

**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,

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

vs.

UNITED CORPORATION, *Defendant.*

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

vs.

FATHI YUSUF, *Defendant.*

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*

Defendants.

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

PLEASE TAKE NOTICE that pursuant to *Rules V.I. R. Civ. P. 30(a), 30(b)(6)* and 45, the Plaintiff (Hamed) and Defendants/Counterclaimants (Yusuf and United Corporation)(collectively Hamed , Yusuf and United will be referred to as the “Parties”) will take the videotaped depositions of the following persons 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:

A. Tuesday:

i. Morning

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)

ii. Afternoon

Y-08 Unreimbursed Transfers to United (B-1)

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

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

B. Wednesday:

i. Morning

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

ii. Afternoon

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

a. Thursday:

Reserved for additional time if necessary.

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.

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

WALEED HAMED

FATHI YUSUF

MUFEEED HAMED

MIKE YUSUF

HISHAM HAMED

NEJEH YUSUF

WAHEED 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. All documents reasonably anticipated to be necessary to allow full and complete testimony on the topics set forth above.

Dated: January 10, 2020



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DUDLEY NEWMAN FEUERZEIG LLP

DATED: January 10, 2020

By: /s/Charlotte K. Perrell
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Attorneys for Fathi Yusuf and United Corporation

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

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DNF

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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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

