**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

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| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2012-cv-370** |
| *Plaintiff/Counterclaim Defendant*, |  |
| vs.  **FATHI YUSUF** and **UNITED CORPORATION** | **ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF** |
|  |  |
| *Defendants and Counterclaimants*.  vs.  **WALEED HAMED, WAHEED** **HAMED, MUFEED HAMED, HISHAM HAMED,** **and PLESSEN ENTERPRISES, INC.**,  *Counterclaim Defendants*, | JURY TRIAL DEMANDED |
|  | Consolidated with |
| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2014-CV-287** |
|  |  |
| *Plaintiff*,  vs. | **ACTION FOR DECLARATORY**  **JUDGMENT** |
| **UNITED CORPORATION,** | JURY TRIAL DEMANDED |
| *Defendant.*  *­­­­­­*­­  **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED,  *Plaintiff,*  vs.  **FATHI YUSUF**,  *Defendant.* | Consolidated with  **Case No.: SX-2014-CV-278**  **ACTION FOR DEBT AND CONVERSION**  JURY TRIAL DEMANDED |
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**NOTICE OF VIDEOTAPED DEPOSITION**

**PLEASE TAKE NOTICE** that pursuant to the *Order* of the Special Master dated July 12, 2018, on August 8, 2018 at 11 a.m., pursuant to V.I.R. Civ. P. 30(b)(6), Plaintiff's counsel will take the limited videotaped deposition of a designated representative of Defendant United Corporation with regard to the topics set forth in “**Exhibit A**” -- solely as to Hamed’s Claim H-142 -- at his offices on 2132 Company Street, Christiansted, VI. Hamed understands and stipulates that the time spent in this deposition will be deducted from the total deposition time of this Defendant allowed pursuant to ‘Part B’ of the January 29, 2018, *Plan and Scheduling Order*.

**Dated:** July 20, 2018 A

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 20th day of July, 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).

A

**EXHIBIT A**

**DEPOSITION TOPICS**

1. Hamed Claim H-142 (Tutu Land)
2. The funds used to purchase the land described as:

Parcel No. 2-4 Rem. Estate Charlotte Amalie

No. 3 New Quarter, *St.* Thomas, U.S. Virgin Islands

consisting of 0.536 acre, more or less, as shown on

OLG Map No. D9-7044-T002, dated April 10, 2002

hereinafter referred to as the “Land”.

1. The source and how the funds were generated, and taxes paid on those funds
2. The methods and means used to skim funds to avoid taxes
3. The methods and means used to purchase other property with skimmed funds.
4. The methods and means used to transfer the funds used to purchase the Land
5. The persons directing the obtaining, use and payment of these funds.
6. Negotiations surrounding the purchase of the Land.
7. The offer for the Land.
8. The acceptance of the offer for the Land
9. The preparation of documents for the transfer of the Land.
10. The Closing on the Land.
11. The documents relating to the Land.
12. The purchase of the large adjacent parcel of the Land. (“Large Adjacent Parcel”)
13. The source and how the funds were generated, and taxes paid on those funds
14. The methods and means used to transfer the funds used to purchase the Large Adjacent Parcel
15. The persons directing the obtaining, use and payment of these funds.
16. Negotiations surrounding the purchase of the Large Adjacent Parcel.
17. The offer for the Large Adjacent Parcel.
18. The acceptance of the offer for the Large Adjacent Parcel
19. The preparation of documents for the transfer of the Large Adjacent Parcel.
20. The Closing on the Large Adjacent Parcel.
21. The documents relating to the Large Adjacent Parcel.
22. The Mortgage and Note in Favor of United Corporation on the Land (the “Mortgage”)
23. The source and how the funds were generated for United to loan or pay consideration to the Partnership or Plessen for the Note and Mortgage, and taxes paid on those funds
24. The methods and means used to transfer the funds used to purchase the Mortgage
25. The persons directing the obtaining, use and payment of these funds.
26. Negotiations surrounding the Mortgage.
27. The offer for the Mortgage.
28. The acceptance of the offer for the Mortgage
29. The preparation of documents for the Mortgage and Note.
30. The Deed in Lieu in Favor of United Corporation on the Land (the “Mortgage”)
31. The source and how the funds were generated for United to loan or pay consideration to the Partnership or Plessen for the Note and Deed in Lieu, and taxes paid on those funds
32. The methods and means used to transfer the funds used to purchase the Deed in Lieu
33. The persons directing the obtaining, use and payment of these funds.
34. Negotiations surrounding the Deed in Lieu.
35. The offer for the Deed in Lieu.
36. The acceptance of the offer for the Deed in Lieu
37. The preparation of documents for the Deed in Lieu and Note.
38. The intended use of the Land and Large Adjacent Parcel
39. The Criminal Action and its Effects
40. On the use of the Land
41. On the funds available
42. On the transferring of interests in property
43. On United
44. On Plessen
45. On the grocery stores
46. On the Tutu Store
47. The involvement of individuals on the purchase of the Land, mortgage and Deed in Lieu
48. Fathi Yusuf
49. Mohammad Hamed
50. Waleed Hamed
51. Mike Yusuf
52. Counsel
53. CPA’s and Accountants
54. Title Searchers
55. Title Insurance Providers
56. Plessen Enterprises. Inc. at the time of the purchase of the Land, mortgage and Deed in Lieu
57. United Corporation at the time of the purchase of the Land, mortgage and Deed in Lieu
58. The Partnership at the time of the purchase of the Land, mortgage and Deed in Lieu
59. Accounting Practices at the time of the purchase of the Land, mortgage and Deed in Lieu
60. Banking Practices at the time of the purchase of the Land, mortgage and Deed in Lieu
61. Legal work being done at the time of the purchase of the Land, mortgage and Deed in Lieu
62. The practices surrounding Fathi Yusuf being “in charge” of the office, finances and decision-making at the time of the purchase of the Land, mortgage and Deed in Lieu
63. The practices surrounding Fathi Yusuf being “in charge” of the office, finances and decision-making regarding the Land