

**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,

Case No.: SX-2012-CV-370

**ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

JURY TRIAL DEMANDED

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

vs.

UNITED CORPORATION, *Defendant.*

Consolidated with

Case No.: SX-2014-CV-287

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

vs.

FATHI YUSUF, *Defendant.*

Consolidated with

Case No.: SX-2014-CV-278

FATHI YUSUF, *Plaintiff,*

vs.

MOHAMMAD A. HAMED TRUST, *et al,*

Defendants.

Consolidated with

Case No.: ST-17-CV-384

KAC357 Inc., *Plaintiff,*

vs.

HAMED/YUSUF PARTNERSHIP,

Defendant.

Consolidated with

Case No.: ST-18-CV-219

**NOTICE OF VIDEOTAPED DEPOSITIONS
NOVEMBER 9-11, 2021**

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 in the manner as previously agreed to by the parties *seriatim*, by topic, rather than by individual witness—beginning November 9th 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

Y-10 Past Partnership Withdrawals
Y-12 Foreign Accounts and Jordanian Property

ii. Afternoon

Y-11 Lifestyle Analysis

B. Wednesday:

i. Morning

H-151 Checks written to Fathi Yusuf for personal use

Afternoon

H-146 Imbalance in Credit Card Points

H-162 Claims on monitoring reports/accounting 2007-2012

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

MUFEED 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: September 7, 2021



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Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of September 2021, 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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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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

