

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff/Counterclaim Defendant,)	CIVIL NO. SX-12-CV-370
v.)	
)	
FATHI YUSUF and UNITED CORPORATION,)	ACTION FOR INJUNCTIVE
)	RELIEF, DECLARATORY
)	JUDGMENT, AND
Defendants/Counterclaimants,)	PARTNERSHIP DISSOLUTION,
v.)	WIND UP, AND ACCOUNTING
)	
WALEED HAMED, WAHEED HAMED,)	
MUFEED HAMED, HISHAM HAMED, and)	
PLESSEN ENTERPRISES, INC.,)	
)	
<u>Additional Counterclaim Defendants.</u>)	Consolidated With
WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff,)	CIVIL NO. SX-14-CV-287
v.)	
)	
UNITED CORPORATION,)	ACTION FOR DAMAGES AND
)	DECLARATORY JUDGMENT
)	
Defendant.)	
WALEED HAMED, as Executor of the)	
Estate of MOHAMMAD HAMED,)	
)	
Plaintiff,)	CIVIL NO. SX-14-CV-278
v.)	
)	
FATHI YUSUF,)	ACTION FOR DEBT AND
)	CONVERSION
)	
Defendant.)	

**YUSUF'S OPPOSITION TO HAMED MOTION TO COMPEL HAMED CLAIM H-151
– CHECKS WRITTEN TO FATHI YUSUF FOR PERSONAL USE**

Hamed's Current Motion to Compel Relating to Hamed H-151–Checks Written to Fathi Yusuf for Personal Use is premised upon Yusuf's alleged failure to fully respond to Hamed Interrogatory No. 38 and Requests to Produce No.s 4 and 40.

I. Interrogatory 38 Should Be Limited Consistent with the Master's September 5, 2021 Order and Responses Previously Served Are Sufficient, Hence, There is No Need to Further Compel

As to Interrogatory 38, Hamed seeks information as to all sources of deposits to Fathi Yusuf's personal accounts or transfers out of Fathi Yusuf's personal accounts. Interrogatory 18 also seeks information as to all deposits into and out of the United Corporation accounts.

A. Transfers To and From Fathi Yusuf's Accounts

The Master also has limited discovery to information in which the Partnership fund was the source of the income for the acquisition of assets. *See* September 5, 2021 Order, p. 20 (“...the Master finds the information sought...regarding assets where the Partnership fund was not the source for the acquisition of such assets irrelevant.”). This interrogatory seeks information relating to income sources that are unrelated to the Partnership fund and thus, are also irrelevant. However, all partnership distributions to Fathi Yusuf (*i.e.* income from the Partnership) have been identified and thus, there is no need to further compel any discovery as to this Interrogatory. *See Exhibit 1* – Yusuf's Responses to Interrogatory No. 38.

B. Transfers To and From United Corporation Accounts from September 17, 2012.

As Gaffney has advised Hamed on multiple occasions, all of the financial information relating to the United Corporation (for the Partnership) have been provided to Hamed contemporaneously through the Sage 50 Accounting software. In addition, Hamed has had access to all accounting records of United reflecting any checks or transfers made during the

timeframe in question. Moreover, during this phase, the parties had a dual signature requirement on all checks (one Yusuf and one Hamed) so that Hamed is fully aware of any and all checks written from United. Additionally, as to cancelled checks, Gaffney has explained that the banks do not provide copies of cancelled checks. As all of the financial information relating to United has been provided to Hamed simultaneously, said information has already been produced and there is no need to compel further information. *Id.* Hence, the Motion to Compel should be denied.

II. Request to Produce No. 4 – Fully Responded To, No Need to Compel

Request to Produce No. 4 provides: “For all of the Partnership bank accounts, please provide all bank statements reflecting checks written to Fathi Yusuf, the United Corporation, as well as the cancelled checks from 9/17/2006 to present.” Yusuf shows that he fully responded to same in his original response dated March 1, 2018, which provided:

Yusuf objects to this Request for Production as it is unclear as to checks written to United Corporation. Further responding, Yusuf shows that this request is properly directed to John Gaffney. Yusuf shows that this Request along with other discovery recently submitted should be direct to John Gaffney and maintain that these items were not included in the original list of Gaffney Items 41 through 141 in what appears to be an attempt to circumvent the agreement for John Gaffney to respond to discovery and that payment for his time to be at the expense of the Hamed pursuant to the Join Discovery and Scheduling Plan. According to the request, it appears that John Gaffney has already advised that he does not have all of the cancelled checks from the various bank accounts.

Further responding, Yusuf directs Hamed’s attention to Table 35(b) of the BDO Report which chronicles those checks written to Fathi Yusuf from 2001 to 2012. The supporting documentation for the allocation was also previously provided to Hamed with the original submission of the Yusuf Accounting Claims on September 30, 2016. To the extent that there are additional checks to which Hamed seeks clarification not otherwise listed in Table 35(b), please identify same and this response will be supplemented.

See Yusuf's Objections and Responses dated March 1, 2018 – Exhibit 6 to Hamed's Motion to Compel dated August 8, 2021. Contrary to Hamed's assertions, these tables and the supporting documentation, produced years ago is detailed and organized. To the extent that there are limited distributions after September 17, 2006, that is consistent as to all of the parties. Even the Hamed parties' distributions appear to decline during that timeframe. The reason is the fact that after the FBI raid in October of 2001, Federal Monitors were in place monitoring the financial operations of the Plaza Extra stores and any withdrawal had to be approved by the monitors. Further, the Hamed and Yusuf family employees had increased their salaries, which eliminated much of the need to remove funds from the store on a regular basis, as had been the practice previously when the salaries were extremely low. However, for purposes of this Motion, the responses are more than adequate and there is no need to compel additional responses.

III. Request to Produce 40 – Wedding Gifts

The Request seeks the production of “any and all documents relating to gifts to Mafi Hamed and Shawn Hamed and/or their spouses at the time of their weddings to Yusuf's daughters as to Fathi Yusuf or his spouse or his daughters seeking return, credit or offset in divorce proceedings.” Yusuf objected “on the grounds that ‘the proposed discovery is not relevant to any party's claim or defense.’ V.I. R. Civ. P. 26(b)(2)(C)(iii).”

In his Motion to Compel as to this request for *documents*, Hamed, instead, states he “must have a basic explanation of Yusuf's position on this and all the related documents. It must be a simply and direct statement.” *See* Hamed Motion to Compel as to H-151 – Checks Written to Fathi Yusuf's Personal Use, p. 9. He then argues that this is not a “huge demand – as there are

few documents involved: the withdrawals totaling \$3 million, the gift letters and any checks, emails or correspondence.”

Yusuf shows that his original objections are valid. The documents he has as to the transfers have been provided years ago. In the BDO Report, they were accounted for as against both Hamed and Yusuf, resulting in a “wash” as between the partners. In the BDO Report, the explanation provided is:

During the period covering October 2001 through December 2012, a total of \$3,000,000 was withdrawn through checks issued from the Partnership as gifts to Hisham Hamed and his spouse (\$1,500,000) and to Mufeed Hamed and his spouse (\$1,500,000). We should mention that both spouses are daughters of Mr. Yusuf.

Therefore, for purposes of our analysis it was determined that this amount represented distributions from the Partnership. We adjusted Mr. Hamed's and Mr. Yusuf's distribution by \$1,500,000 for said period.³³

³³ Refer to Exhibit 17 and Table 1.

See Exhibit 17 is attached hereto. Exhibit 17 reflects a number of obvious items:

1. Waleed Hamed signed the checks: Waleed was aware of the checks and executed them. Hence, as the party who wrote the checks, he will be able to attest as to his recollection of the circumstances surrounding their issuance. This further underscores that the Hamed's were fully aware that the funds were to be withdrawn.
2. The Checks Were Endorsed to Mufeed Hamed and Cashed by Mufeed Hamed: Both checks were endorsed to Mufeed Hamed and deposited by Mufeed Hamed. Hence, the Hameds received the funds immediately and they were never deposited into a Yusuf account. Hence, the Hameds issued the checks, signed the checks, the checks were endorsed to a Hamed and deposited by a Hamed.

Yusuf is unaware as to how these funds were treated in the divorce proceedings of one of his daughters. These are all of the documents of which Yusuf is aware relating to these withdrawals. There is no further need to compel any information as Yusuf has properly and adequately responded to same.

For these reasons, Hamed's Motion to Compel should be denied.

Respectfully submitted,

DUDLEY NEWMAN FEUERZEIG, LLP

DATED: February 2, 2022

By: s/Charlotte K. Perrell
CHARLOTTE K. PERRELL (V.I. Bar No. 1281)
Law House 1000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00804-0756
Telephone: (340) 715-4422
Telefax: (340) 715-4400
E-Mail: cperrell@dnfvi.com

Attorneys for Fathi Yusuf and United Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of February, 2022, I caused the foregoing **Yusuf's Opposition to Hamed's Current Motion to Compel Relating to Hamed Claim H-151 – Checks Written for Fathi Yusuf's Personal Use**, which complies with the page and word limitations of Rule 6-1(e), to be served upon the following via the Case Anywhere docketing system:

Joel H. Holt, Esq.
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2132 Company Street
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The Honorable Edgar D. Ross
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and via U.S. Mail to:

The Honorable Edgar D. Ross
Master
P.O. Box 5119
Kingshill, St. Croix
U.S. Virgin Islands 00851

Alice Kuo
5000 Estate Southgate
Christiansted, St. Croix
U.S. Virgin Islands 00820

s/Charlotte K. Perrell

INDEX OF EXHIBITS

Exhibit 1 – Yusuf's Responses to Interrogatory No. 38

Exhibit 17 – Exhibit 17 to preliminary BDO Report

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

WALEED HAMED, as Executor of the)
Estate of MOHAMMAD HAMED,)

Plaintiff/Counterclaim Defendant,)

v.)

FATHI YUSUF and UNITED CORPORATION,)

Defendants/Counterclaimants,)

v.)

WALEED HAMED, WAHEED HAMED,)
MUFEED HAMED, HISHAM HAMED, and)
PLESSEN ENTERPRISES, INC.,)

Additional Counterclaim Defendants.)

WALEED HAMED, as Executor of the)
Estate of MOHAMMAD HAMED,)

Plaintiff,)

v.)

UNITED CORPORATION,)

Defendant.)

WALEED HAMED, as Executor of the)
Estate of MOHAMMAD HAMED,)

Plaintiff,)

v.)

FATHI YUSUF,)

Defendant.)

FATHI YUSUF and)
UNITED CORPORATION,)

Plaintiffs,)

v.)

THE ESTATE OF MOHAMMAD HAMED,)
Waleed Hamed as Executor of the Estate of)
Mohammad Hamed, and)
THE MOHAMMAD A. HAMED LIVING TRUST,)

Defendants.)

CIVIL NO. SX-12-CV-370

ACTION FOR INJUNCTIVE
RELIEF, DECLARATORY
JUDGMENT, AND
PARTNERSHIP DISSOLUTION,
WIND UP, AND ACCOUNTING

Consolidated With

CIVIL NO. SX-14-CV-287

ACTION FOR DAMAGES AND
DECLARATORY JUDGMENT

CIVIL NO. SX-14-CV-278

ACTION FOR DEBT AND
CONVERSION

CIVIL NO. ST-17-CV-384

ACTION TO SET ASIDE
FRAUDULENT TRANSFERS

**DUDLEY, TOPPER
AND FEUERZEIG, LLP**

1000 Frederiksberg Gade

P.O. Box 756

St. Thomas, U.S. V.I. 00804-0756

(340) 774-4422

**RESPONSES TO HAMED'S SIXTH INTERROGATORIES PER THE CLAIM
DISCOVERY PLAN OF 1/29/2018 NOS. 33-41 OF 50**

Defendant/Counterclaimants Fathi Yusuf ("Yusuf") and United Corporation ("United")(collectively, the "Defendants") through their attorneys, Dudley, Topper and Feuerzeig, LLP, hereby provide their Responses to Hamed's Sixth Set of Interrogatories per the Claims Discovery Plan of 1/29/2018, Nos. 33-41 of 50.

GENERAL OBJECTIONS

Defendants make the following general objections to the Interrogatories. These general objections apply to all or many of the Interrogatories, thus, for convenience, they are set forth herein and are not necessarily repeated after each objectionable Request to Admit. The assertion of the same, similar, or additional objections in the individual responses to the Interrogatories, or the failure to assert any additional objections to a discovery request does not waive any of Defendants' objections as set forth below:

(1) Defendants object to these Interrogatories to the extent they may impose obligations different from or in addition to those required under the Virgin Islands Rules of Civil Procedure.

(2) Defendants object to these Interrogatories to the extent that they use the words "any" and "all" as being overly broad, unduly burdensome, immaterial, irrelevant, and not reasonably calculated to lead to the discovery of admissible evidence.

(3) Defendants object to these Interrogatories to the extent they seek information which is protected by the attorney-client privilege or work-product doctrine, including information prepared in anticipation of litigation, or for trial, by or on behalf of Defendants or relating to mental

Interrogatory 38 of 50:

Like Yusuf ROG 14. Identify all assets or amounts in excess of \$10,000 that were transferred to or from Fathi Yusuf or United Corporation from September 17, 2012 to date and what was the value of said assets upon transfer?

Response:

Defendants object to this Interrogatory as vague, ambiguous, and compound such that the total number of interrogatories together with their sub parts and other discovery exceeds the maximum allowable number of interrogatories under the JDSP and violates both the spirit and the terms of the JDSP limiting the number of interrogatory questions.

Defendants further object on the grounds that the responsive information cannot be readily obtained by making reasonable inquiries as these inquiries require the skilled and detailed attention and focus of John Gaffney, former Partnership accountant, to revisit his accounting and work papers. Yusuf is no longer being paid to function as the Liquidating Partner to answer questions on behalf of the Partnership and the accounting that took place during the liquidation process. Likewise, John Gaffney is no longer employed by the Partnership to function in the role as Partnership accountant. To respond to these questions, the expertise and knowledge of John Gaffney is necessary, which diverts him away from his employment with United. Rather, if Hamed seeks information from John Gaffney for questions as to the accounting efforts he undertook as the Partnership accountant, Hamed should be required to compensate John Gaffney for his time in researching and preparing those responses. Furthermore, many of these inquiries as to the Partnership accounting are duplicative of questions Gaffney has previously addressed at or near the time that the transactions took place. Reorienting now as to transactions from years



ago constitutes an undue burden and causes unnecessary time and expense. If Hamed seeks to revisit these issues, Hamed should bear the cost.

Without waiving any objections, all transfers from United Corporation d/b/a Plaza Extra Stores and accounting information reflecting any transactions have been provided to the Hamed's contemporaneously through the Sage 50 Accounting software. In addition, Hamed has had access to all accounting records for United reflecting any checks or transfers made during the timeframe in question. Hence, the information has been provided to Hamed and the burden of reproducing same would be equal for Hamed to gather.

DUDLEY, TOPPER AND FEUERZEIG, LLP

DATED: May 15th, 2018

By:



CHARLOTTE K. PERRELL

(V.I. Bar #1281)

Law House

1000 Frederiksberg Gade - P.O. Box 756

St. Thomas, VI 00804-0756

Telephone: (340) 715-4422

Facsimile: (340) 715-4400

E-Mail: cperrell@dtflaw.com

*Attorneys for Fathi Yusuf and United
Corporation*

CERTIFICATE OF SERVICE

It is hereby certified that on this 15th day of May, 2018, I caused the foregoing a true and exact copy of the foregoing **RESPONSE TO HAMED'S SIXTH INTERROGATORIES PER THE CLAIMS DISCOVERY PLAN OF 1/29/2018, NOS. 33-41** to be served upon the following via Case Anywhere docketing system:

Joel H. Holt, Esq.
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**DUDLEY, TOPPER
AND FEUERZEIG, LLP**

1000 Frederiksberg Gade
P.O. Box 756

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(340) 774-4422

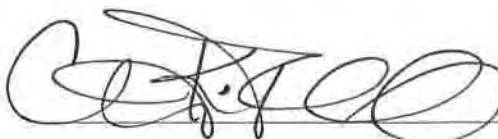


Exhibit 17 - to
BDO Report

Fathi Yusuf
PO Box 503358
St. Thomas, USVI 00805

July 1, 2011

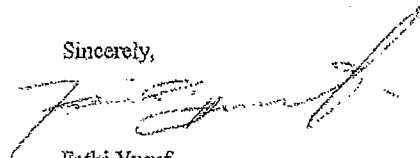
Mufeed Hamed
PO Box 763
Christiansted, USVI 00821

Dear Mufeed:

This correspondence will acknowledge and memorialize my conveyance today of a gift in the amount of \$750,000 to you.

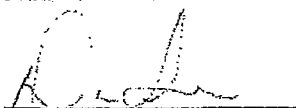
I am giving you the unrestricted right to the immediate use of this money for whatever purpose you desire. I expect no repayment of this gift from me, whether in the form of cash, property, or future services.

Sincerely,

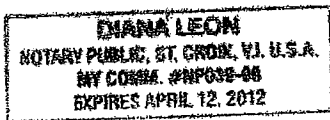


Fathi Yusuf

Sworn to before me this
1 day of July, 2011



Notary Public



HAMD607613

Confidential
Protective Order

Plaza Extra Supermarket
 340-719-1870
 14 Estate Plessen
 Fsted, St Croix, USVI 00840

1104
101-806/216

PAY TO THE ORDER OF Fawzia Yusuf \$ 750,000.00

Seven Hundred Fifty Thousand Dollars 00/100 DOLLARS

Scotiabank
THE BANK OF NOVA SCOTIA
ST. CROIX, U.S. VIRGIN ISLANDS

FOR Distribution

DATE _____

[Signature] ← Signed by Waleed Hamed

⑆001104⑆ ⑆021606069⑆ 058⑆60092918⑆

UNITED CORPORATION D/B/A
 PLAZA EXTRA
 340-778-6240
 PO BOX 763
 CHRISTIANSTED, USVI 00821-0763

1149
101-806/216

To The Order of Fathi Yusuf \$ 750,000.00

Seven Hundred Fifty Thousand Dollars 00/100 DOLLARS

Scotiabank
THE BANK OF NOVA SCOTIA
ST. CROIX, U.S. VIRGIN ISLANDS

FOR Distribution

DATE _____

[Signature] ← Signed by Waleed

⑆001149⑆ ⑆021606069⑆ 058⑆60086413⑆

HAMD607614

Confidential
Protective Order

Mufeed Hamed
Pay to: Mufeed Hamed
Mufeed Hamed

Endorsed to
Mufeed Hamed
- "Pay to: Mufeed
Hamed"

Mufeed Hamed
Pay to: Mufeed Hamed
Mufeed Hamed

Endorsed to
Mufeed Hamed
- "Pay to: Mufeed
Hamed"

HAMD607615

Confidential
Protective Order

Fathi Yusuf
PO Box 503358
St. Thomas, USVI 00805

July 1, 2011

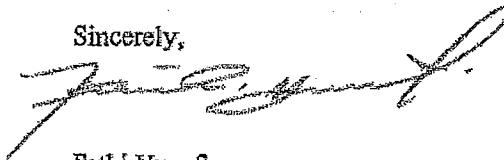
Hisham Hamed
PO Box 763
Christiansted, USVI 00821

Dear Hisham:

This correspondence will acknowledge and memorialize my conveyance today of a gift in the amount of \$750,000 to you.

I am giving you the unrestricted right to the immediate use of this money for whatever purpose you desire. I expect no repayment of this gift from me, whether in the form of cash, property, or future services.

Sincerely,

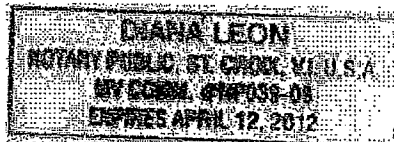
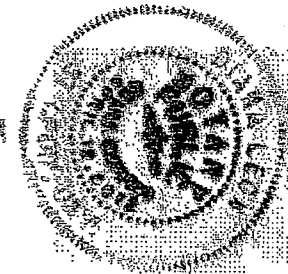


Fathi Yusuf

Sworn to before me this
1 day of July, 2011



Notary Public



HAMD594276



HISHAM M. HAMED
PO BOX 3649
KINGSHILL VI 00851-3649

191-1851
POPULAR PL

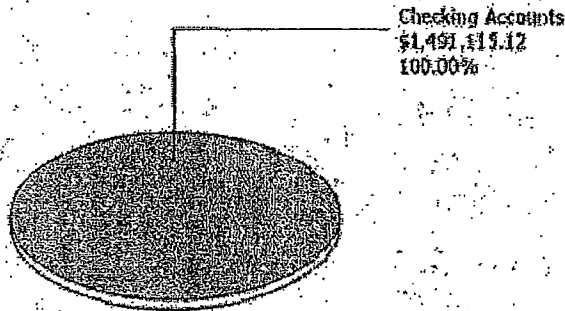
450

This statement reflect your transactions after July 29, 2011 to August 31, 2011

Page 1

Bank Relationship Summary

DEPOSITS	Checking Accounts	+	Savings/Money Market	+	Certificates/IRA/CAE	= Total
	1,491,115.12		0.00		0.00	1,491,115.12
CREDIT	Reserve	+	Credit Cards	+	Loans	= Total
	0.00		0.00		0.00	0.00



Popular Plus Account Detail

CHECKING

BALANCE INFORMATION

Beginning Balance	+ Deposits/Credits	- Checks/Debits	= Ending Balance
40,776.00	1,573,693.76	123,354.64	1,491,115.12
Average Daily Balance*	Days in Statement Cycle	Periodic Rate	Annual Percentage Yield Earned
402,403.30	33	0.000685%	0.25%

REGULAR AND ELECTRONIC CREDITS

Date	Description	Amount
08-02	Deposit Reference: 13001748293 United Corporal Payroll	4,229.84
08-09	Deposit Reference: 21003493372 United Corporal Payroll	4,229.84
08-17	Deposit Reference: 485049400	50,000.00

Date	Description	Amount
08-17	Deposit Reference: 485152947	2,453.61
08-17	Deposit Reference: 28005296347 United Corporal Payroll	4,229.84
08-24	Deposit number 40 Reference: 500065056	750,000.00

HISHAM M HAMED

191-1855
POPULAR PLU

This statement reflect your transactions after July 29, 2011 to August 31, 2011.

Page 2

REGULAR AND ELECTRONIC CREDITS

Date	Description	Amount
08-24	Deposit number 40 Reference: 500065058	750,000.00
08-24	Deposit XXXXXX5947 Reference: 34006516915 United Corporat Payroll	4,229.84

Date	Description	Amount
08-31	Deposit XXXXXX5947 Reference: 42008474787 United Corporat Payroll	4,229.84
08-31	Interests credited	90.95

CHECKS

Number	Amount	Date	Reference
341	4,000.00	08-09	0485143901
344	5,000.00	08-03	0485055946
346	920.00	08-01	0485160982
347	800.25	08-01	0485160983
348	3,000.00	08-15	0485190291
349	5,000.00	08-15	0485200190
350	5,000.00	08-24	0500086875

Number	Amount	Date	Reference
351	4,000.00	08-24	0500086632
352	3,000.00	08-29	0500183133
353	4,000.00	08-26	0500144232
354	2,420.00	08-24	0500086882
356	3,560.00	08-29	0500183135
358	50,200.00	08-30	0500060742

OTHER REGULAR AND ELECTRONIC DEBITS

Date	Description	Amount
08-01	Payment XXXXXX1234 Reference: 13001183632 Citi Card Online Payment	5,562.58
08-10	Payment XXXXXX4222 Reference: 22003678856 Bank Of America Mortgage	2,000.00
08-10	Payment XXXXXX8899 Reference: 22003678855 Bank Of America Mortgage	1,500.00
08-10	Payment XXXXXX5814 Reference: 22003678858 Bank Of America Mortgage	1,500.00
08-10	Payment XXXXXX2400 Reference: 22003664437 Harland Checks Chk Orders	39.61

Date	Description	Amount
08-15	Pay by phone XXXXXX6560 Reference: 12226995011 Mortgage US Virgin Island	5,085.50
08-22	Payment XXXXXX5843 Reference: 34006519074 Citi Card Online Payment	4,337.97
08-23	Payment XXXXXX3676 Reference: 35006562342 Citi Card Online Payment	9,772.82
08-26	Payment XXXXXX1933 Reference: 38007567680 Citi Card Online Payment	2,656.51

MINIMUM BALANCE

Date	Description	Amount
08-15	Minimum balance during this cycle	14,827.74

*You paid 0 service charges for maintaining the established combined average balance between your account, CDs and IRAs.

IMPORTANT NOTICE

For more information about your statement or our services call 787-724-3650 or call 1-888-724-3650.

