

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, MUFEEED  
HAMED, HISHAM HAMED, and PLESSEN  
ENTERPRISES, INC.,**

*Counterclaim Defendants,*

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

vs.

**UNITED CORPORATION,** *Defendant.*

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

vs.

**FATHI YUSUF,** *Defendant.*

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**FATHI YUSUF,** *Plaintiff,*

vs.

**MOHAMMAD A. HAMED TRUST,** *et al,*

*Defendants.*

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**KAC357 Inc.,** *Plaintiff,*

vs.

**HAMED/YUSUF PARTNERSHIP,**

*Defendant.*

**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**

Consolidated with

**Case No.: ST-18-CV-219**

**NOTICE OF VIDEOTAPED DEPOSITIONS**

**PLEASE TAKE NOTICE** that pursuant to *Rules V.I. R. Civ. P. 30(a), 30(b)(6)* and 45, the Plaintiff (Hamed) will take the videotaped depositions of the following persons and entities:

Hamed will take the depositions of the following individuals and entities *seriatim*, by topic, rather than by individual witness—beginning Tuesday January 21, 2019 at 10:00 a.m. The location will be Lower Conference Room, Law Office of Joel H. Holt, 2132 Company Street, Christiansted, USVI. (340) 773-8709.

1. The topics will be as follows:

In the following order, the initial deposition to be a Hamed claim H-150.

a. Tuesday:

H-150 United Shopping Center's Gross Receipt Taxes (B-1)

Y-05 Reimburse United for Gross Receipt Taxes (B-1)

H-160 United Shopping Centers gross receipt taxes (B-1)

b. Wednesday:

Y-08 Water Revenue Owed United (B-1)

H-142 Half Acre in Estate Tutu (B-1)

c. Thursday:

Y-09 Unreimbursed Transfers to United (B-1)

Y-07 Ledger Balance Owed to United (B-1)

H-165 Outstanding debts identified by Yusuf (B-1)

Witnesses will be available on a one hour call notice if they are not physically present. All witnesses will be provided a copy of this Notice by counsel no later than January 5, 2020.

2. The individuals and entities that must be made available by the parties will be:

**WALLY HAMED**

**FATHI YUSUF**

**MAFI HAMED**

**MIKE YUSUF**

**SHAWN HAMED**

**NEJEH YUSUF**

**WILLIE HAMED**

**YUSUF YUSUF**

**JOHN GAFFNEY**

**UNITED CORPORATION**

**THE YUSUF/HAMED PARTNERSHIP (Liquidating Partner)**

The entity deponents will produce as many representatives with knowledge as necessary to give the most informed response to each topic -- representatives who have apprised themselves of the full knowledge of the entity regarding the topic. As to each topic, each such representative will be asked the *voir dire* question: "Have you been informed by the entity prior to this testimony regarding Claim \_\_\_, that you were to have been apprised of, and be ready to testify as to the full knowledge of the entity regarding this topic?"

Pursuant to V.I. R. Civ. P. 30(b)(2) and 30(b)(6), as well as V.I. R. Civ. P. 34, the deponents shall bring the following documents in their possession or under their control to the depositions:

1. As to the Partnership and United, all documents necessary to allow full and complete testimony on the topics set forth above.

2. As to the individuals, all documents necessary to testify as to the following, although the deposition will be in no way limited to these topics -- they are merely presented to allow each witness to prepare more fully:

**Dated:** December 6, 2019

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

**Carl J. Hartmann III, Esq.**  
*Co-Counsel for Plaintiff*  
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**Joel H. Holt, Esq.**  
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Tele: (340) 773-8709

### CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of December, 2018, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

**Hon. Edgar Ross**

Special Master  
edgarrossjudge@hotmail.com

**Gregory H. Hodges**

**Charlotte Perrell**

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Carl J. Haddock

### CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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



Carl J. Haddock