

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

**HAMED'S SECOND NOTICE RE CLAIM B(2) EXPERT WITNESSES AND REPORTS
(AS TO DEFENDED CLAIMS) -- PER THE ORDERS OF THE SPECIAL MASTER
DATED JUNE 14, 2021 AND NOVEMBER 16, 2021**

On June 14, 2021, the Special Master issued the *Second Amended Joint Discovery and Scheduling Plan*. At page 5 it required the following with regard to the six (6) remaining "B(2)" claims (non-Gaffney claims):

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.

Thereafter, on November 16, 2021, the Special Master issued the *Third Amended Joint Discovery and Scheduling Plan*. It provided a 60-day extension of the dates for filing of that expert information as follows:

ORDERED that a 60-day enlargement of the deadlines set forth in the second amended scheduling order is GRANTED.

Hamed filed the requisite notice on April 8, 2022. In addition, the Special Master ordered:

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 [Now May 15, 2022 due to the 2nd Order.]

.As ordered, Hamed provides this timely notice for the three remaining Yusuf claims.

On September 30, 2016, Hamed filed his *Notice of Partnership Claims and Objections to Yusuf's Post-January 1, 2012 Accounting*. It was re-filed to redact certain information, with the Master's permission on October 17, 2016. Attached as Exhibit B-2 to that filing was the expert opinion of Hamed's expert CPA firm. Included therein are the curriculum vitae of Beatriz Martin, the project lead, as well of the other project members. (Note: the firm has altered and changed names since, but CPA Martin remains with the successor firm.) Hamed gives notice that the Expert Report as originally filed will be used

with regard to this issue. An additional copy is not attached as per the Court's directions on duplication of exhibits.

However, Hamed notes that Yusuf is under the Special Master's recent orders to provide critical information with regard to these two claims—but has not yet done so. Nor has Yusuf filed the Expert Disclosures for these two claims. Thus, Hamed may need to supplement this notice when those events occur.

Dated: May 15, 2022



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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of May 2022, 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

Charlotte Perrell

Stefan Herpel

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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).

A handwritten signature in blue ink, appearing to read "Carl J. Hamed", with a long horizontal flourish extending to the right.

Dated: May 15, 2022