

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,

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

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

vs.

UNITED CORPORATION, *Defendant.*

Consolidated with

Case No.: ST-17-CV-384

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.

Consolidated with

Case No.: ST-18-CV-219

KAC357 Inc., *Plaintiff,*

vs.

HAMED/YUSUF PARTNERSHIP,
Defendant.

SECOND AMENDED JOINT DISCOVERY AND SCHEDULING PLAN

THE PARTIES to the above-captioned civil action, in accordance with Virgin Islands Rules of Civil Procedure 16 and 26, and the instructions of the Honorable Edgar D. Ross (the “Master”) agree and stipulate to the following discovery and scheduling plan for incorporation into a Case Management Order.

I. Current Status

On December 1, 2018, the Special Master entered an Order (the “December 1, 2018 Order”) following a telephonic conference with counsel as to the status of the claims. *See Exhibit A – December 1, 2018 Order*. The December 1, 2018 Order amended the discovery plan agreed to by the Parties and entered by the Master on January 29, 2018, as modified by Order dated August 6, 2018.

On October 5, 2019, the Master entered the latest amended discovery plan agreed to and submitted by the Parties. *See Exhibit B – October 5, 2019 Amended Scheduling Order*.

Therein, the claims were divided into two groups. Group A consisted of claims by Hamed that required the input of Accountant John Gaffney and Group B were party claims that did not require input from Gaffney. Of the Group B claims, they were further divided into sub-categories: B-1 and B-2. The B-1 Claims involved matters that did not need expert discovery and the B-2 Claims were those that may need expert testimony.

In March 2020, the COVID19 Pandemic impacted much of the progress and delayed adherence to the October 5, 2019 Amended Scheduling Order. Nonetheless, the parties submitted briefs and motions, undertook remote depositions, participated in remote interlocutory hearings and the Master has entered rulings as to various B-1 claims. The status of the B-1 Claims is set forth below and is nearing completion. As to the remaining B-2 Claims, new deadlines have been

provided that maintain the same cadence and sequence as originally contemplated in the prior Amended Scheduling Order, albeit it with new deadlines.

II. Remaining “Part B” Claims:

The remaining Part B Claims will continue to be addressed in two phases.

A. Part B(1) Claims

These claims consist of the following:

- Y-05 Reimburse United for Gross Receipt Taxes (B-1)
- Y-07 Ledger Balance Owed to United (B-1)
- Y-08 Water Revenue Owed United (B-1)
- Y-09 Unreimbursed Transfers to United (B-1)
- H-142 Half Acre in Estate Tutu (B-1)
- H-150 United Shopping Center’s Gross Receipt Taxes (B-1)
- H-160 United Shopping Centers gross receipt taxes (B-1)
- H-165 Outstanding debts identified by Yusuf (B-1)

1. Current Status:

Of the B(1) claims listed above, the Court has issued various rulings. Only two remain incomplete.

- a. Y-8 Claim – Water Revenue Owed to United – An interlocutory hearing on this matter was recently held and the parties have submitted their proposed findings to the Master for his consideration and ruling.
- b. H-142 Half Acre in Estate Tutu – The Master has determined through prior rulings that this claim requires an evidentiary hearing. The parties and counsel are coordinating for a proposed hearing date. As COVID19 protocols remain in place, counsel is attempting to schedule a hearing for a point in which an in-person hearing can

take place. After the hearing, the parties will submit their proposed findings of fact and conclusions of law to the Master for a ruling.

B. Part B(2) Claims

These claims consist of the following:

- Y-10 Past Partnership Withdrawals (B-2)
- Y-11 Lifestyle Analysis (B-2)
- Y-12 Foreign Accounts and Jordanian Property (B-2)
- ~~H-33 Merrill Lynch Accounts (B-2)~~¹
- H-146 Imbalance in Credit Card Points (B-2)
- H-151 Checks written to Fathi Yusuf for personal use (B-2)
- H-162 Claims based on monitoring reports/accounting 2007-2012 (B-2)
- ~~H-163 Loss of Assets as a result of Wrongful Dissolution~~²

1. Schedule for Remaining Discovery As to the Part B(2) Claims:

All written interrogatories, requests for production of documents, and requests for admissions have been exchanged between the parties as to these claims. Any motions to compel will be filed by August 16, 2021. Remaining fact witness depositions, including depositions of non-parties, taken for purposes of discovery and/or to preserve testimony for trial, shall be completed on a per-claim basis as agreed between the parties before November 15, 2021.

2. Schedule for Disposition of Part B(2) Claims:

The parties will each file motions for summary judgment on their affirmative remaining Part B(2) Claims by January 15, 2022. Claims for which the Master feels an evidentiary hearing is deemed necessary will be scheduled to occur promptly after denial of a summary judgment motion as the Master, the parties and counsel will be familiar and well versed on the issues, rather than waiting until a later date.

¹ This claim was stricken per Order dated July 7, 2020.

² This claim has already been the subject of briefing and an interlocutory hearing and is currently pending before the Master.

a. Expert Discovery and Disposition of remaining Part B(2) Claims:

The parties anticipate that following the close of the fact discovery of the Part B(2) claims, that many will require expert testimony and thus, expert discovery will be necessary.

The party asserting the claim(s) shall serve notices identifying all of his expert witnesses, and said expert witnesses' curriculum vitae and written reports, not later than February 15, 2022.

The party defending the claim(s) shall serve notices identifying all of their expert witnesses, and said expert witnesses' curriculum vitae and written reports, not later than March 15, 2022.

All expert witness depositions, for purposes of discovery and to preserve testimony for trial, shall be completed not later than April 30, 2022.

All motions to compel, for sanctions, or for protective orders with respect to expert discovery, shall be filed and served not later than May 15, 2022.

The parties shall jointly contact the Master to attempt an informal resolution of any discovery disputes prior to filing expert discovery motions.

Daubert/Kuhmo motions shall be filed and served not later than June 15, 2022.

b. Disposition of Claims After Expert Testimony:

As to the remaining claims that exist following the close of the expert discovery phase and *Daubert/Kuhmo* motions, to the extent any remaining claims may be disposed of through a summary judgment process, the parties will each file motions for summary judgment on their affirmative remaining Part B(2) claims by July 15, 2022. Claims for which the Master feels an evidentiary hearing is deemed necessary will be scheduled to occur promptly after any denial of a

summary judgment motion as the Master, the parties and counsel will be familiar and well versed in the topic, rather than waiting until a later date.

III. Interlocutory Hearings

To be efficient with the Master's and parties' time and resources, in the event that certain matters require an evidentiary hearing for the Part B(1) and (2) claims, the parties will attempt to group the claims to be heard at any single hearing with overlapping issues, documents and witnesses. No later than 10 days prior to any scheduled Interlocutory Hearing, all motions in limine and V.I. Rule of Evidence 104 motions shall be filed and served.

The parties ask the Master to tentatively schedule³ the first of these for the already briefed H-142 (half-acre at Tutu) for a full, in person hearing on Wednesday, September 8, 2021. If this is not convenient, other suggested dates are: August 30, September 1 or September 2, 2021.

IV. Remaining Part A Claims:

A. Claims to John Gaffney. With regard to the Part A Claims:

It should be noted that the Gaffney (Part A) process involved the Court less than the full-briefing (Part B) process – and thus 30 claims were added to the original 101 Part A claims. Thus, the “starting figure” for Part A claims was actually 131.

1. 101 original claims were designated as Part A Claims requiring a report from John Gaffney.
2. 30 Part B claims were moved to Gaffney / Part A.
3. Thus, **a total of 131 claims** are being submitted to Gaffney.
4. To date Gaffney has completed 30 claims.

³ Yusuf and United believe that this date is available, and thus, seek to hold it as a possible hearing date. Yusuf and United will be able to confirm their availability for these dates in July.

5. To date, Hamed has conceded approximately \$536,556, and Yusuf \$44,619.28.
6. Hamed has removed 6 other claims unilaterally.
7. 96 claims remain to be submitted to Gaffney.

While the process is slow, it has already diverted 30 of the original Part B claims from the need for full consideration by the Court. Therefore, the parties request that the Master allow it to continue at the current pace and to provide a status report every ninety (90) days to alert the Master if there have been any unforeseen delays.

If it appears after the submission of any particular report by Gaffney that the claim to which it pertains remains an open issue and is not resolved, the parties will confer to determine if any further discovery, including possible expert discovery, is needed and if not, then the claim will be briefed via a motion for summary judgment within 90 days of completion of the Gaffney claims – and if the Master feels an evidentiary hearing is deemed necessary it will be scheduled to occur thereafter.

V. Final Accounting Report and Ultimate Distribution Recommendation

The parties are undertaking to develop a comprehensive template for a Final Accounting Report and Ultimate Distribution Recommendation based upon the various interim rulings made by the Master. The parties anticipate they will stipulate to the format of the template and such template can be used by the Master to reflect the accounting allocations between the parties as determined by his various interlocutory Orders with his Final Accounting Report and Ultimate Distribution Recommendation submitted to Judge Brady.

Respectfully submitted,

LAW OFFICES OF JOEL H. HOLT

DATED: June 11, 2021

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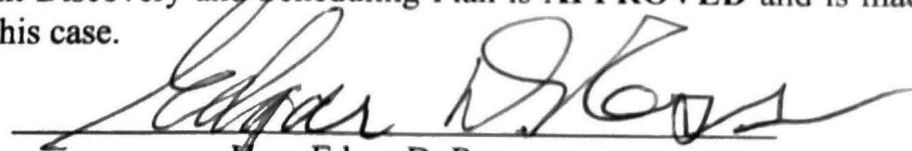
DATED: June 11, 2021

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Attorneys for Fathi Yusuf and United Corporation

The foregoing Amended Joint Discovery and Scheduling Plan is **APPROVED** and is made the Case Management Order in this case.

Dated: June 14th, 2021



Hon. Edgar D. Ross
Master

CERTIFICATE OF SERVICE

It is hereby certified that on this 11th day of June, 2021, I served a true and correct copy of the foregoing **Second Amended Joint Discovery and Scheduling Plan**, which complies with the page and word limitations set forth in Rule 6-1(e), via e-mail addressed to:

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/s/Charlotte K. Perrell

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
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Plaintiff/Counterclaim Defendant,

vs.

FATHI YUSUF and **UNITED CORPORATION**

Defendants and Counterclaimants.

vs.

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Counterclaim Defendants,

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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.

ORDER

THIS MATTER, having come on before the Special Master in a telephonic conference on November 29, 2018, on the joint motion of the parties. It is hereby

ORDERED:

1. Due to the progress being made with regard to the Part A claims (Gaffney review) and the Special Master having allowed the movement of Part B claims to the Part A process, adjustments to the original Scheduling Order are necessary.
2. The Scheduling Order agreed to by the parties and entered by the Special Master on January 29, 2018, as modified by Order dated August 6, 2018, is hereby amended.
3. The parties will work together and with John Gaffney to complete Gaffney's review of and reporting on the Part A claims by Thursday, August 29, 2019.
4. A telephonic status conference is hereby scheduled for 10:00 a.m. on Friday, August 30, 2019 to review that progress and discuss further amending the Scheduling Order to provide for the completion of the then outstanding Part A and Part B claims, which will include the discovery and briefing schedule for any of those claims that remain.
5. The following Part B claims requiring expert discovery will be moved to the Part A *schedule* in that they will be dealt with after completion of the Part A process provided above:

Y-05	Reimburse United for Gross Receipt Taxes
Y-06	Black Book Balance Owed United
Y-07	Ledger Balance Owed United
Y-08	Water Revenue Owed United
Y-09	Unreimbursed Transfers from United
Y-10	Past Partnership Withdrawals - Receipts
Y-11	Lifestyle Analysis

- H-33 Merrill Lynch Accounts
- H-142 Half acre in Estate Tutu
- H-146 Imbalance in credit card points
- H-150 United Shopping Center's gross receipt taxes
- H-151 Checks written to Fathi Yusuf for personal use
- H-160 United Shopping Center's gross receipt taxes
- H-162 Claims based on monitoring reports/accounting 2007-2012
- H-165 In Yusuf's Accounting and Proposed Distribution Plan filing on September 30, 2016, Yusuf stated that "[t]here are Debts totaling \$176,267.97, which must be paid prior to any distribution of the remaining Partnership Assets to the Partners." (Footnote omitted)
This is an unclear accounting entry.

Dated: Dec. 1, 2018


Hon. Edgar D. Ross, Special Master

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vs.

FATHI YUSUF, Defendant.

FATHI YUSUF, Plaintiff,

vs.

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Defendants.

KAC357 Inc., Plaintiff,

vs.

HAMED/YUSUF PARTNERSHIP,

Defendant.

JOINT DISCOVERY AND SCHEDULING PLAN

THE PARTIES to the above-captioned civil action, in accordance with Virgin Islands Rules of Civil Procedure 16 and 26, and the instructions of the Honorable Edgar D. Ross (the “Master”) agree and stipulate to the following discovery and scheduling plan for incorporation into a Case Management Order.

I. Current Status

On December 1, 2018, the Special Master entered an Order (the “December 1, 2018 Order”) following a telephonic conference with counsel as to the status of the claims. *See Exhibit A – December 1, 2018 Order.* The December 1, 2018 Order amended the discovery plan agreed to by the Parties and entered by the Master on January 29, 2018, as modified by Order dated August 6, 2018.

After lengthy discussions as to how to best proceed through the remaining claims so as to remain efficient, the parties believe the claims and their processing should be addressed as set forth herein.

II. Remaining “Part B”¹ Claims:

The sixteen (16) remaining Part B Claims will be addressed in two phases.

A. Part B(1) Claims

These claims consist of the following:

- Y-05 Reimburse United for Gross Receipt Taxes (B-1)
- Y-07 Ledger Balance Owed to United (B-1)

¹ The parties divided the claims into two tracks—Part A and Part B. The Part A claims were those claims that John Gaffney was needed to provide an accounting explanation and originally were identified as claims H-41 thru H-141. An additional 30 claims were moved to the Part A track, for a total of 131 claims. The Part B claims are the remaining claims that do not require Gaffney input or explanation. Summary judgment motions concerning 5 Part B claims have been submitted to the Master. Of the remaining Part B claims, 8 Part B(1) claims do not require expert testimony and will be addressed next. The final 8 Part B(2) claims may require expert testimony and will be addressed last.

Y-08 Water Revenue Owed United (B-1)
Y-09 Unreimbursed Transfers to United (B-1)
H-142 Half Acre in Estate Tutu (B-1)
H-150 United Shopping Center's Gross Receipt Taxes (B-1)
H-160 United Shopping Centers gross receipt taxes (B-1)
H-165 Outstanding debts identified by Yusuf (B-1)

1. Schedule for remaining discovery as to the Part B(1) Claims:

All written interrogatories, requests for production of documents, and requests for admissions have been exchanged between the parties as to these claims. Any motions to compel will be filed by October 15, 2019. Remaining fact witness depositions, including depositions of non-parties, taken for purposes of discovery and/or to preserve testimony for trial, shall be completed on a per-claim basis as agreed between the parties before February 15, 2020.

2. Schedule for Disposition of Part B(1) Claims:

The parties will each file motions for summary judgment on their affirmative remaining Part B(1) Claims by April 1, 2020. Claims for which the Master feels an evidentiary hearing is deemed necessary will be scheduled to occur promptly after denial of a summary judgment motion as the Master, the parties and counsel will be familiar and well versed on the issues, rather than waiting until a later date.

B. Part B(2) Claims

These claims consist of the following:

Y-10 Past Partnership Withdrawals (B-2)
Y-11 Lifestyle Analysis (B-2)
Y-12 Foreign Accounts and Jordanian Property (B-2)
H-33 Merrill Lynch Accounts (B-2)
H-146 Imbalance in Credit Card Points (B-2)
H-151 Checks written to Fathi Yusuf for personal use (B-2)
H-162 Claims based on monitoring reports/accounting 2007-2012 (B-2)
H-163 Loss of Assets as a result of Wrongful Dissolution

1. Schedule for Remaining Discovery As to the Part B(2) Claims:

All written interrogatories, requests for production of documents, and requests for admissions have been exchanged between the parties as to these claims. Any motions to compel will be filed by July 1, 2020. Remaining fact witness depositions, including depositions of non-parties, taken for purposes of discovery and/or to preserve testimony for trial, shall be completed on a per-claim basis as agreed between the parties before February 15, 2021.

2. Schedule for Disposition of Part B(2) Claims:

The parties will each file motions for summary judgment on their affirmative remaining Part B(1) Claims by April 1, 2021. Claims for which the Master feels an evidentiary hearing is deemed necessary will be scheduled to occur promptly after denial of a summary judgment motion as the Master, the parties and counsel will be familiar and well versed on the issues, rather than waiting until a later date.

a. Expert Discovery and Disposition of remaining Part B(2) Claims:

The parties anticipate that following the close of the fact discovery of the Part B(2) claims, that many will require expert testimony and thus, expert discovery will be necessary.

The party asserting the claim(s) shall serve notices identifying all of his expert witnesses, and said expert witnesses' curriculum vitae and written reports, not later than April 15, 2021

The party defending the claim(s) shall serve notices identifying all of their expert witnesses, and said expert witnesses' curriculum vitae and written reports, not later than May 15, 2021.

All expert witness depositions, for purposes of discovery and to preserve testimony for trial, shall be completed not later than June 15, 2021.

All motions to compel, for sanctions, or for protective orders with respect to expert discovery, shall be filed and served not later than July 15, 2021.

The parties shall jointly contact the Master to attempt an informal resolution of any discovery disputes prior to filing expert discovery motions.

Daubert/Kuhmo motions shall be filed and served not later than August 15, 2021.

b. Disposition of Claims After Expert Testimony:

As to the remaining claims that exist following the close of the expert discovery phase and *Daubert/Kuhmo* motions, to the extent any remaining claims may be disposed of through a summary judgment process, the parties will each file motions for summary judgment on their affirmative remaining Part B(2) claims by September 1, 2021. Claims for which the Master feels an evidentiary hearing is deemed necessary will be scheduled to occur promptly after any denial of a summary judgment motion as the Master, the parties and counsel will be familiar and well versed in the topic, rather than waiting until a later date.

III. Interlocutory Hearings

To be efficient with the Master's and parties' time and resources, in the event that certain matters require an evidentiary hearing for the Part B(1) and (2) claims, the parties will attempt to group the claims to be heard at any single hearing with overlapping issues, documents and witnesses. No later than 10 days prior to any scheduled Interlocutory Hearing, all motions in limine and V.I. Rule of Evidence 104 motions shall be filed and served.

IV. Remaining Part A Claims:

A. Claims to John Gaffney. With regard to the Part A Claims:

It should be noted that the Gaffney (Part A) process involved the Court less than the full-briefing (Part B) process – and thus 30 claims were added to the original 101 Part A claims. Thus, the “starting figure” for Part A claims was actually 131.

1. 101 original claims were designated as Part A Claims requiring a report from John Gaffney.
2. 30 Part B claims were moved to Gaffney / Part A.
3. Thus, **a total of 131 claims** are being submitted to Gaffney.
4. To date Gaffney has completed 30 claims.
5. To date, Hamed has conceded approximately \$536,556, and Yusuf \$44,619.28.
6. 101 claims remain to be submitted to Gaffney.

While the process is slow, it has already diverted 30 of the original Part B claims from the need for full consideration by the Court. Therefore, the parties request that the Master allow it to continue at the current pace and to provide a status report every ninety (90) days to alert the Master if there have been any unforeseen delays.

If it appears after the submission of any particular report by Gaffney that the claim to which it pertains remains an open issue and is not resolved, the parties will confer to determine if any further discovery, including possible expert discovery, is needed and if not, then the claim will be briefed via a motion for summary judgment within 90 days of completion of the 131 Gaffney claims – and if the Master feels an evidentiary hearing is deemed necessary it will be scheduled to occur thereafter.

V. Final Accounting Report and Ultimate Distribution Recommendation

The parties are undertaking to develop a comprehensive template for a Final Accounting Report and Ultimate Distribution Recommendation based upon the various interim rulings made by the Master. The parties anticipate they will stipulate to the format of the template and such template can be used by the Master to reflect the accounting allocations between the parties as determined by his various interlocutory Orders with his Final Accounting Report and Ultimate Distribution Recommendation submitted to Judge Brady.

Respectfully submitted,

LAW OFFICES OF JOEL H. HOLT

DATED: September 18, 2019

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Attorneys for Plaintiff/Counterclaim Defendant

DUDLEY NEWMAN FEUERZEIG LLP

DATED: September 18, 2019

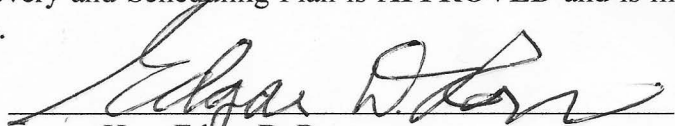
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Attorneys for Fathi Yusuf and United Corporation

Hamed v. Yusuf, et al.
Civil No. SX-12-cv-370
Page 8

The foregoing Amended Joint Discovery and Scheduling Plan is **APPROVED** and is made the Case Management Order in this case.

Dated: ~~September~~ ^{October 4th}, 2019



Hon. Edgar D. Ross
Master

CERTIFICATE OF SERVICE

It is hereby certified that on this 18th day of September, 2019, I served a true and correct copy of the foregoing **Joint Discovery and Scheduling Plan**, which complies with the page and word limitations set forth in Rule 6-1(e), via e-mail addressed to:

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/s/Charlotte K. Perrell

Exhibit A

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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

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.

ORDER

THIS MATTER, having come on before the Special Master in a telephonic conference on November 29, 2018, on the joint motion of the parties. It is hereby

ORDERED:

1. Due to the progress being made with regard to the Part A claims (Gaffney review) and the Special Master having allowed the movement of Part B claims to the Part A process, adjustments to the original Scheduling Order are necessary.
2. The Scheduling Order agreed to by the parties and entered by the Special Master on January 29, 2018, as modified by Order dated August 6, 2018, is hereby amended.
3. The parties will work together and with John Gaffney to complete Gaffney's review of and reporting on the Part A claims by Thursday, August 29, 2019.
4. A telephonic status conference is hereby scheduled for 10:00 a.m. on Friday, August 30, 2019 to review that progress and discuss further amending the Scheduling Order to provide for the completion of the then outstanding Part A and Part B claims, which will include the discovery and briefing schedule for any of those claims that remain.
5. The following Part B claims requiring expert discovery will be moved to the Part A *schedule* in that they will be dealt with after completion of the Part A process provided above:

Y-05	Reimburse United for Gross Receipt Taxes
Y-06	Black Book Balance Owed United
Y-07	Ledger Balance Owed United
Y-08	Water Revenue Owed United
Y-09	Unreimbursed Transfers from United
Y-10	Past Partnership Withdrawals - Receipts
Y-11	Lifestyle Analysis

- H-33 Merrill Lynch Accounts
- H-142 Half acre in Estate Tutu
- H-146 Imbalance in credit card points
- H-150 United Shopping Center's gross receipt taxes
- H-151 Checks written to Fathi Yusuf for personal use
- H-160 United Shopping Center's gross receipt taxes
- H-162 Claims based on monitoring reports/accounting 2007-2012
- H-165 In Yusuf's Accounting and Proposed Distribution Plan filing on September 30, 2016, Yusuf stated that "[t]here are Debts totaling \$176,267.97, which must be paid prior to any distribution of the remaining Partnership Assets to the Partners." (Footnote omitted)
This is an unclear accounting entry.

Dated: Dec. 1, 2018


Hon. Edgar D. Ross, Special Master

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