	ACTION FOR DAMAGES
)	
FATHI YUSUF,)	JURY TRIAL DEMANDED
)	
Third-Party Defendant.)	

**UNITED CORPORATION'S RESPONSES TO WADDA CHARRIEZ'S
FIRST INTERROGATORIES TO PLAINTIFF UNITED CORPORATION**

Plaintiff/Counterclaim Defendant UNITED CORPORATION ("United") hereby provides its Responses to Wadda Charriez's First Interrogatories as follows:

GENERAL OBJECTIONS

(1) United objects to Interrogatory Nos. 1 and 2 to the extent they may impose obligations different from or in addition to those required under the Virgin Islands Rules of Civil Procedure.

(2) United objects to Interrogatory Nos. 1 and 2 to the extent that they use the words “any” and “all” as being overly broad, unduly burdensome, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

(3) United objects to Interrogatory Nos. 1 and 2 to the extent that they seek information which is protected by the attorney-client privilege or work-product doctrine, including information prepared in anticipation of litigation, or for trial, by or on behalf of United or relating to mental impressions, conclusions, opinions, or legal theories of its attorneys or representatives, or any other applicable privilege or doctrine under federal or state statutory, constitutional or common law. United’s answers shall not include any information protected by such privileges or doctrine, and documents or information inadvertently produced which includes such privileged information shall not be deemed a waiver by United of such privilege or doctrine.

(4) United objects to Interrogatory Nos. 1 and 2 to the extent that they seek information and documents concerning any matter that is irrelevant to the claims or defenses of any party to this action, and not reasonably calculated to lead to the discovery of admissible evidence.

(5) United objects to Interrogatory Nos. 1 and 2 to the extent they use terms or phrases that are vague, ambiguous, or undefined. United’s response to such requests will be based upon their understanding of the request.

(6) United objects to Interrogatory Nos. 1 and 2 to the extent that they seek documents or information not in the possession, custody or control of United, on the grounds that it would subject it to undue burden, oppression and expense, and impose obligations not required by the Virgin Islands Rules of Civil Procedure.

(7) United has not completed either its discovery or preparation for trial of this matter. Accordingly, United's response to Interrogatory Nos. 1 and 2 is made without prejudice to United's right to make any use of, or proffer at any hearing or at trial, and are based only upon information presently available. If any additional, non-privileged, responsive documents are discovered, the Interrogatories will be supplemented to the extent that supplementation may be required by the Virgin Islands Rules of Civil Procedure.

(8) United objects to Interrogatory Nos. 1 and 2 to the extent they are compound and not single interrogatories. Hence, the Interrogatories should be counted as more than single interrogatories such that when all of the subparts are included together with other interrogatories they may exceed the 50 Interrogatories agreed upon by the parties.

RESPONSES TO INTERROGATORIES

Interrogatory No. 1: Please describe any conversation you had with Wally Hamed, representing his father, Mohammad Hamed's, interests in the Hamed-Yusef partnership pursuant to a power of attorney, or the Hamed-Yusef partnership, that authorized the current lawsuit, *United Corporation v. Wadda Charriez*, Superior Court of the Virgin Islands, Division of St. Croix No. 2013-CB-152. In addition to the description of the conversation, please provide the date, the approximate length of time the discussion too (sic), where the discussion took place and who was present.

Response: No such discussions took place.

Interrogatory No. 2: Please describe what process was in place during the timeframe from 2006 through 2012 that allowed employees of the United Corporation d/b/a Plaza Extra to record time for work activities conducted outside of the Plaza Extra stores, such as making bank deposits.

Response: Employees of United were to enter their time through a hand recognition device which scanned their hands as a means of recording their punch-in and punch-out times. If there were work outside of the office that was authorized by a supervisor, the employee would ask the Office Manager to manually override the time clock entries if that were necessary to record time for any work done outside the office.

Respectfully submitted,

DUDLEY, TOPPER AND FEUERZEIG, LLP

DATED: May 15, 2018

By:



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CERTIFICATE OF SERVICE

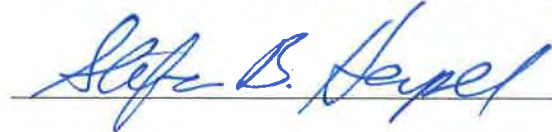
I hereby certify that on this 15th day of May, 2018, I caused the foregoing **UNITED CORPORATION'S RESPONSE TO WADDA CHARRIEZ'S FIRST INTERROGATORIES** to be served upon the following via e-mail:

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