

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

WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,)	
)	
)	
Plaintiff/Counterclaim Defendant,)	CIVIL NO. SX-12-CV-370
v.)	
)	
FATHI YUSUF and UNITED CORPORATION,)	ACTION FOR INJUNCTIVE RELIEF, DECLARATORY JUDGMENT, AND
)	PARTNERSHIP DISSOLUTION, WIND UP, AND ACCOUNTING
Defendants/Counterclaimants,)	
v.)	
)	
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and PLESSEN ENTERPRISES, INC.,)	
<u>Additional Counterclaim Defendants.</u>)	Consolidated With
WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,)	
)	
)	CIVIL NO. SX-14-CV-287
Plaintiff,)	
v.)	ACTION FOR DAMAGES AND DECLARATORY JUDGMENT
)	
UNITED CORPORATION,)	
)	
)	
Defendant.)	
WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,)	CIVIL NO. SX-14-CV-278
)	
)	
Plaintiff,)	ACTION FOR DEBT AND CONVERSION
v.)	
)	
FATHI YUSUF,)	
)	
)	
Defendant.)	
FATHI YUSUF and UNITED CORPORATION,)	CIVIL NO. ST-17-CV-384
)	
)	
Plaintiffs,)	ACTION TO SET ASIDE FRAUDULENT TRANSFERS
v.)	
)	
THE ESTATE OF MOHAMMAD HAMED, Waleed Hamed as Executor of the Estate of Mohammad Hamed, and THE MOHAMMAD A. HAMED LIVING TRUST,)	
)	
)	
Defendants.)	
)	

**SUPPLEMENTAL RESPONSES
TO HAMED'S DISCOVERY AS TO
INTERROGATORY NO. 21,
REQUEST TO ADMIT NO. 22 AND
REQUEST FOR PRODUCTION OF DOCUMENTS NO. 13**

Defendant/Counterclaimants Fathi Yusuf ("Yusuf") and United Corporation ("United")(collectively, the "Defendants") through their attorneys, Dudley, Topper and Feuerzeig, LLP, hereby provide their Supplemental Responses to Hamed's Interrogatory No. 21, Request to Admit No. 22 and Request for Production of Documents No. 13 (collectively the "Discovery") as follows:

GENERAL OBJECTIONS

Defendants incorporate by reference as if fully set forth herein verbatim their General Objections as set forth in their initial Responses and Objections to the Discovery filed on May 15, 2018.

SUPPLEMENTAL RESPONSES TO DISCOVERY

Interrogatory 21 of 50:

Interrogatory 21 of 50 relates to Claim No. H-142 (old Claim No. 490): "Half acre in Estate Tutu," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.

With respect to Claim No. H-142, state in detail how this half acre in Estate Tutu was purchased and what funds were used, the source of those funds and any discussions or agreements about the

funds or the purchase, with reference to all applicable documents, communications and witnesses.

Supplemental Response:

Defendants show that all documents relating to the purchase of the half acre in Estate Tutu are those documents, which have already been provided in this case including the Warranty Deed and the First Priority Mortgage. Further responding, Defendants show that Mr. Yusuf is out of the country until August 18, 2018 and to the extent that any additional information is required of him, Defendants are unable to provide that information at this time, but will readily supplement as soon as he is available.

Request to Admit 22 of 50:

Requesting to admit number 22 of 50 relates to Claim H-142 (old Claim No. 490) as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master as "Half acre in Estate Tutu."

Admit or deny that the Partnership (or Hamed and Yusuf) did provide the funds for the purchase of this land referenced Claim H-142, "Half acre in Estate Tutu," by using income from the Plaza Extra stores.

Supplemental Response:

Admit.

RFPDs 13 of 50:

Request for the Production of Documents, 13 of 50, relates to H-142 (old Claim No. 490): "Half acre in Estate Tutu."

With respect to H-142, please provide all documents which relate to this entry – particularly (but not limited to) all underlying documents relating to the source of funds for the purchase of this property if it was other than income from the stores.

Supplemental Response:

Defendants show that all documents in their possession, custody or control have already been produced (warranty deed, first priority mortgage and deed in lieu of foreclosure with accompanying tax clearance letter from Mohammad Hamed). Further responding, Defendants show that there are no documents responsive to this request to the extent it seeks documents reflecting sources of funds for the purchase other than income from the stores.

DUDLEY, TOPPER AND FEUERZEIG, LLP

DATED: July 19th, 2018

By: 

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*Attorneys for Fathi Yusuf and United
Corporation*

CERTIFICATE OF SERVICE

It is hereby certified that on this 19th day of July, 2018, I caused the foregoing a true and exact copy of the foregoing **SUPPLEMENTAL RESPONSES TO HAMED'S INTERROGATORY NO. 21, REQUEST TO ADMIT NO. 22 AND REQUEST FOR PRODUCTION OF DOCUMENTS NO. 13** to be served upon the following via Case Anywhere docketing system:

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