

**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.)	
)	ACTION FOR INJUNCTIVE
FATHI YUSUF and UNITED CORPORATION,)	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,)	
)	CIVIL NO. SX-14-CV-287
Plaintiff,)	
v.)	ACTION FOR DAMAGES AND
)	DECLARATORY JUDGMENT
UNITED CORPORATION,)	
)	
<u>Defendant.</u>)	
WALEED HAMED, as Executor of the Estate of MOHAMMAD HAMED,)	CIVIL NO. SX-14-CV-278
)	
Plaintiff,)	ACTION FOR DEBT AND
v.)	CONVERSION
)	
FATHI YUSUF,)	
<u>Defendant.</u>)	
FATHI YUSUF and UNITED CORPORATION,)	
)	CIVIL NO. ST-17-CV-384
Plaintiffs,)	
v.)	ACTION TO SET ASIDE
)	FRAUDULENT TRANSFERS
)	
THE ESTATE OF MOHAMMAD HAMED, Waleed Hamed as Executor of the Estate of Mohammad Hamed, and THE MOHAMMAD A. HAMED LIVING TRUST,)	
)	
Defendants.)	
<u></u>)	

**OPPOSITION TO HAMED’S REVISED MOTION FOR AN ORDER TO SHOW CAUSE AS
TO CONTEMPT WITH REGARD TO THE SPECIAL MASTER’S ORDER OF MAY 11, 2022
(REGARDING CLAIM H-151: CHECKS TO YUSUF)**

COMES NOW, Fathi Yusuf (“Yusuf”) and hereby files this his Opposition to Hamed’s Revised Motion for an Order to Show Cause as to Contempt with Regard to the Special Master’s Order of May 11, 2022 (Regarding Claim H-151: Checks to Yusuf) and shows as follows:

I. As to Interrogatory No. 38:

Interrogatory No. 38, as revised by the Court’s Order of May 11, 2022 sought Yusuf to:

“Identify all amounts in excess of \$10,000 that were transferred from the Partnership account(s) to Fathi Yusuf or United Corporation via checks from September 17, 2012 thru March 9, 2015.”

In Yusuf’s Supplemental Response, served on June 10, 2022, he explained that he had requested John Gaffney to review the accounting records of the Plaza Extra stores to secure the information requested. *See – Exhibit 1 – Supplemental Responses.* The original general ledgers for this period of time reflect the information responsive to this interrogatory and were provided. The information identified all of the instances in which Yusuf received funds from partnership accounts and the specific listings were then condensed and put into the Supplemental Response. Yusuf further noted that all of the General Ledgers were provided and had been previously provided to the Hamed’s contemporaneously by John Gaffney over the course of this litigation, and thus, Hamed had this information already. Nonetheless, they were reproduced in the Supplemental Responses to insure that Hamed had a full and complete set. Yusuf has now provided his verification to Interrogatory No. 38.

To ensure that all of the information was provided, Yusuf included all of the General Ledgers for the requested period of time. It was not a “data dump” as Hamed attempts to portray. Rather, it was an all inclusive listing tracking all of the funds for the three stores, that can then be sorted or filtered to reflect anything with Fathi Yusuf’s name or United Corporation. To congeal the documentation, screen shots

of the various transactions reflecting Fathi Yusuf's name or United Corporation were put together in the Supplemental Response to Interrogatory No. 38. Hence, the Supplemental Response and the comprehensive General Ledger provided in Excel format so that Hamed could sort and further review if he so desired, is fully responsive to identify all amounts (not just those over \$10,000) transferred from Partnership accounts to Fathi Yusuf or United Corporation during the requested period.

Hamed complains that a single bank document was not included in response to Interrogatory No. 38.¹ However, this argument appears to combine or conflate the exception Hamed takes with Yusuf's Response to Request to Produce No. 4, seeking documents, rather than his concerns with an interrogatory response. As to an interrogatory response, Yusuf's Supplemental Response is sufficient. There is no basis to find any contempt as the information was fully provided.

II. As to Request to Produce 4:

Following the Court's Order of May 11, 2022, the request to produce was revised to read:

"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 January 2012 to the present."

The Court also ordered:

"For the specific Bank accounts referenced in Hamed's motion, Yusuf will not be required to produce bank statements and cancelled checks that Hamed already has in his possession."

First, while Yusuf recognizes that Hamed is seeking bank records, Yusuf also shows that this is not a situation in which Hamed has not had access to the substantive information, *i.e.* funds in and out of the Partnership accounts during this timeframe. Quite the contrary, the Hameds have had access to this information in real time. Hamed has had all of the information in the form of the General Ledgers, contemporaneously with their creation.

¹ Hamed argues "**the data dump did not 'identify' anything from any bank – not a single statement or check was provided.**" See Hamed's Motion to Show Cause, p. 7.

Second, as Yusuf indicated in his Supplemental Response, as to the Plaza East and Plaza West stores, Banco Popular stopped providing copies of enclosures with the bank statement as that relationship was strained with the dual signatory requirements of Hameds and Yusufs during this litigation. The fact that dual signatures were required (*i.e.* one from the Hamed family and one from the Yusuf family), also indicates that the Hamed's were fully aware of any and all checks written. Third, as to the St. Thomas store, with regard to the corresponding bank statements to the General Ledger information, as previously explained by John Gaffney, the accounts were held with Scotia and there existed a strained relationship in the 2012 to 2014 period when the accounts were ultimately closed. Scotia did not provide bank statements requiring the accounting department to perform reconciliations from online screen prints. Those online screen prints were maintained in the sales journal records at the St. Thomas location.

Fourth, Hamed has admitted to having a significant amount of this information, *i.e.* years of banks statements for the partnership accounts. As Yusuf is only required to provide information *which Hamed does not already have in his possession*, the scope of this information is limited. See **Exhibit 2** – Chart Reflecting the Hamed Gaps and Documents Produced. As an example, in the Plaza East Store, Hamed has admitted that he already has all of the bank statements for every single month for all of 2013, 2014 and January thru March of 2015. Hence, the only remaining documents allegedly outstanding is for the four (4) months, September, October, November and December of 2012. *Id.* Likewise, as to the Plaza West Store, Hamed has admitted that he already has all of the bank statements for every single month for all of 2013, 2014, and January thru March of 2015. Hence, again, the only remaining documents allegedly outstanding is for the four (4) months, September, October, November and December of 2012. *Id.* Therefore, Hamed's arguments only relate to a limited amount of information, primarily focused in the final months of 2012, (prior to Gaffney's involvement and organization of

records). Hamed has both: a) years of bank statements and b) all of the General Ledgers (contemporaneously provided to him and again reproduced to him with the Supplemental Response).

As John Gaffney has returned to the Territory, Yusuf has coordinated with him to determine if any bank records or cancelled checks exist responsive to this request. Gaffney has secured the information as indicated in the attached chart. *See* Exhibit 2. That information has been bates-stamped and produced herewith.

As to Plaza Extra -Tutu, as previously explained by John Gaffney, the accounts were held with Scotia and there existed a strained relationship in the 2012 to 2014 period when the accounts were ultimately closed. Scotia did not provide bank statements requiring the accounting department to perform reconciliations from online screen prints. Those online screen prints were maintained in the sales journal records at the St. Thomas location. Following Gaffney's return to the Territory, he has been able to secure certain documents responsive to this request. That information has been bates-stamped and produced herewith as indicated in the attached chart.

Based upon Gaffney's review of the records, Yusuf maintains that he has conducted a diligent and reasonable search for documents in his possession, custody and control which is responsive to the request. Yusuf is not aware of any additional documents at this time.

It is not Yusuf's intention to cause unnecessary trouble or delay to this process. He is dependent upon John Gaffney to assist in the review of this information. Gaffney has explained the challenges with the documentation to Hamed repeatedly and has taken significant efforts to provide documentation and the information requested.

CONCLUSION

For the foregoing reasons, Yusuf shows that he has sufficiently shown good cause for why he should not be held in contempt and that Hamed's Motion for an Order to Show Cause should be denied.

DUDLEY NEWMAN FEUERZEIG, LLP

DATED: March 30, 2023

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

CERTIFICATE OF SERVICE

It is hereby certified that on this 30th day of March, 2023, I caused the foregoing a true and exact copy of the foregoing **OPPOSITION TO HAMED REVISED MOTION FOR ORDER TO SHOW CAUSE** to be served upon the following via Case Anywhere docketing system:

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s/Charlotte K. Perrell

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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

**SUPPLEMENTAL RESPONSES
TO HAMED'S DISCOVERY**

Defendant/Counterclaimants Fathi Yusuf ("Yusuf") and United Corporation ("United")(collectively, the "Defendants") through their attorneys, Dudley Newman Feuerzeig, LLP hereby provide their Supplemental Responses to Hamed's discovery as follows:

1. Interrogatory 38:

Following the Court's Order of May 11, 2022, the interrogatory was revised to read:

"Identify all amounts in excess of \$10,000 that were transferred from the Partnership account(s) to Fathi Yusuf or United Corporation via checks from September 17, 2012 thru March 9, 2015."

Supplemental Response:

Yusuf requested John Gaffney to review the accounting records of the Plaza Extra stores to secure the information requested. The original general ledgers for this period of time reflects the information responsive to this interrogatory and it is as follows:

4038	106000-10	Banco Popular Operating STX	2/6/12		GENJ	Wic Dep	2,226.76	
4039	106000-10	Banco Popular Operating STX	2/7/12	64866	CDJ	UNITED SHOPPING PLAZA		5,408,806.74
4040	106000-10	Banco Popular Operating STX	2/7/12	64864	CDJ	UNITED CORPORATION DBA UNITED		5,408,806.74
4041	106000-10	Banco Popular Operating STX	2/7/12	64865	CDJ	UNITED SHOPPING PLAZA		5,408,806.74
4042	106000-10	Banco Popular Operating STX	2/7/12	64864V	CDJ	UNITED CORPORATION DBA UNITED	5,408,806.74	
4043	106000-10	Banco Popular Operating STX	2/7/12	64865V	CDJ	UNITED SHOPPING PLAZA	5,408,806.74	
31574	105000-10	Scotia - Telecheck East	8/15/12		GENJ	CHK MAKE TO UNITED CORPORATION		2,784,706.25
31575	305100-10	Sales - Checks	8/15/12		GENJ	CHK MAKE TO UNITED CORPORATIC	2,784,706.25	
146197	105200-20	Scotia - Payroll STT	12/29/12	65178	PRJ	YUSUF, FATHI		32,550.87
146198	105200-20	Scotia - Payroll STT	12/30/12	65380	PRJ	YUSUF, FATHI		9,122.93
146252	231000-20	Accrued VI Withholding T	12/29/12	65178	PRJ	YUSUF, FATHI		16,724.13
146463	670020-20	Officers' Salaries	12/29/12	65178	PRJ	YUSUF, FATHI		50,000.00
146464	670020-20	Officers' Salaries	12/30/12	65380	PRJ	YUSUF, FATHI		13,134.62
17350	33000	Dividend Distributions	1/15/13	18040	CDJ	BUREAU OF INTERNAL REVENUE - 2012-Q4 FATHI YUSUF EST TAX PAYMENT		360,000.00
8	10500	Cash - Bank Telchk 2918	4/10/13	1118	GENJ	1ST QTR 2013 ESST. TAX FATHI YUSUF		324,000.00
9	33000	Dividend Distributions	4/10/13	1118	GENJ	1ST QTR 2013 ESST. TAX FATI	324,000.00	
46887	14100	Due from (to) Plaza East	12/31/14	XJE31-11	GENJ	F YUSUF DIV DISTRIB'S BY EAST AND POST AGAINST WEST PSHIP		4,375,835.50
46888	10500	Cash - Bank Telchk 2918	10/7/14	1128	CDJ	FATHI YUSUF		1,000,000.00
46889	33000	Dividend Distributions	10/7/14	1128	CDJ	FATHI YUSUF - PLAZA DISTRIBI	1,000,000.00	

Q	AMOUNT	REVENUE - SALES	11/20/14	5520	GENJ (UNOZAN VINE CR)		19,941.10
55582	69000	Wages - Officer Salaries	11/26/14	DD114361	PRJ FATHI M. YUSUF		5,500.00
55583	69000	Wages - Officer Salaries	12/3/14	DD114512	PRJ FATHI M. YUSUF		5,500.00
55584	69000	Wages - Officer Salaries	12/10/14	DD114663	PRJ FATHI M. YUSUF		5,500.00
55585	69000	Wages - Officer Salaries	12/17/14	DD114812	PRJ FATHI M. YUSUF		5,500.00
55586	69000	Wages - Officer Salaries	12/24/14	DD114960	PRJ FATHI M. YUSUF		5,500.00
55587	69000	Wages - Officer Salaries	12/30/14	DD115109	PRJ FATHI M. YUSUF		5,500.00
55588	10500	Cash - Bank Telchk 6413	4/14/14	1167	CDJ FATHI YUSUF		1,375,835.50
55589	10500	Cash - Bank Telchk 6413	8/11/14	1178	CDJ FATHI YUSUF		1,000,000.00
55590	10500	Cash - Bank Telchk 6413	10/1/14	1180	CDJ FATHI YUSUF		1,000,000.00
55591	10500	Cash - Bank Telchk 6413	11/26/14	1184	CDJ FATHI YUSUF		1,000,000.00
55592	33000	Dividend Distributions	4/14/14	1167	CDJ FATHI YUSUF - DISTRIBUTION	1,375,835.50	
55593	33000	Dividend Distributions	10/1/14	1180	CDJ FATHI YUSUF - Dividend Distribu	1,000,000.00	
55594	33000	Dividend Distributions	11/26/14	1184	CDJ FATHI YUSUF - Dividend Distribu	1,000,000.00	
55595	33000	Dividend Distributions	8/11/14	1178	CDJ FATHI YUSUF - PLAZA DISTRIB	1,000,000.00	
55596	10300	Cash - Bank Op'a 8830	10/28/14	63587	CDJ FATIMA P. BROWN		150.00
34523	69200	Wages - Managers	04/29/15	2015-0429-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		27,500.00
34524	67200	Taxes - Empr FICA & Mec	06/24/15	2015-0624-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		186.00
34525	67200	Taxes - Empr FICA & Mec	06/24/15	2015-0624-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		319.00
34526	69200	Wages - Managers	06/24/15	2015-0624-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		22,000.00
34527	67200	Taxes - Empr FICA & Mec	03/25/15	2015-0325-01	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		682.00
34528	67200	Taxes - Empr FICA & Mec	03/25/15	2015-0325-01	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		159.50
34529	69200	Wages - Managers	03/25/15	2015-0325-01	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		11,000.00
34530	67200	Taxes - Empr FICA & Mec	05/27/15	2015-0527-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		1,364.00
34531	67200	Taxes - Empr FICA & Mec	05/27/15	2015-0527-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		319.00
34532	69200	Wages - Managers	05/27/15	2015-0527-03	PJ UNITED CORPORARION - FATHI YUSUF PAYRO		22,000.00
10751	10600	Cash - Bank Claims 9091	03/06/15	100	CDJ FATHI YUSUF		5,000,000.00
10752	33000	Dividend Distributions	03/06/15	100	CDJ FATHI YUSUF - PSHIP DISTRIB FR CLAIMS RESERVE	5,000,000.00	
10753	10600	Cash - Bank Claims 9091	05/01/15	109	GENJ FATHI YUSUF 50% INT FOR STT		4,270,000.00
10754	33000	Dividend Distributions	05/01/15	109	GENJ FATHI YUSUF 50% INT FOR STT	4,270,000.00	
10755	10600	Cash - Bank Claims 9091	05/01/15	110	GENJ FATHI YUSUF 50% INTEREST MATCHING FUND		4,270,000.00
10756	33000	Dividend Distributions	05/01/15	110	GENJ FATHI YUSUF 50% INTEREST MATCHING FUND	4,270,000.00	
10757	10600	Cash - Bank Claims 9091	04/09/15	105	GENJ FATHI YUSUF DISTRIB RE 2014 INC TAX ESTIMATE		992,613.00
10758	33000	Dividend Distributions	04/09/15	105	GENJ FATHI YUSUF DISTRIB RE 2014 INC TAX ESTIMATE	992,613.00	

Yusuf further notes that all of the General Ledgers were provided to the Hamed's contemporaneously by John Gaffney over the course of this litigation. They are reproduced herein simply to insure that all are complete.

2. Request to Produce 4:

Following the Court's Order of May 11, 2022, the request to produce was revised to read:

"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 January 2012 to the present."

Supplemental Response:

Yusuf provides the attached Excel spreadsheets reflecting the General Ledger for United partnership accounts as well as a sorted version reflecting any amounts payable to Fathi Yusuf or the United Corporation for the periods indicated.

As to the corresponding bank statements, as previously explained by John Gaffney, as to the St. Thomas store, the accounts were held with Scotia and there existed a strained relationship in the 2012 to 2014 period when the accounts were ultimately closed. Scotia did not provide bank

statements requiring the accounting department to perform reconciliations from online screen prints. Those online screen prints were maintained in the sales journal records at the St. Thomas location. Yusuf is continuing to search for any records from that time or determine if they still remain at the St. Thomas store. In which case, those records would be in the care, custody and control of the Hameds.

As to the Plaza East and Plaza West stores, Banco Popular stopped providing copies of enclosures with the bank statement as that relationship was also strained with the dual signatory requirements of Hameds and Yusufs during this litigation. We solicited the assistance of John Gaffney but were unable to receive a response prior to his departure for a pre-planned period off-island. We are continuing our efforts to secure any copies of bank statements not previously provide that are in our possession, custody or control.

DUDLEY NEWMAN FEUERZEIG, LLP

DATED: June 10, 2022

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

CERTIFICATE OF SERVICE

It is hereby certified that on this 10th day of June, 2022, I caused the foregoing a true and exact copy of the foregoing **SUPPLEMENTAL RESPONSES TO HAMED'S DISCOVERY** to be served upon the following via Case Anywhere docketing system:

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s/Charlotte K. Perrell

VERIFICATION

I hereby certify under penalty of perjury that the facts contained in each of the foregoing response to Interrogatory #38 is true and correct to the best of my knowledge, information and belief.

Dated: March, 30, 2023.

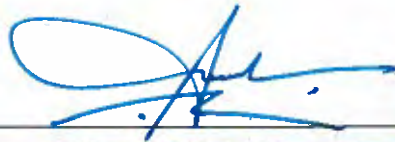
 Attesting Individual

TERRITORY OF THE UNITED STATES VIRGIN ISLANDS

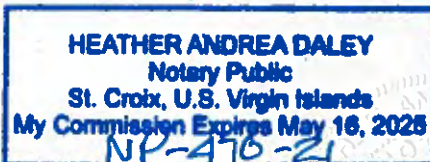
DISTRICT OF ST. CROIX, U.S. VIRGIN ISLANDS ss.

On this, the 30th day of MARCH, 2023, before me, the undersigned officer, personally appeared the signor known to me (or satisfactorily proven to be) the person whose name is subscribed to the within document and acknowledged that he/she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



Notary Public



SPREADSHEET H-151
Bank Documentation Available

Exhibit 2

<u>BANK ACCOUNT</u>	<u>ORDERED</u> (Per Order entered May 11, 2022)	<u>HAMED HAS IN HIS POSSESSION</u> (Per Hamed's August 8, 2021 Motion to Compel, p. 8)	<u>YUSUF PRODUCED PREVIOUSLY</u>	<u>ADDITIONAL INFO UPON GAFFNEY RETURN 3-2023</u> (Beyond what Hamed already has)
Banco Popular 191-148830 United Operating Account Plaza East	Sept. 17, 2012 thru March 9, 2015, unless Hamed already has in his possession			
	Sep-12	Doesn't have	2012 Plaza East General Ledger Detail - FY014845	
	Oct-12	Doesn't have	2012 Plaza East General Ledger Detail - FY014845	
	Nov-12	Doesn't have	2012 Plaza East General Ledger Detail - FY014845	
	Dec-12	Doesn't have	2012 Plaza East General Ledger Detail - FY014845	Dec-12 Statement and Checks
	Jan-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Feb-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Mar-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Apr-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	May-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Jun-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Jul-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Aug-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Sep-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Oct-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Nov-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Dec-13	Statement	2013 Plaza East General Ledger Detail - FY014860	
	Jan-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Feb-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Mar-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Apr-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	May-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Jun-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Jul-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Aug-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Sep-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Oct-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Nov-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Dec-14	Statement	2014 Plaza East General Ledger Detail - FY14870	
	Jan-15	Statement	2015 Plaza General Ledger - FY-014873	
	Feb-15	Statement	2015 Plaza General Ledger - FY-014873	
	Mar-15	Statement	2015 Plaza General Ledger - FY-014873	

<u>BANK ACCOUNT</u>	<u>ORDERED</u> (Per Order entered May 11, 2022)	<u>HAMED HAS IN HIS POSSESSION</u> (Per Hamed's August 8, 2021 Motion to Compel, p. 8)	<u>YUSUF PRODUCED PREVIOUSLY</u>	<u>ADDITIONAL INFO UPON GAFFNEY RETURN 3-2023</u> (Beyond what Hamed already has)
Banco Popular 191-256269 United Operating Account Plaza West	Sept. 17, 2012 thru March 9, 2015, unless Hamed already has in his possession			
	Sep-12	Doesn't have	2012 Plaza West General Ledger Detail - FY014857	Sep-12 Statements and Checks
	Oct-12	Doesn't have	2012 Plaza West General Ledger Detail - FY014857	Oct-12 Statements and Checks
	Nov-12	Doesn't have	2012 Plaza West General Ledger Detail - FY014857	Nov-12 Statements and Checks
	Dec-12	Doesn't have	2012 Plaza West General Ledger Detail - FY014857	Dec-12 Statements and Checks
	Jan-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Feb-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Mar-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Apr-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	May-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Jun-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Jul-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Aug-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Sep-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Oct-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Nov-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Dec-13	Statement	2013 Plaza West General Ledger Detail - FY014861	
	Jan-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Feb-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Mar-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Apr-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	May-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Jun-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Jul-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Aug-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Sep-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Oct-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Nov-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Dec-14	Statement	2014 Plaza West General Ledger Detail - FY014868	
	Jan-15	Statement	2015 Plaza General Ledger - FY014873	
	Feb-15	Statement	2015 Plaza General Ledger - FY014873	
	Mar-15	Statement	2015 Plaza General Ledger - FY014873	

<u>BANK ACCOUNT</u>	<u>ORDERED</u> (Per Order entered May 11, 2022)	<u>HAMED HAS IN HIS POSSESSION</u> (Per Hamed's August 8, 2021 Motion to Compel, p. 8)	<u>YUSUF PRODUCED PREVIOUSLY</u>	<u>ADDITIONAL INFO UPON GAFFNEY RETURN 3-2023</u> (Beyond what Hamed already has)
Scotia Bank 044-55312010 United Operating Account STT	Sept. 17, 2012 thru March 9, 2015, unless Hamed already has in his possession			
				Scotia did not produce Bank statements from 2012-2014, unless individually requested, otherwise reconciled with screen shots.
	Sep-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Oct-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Nov-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Dec-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
		Doesn't have		
	Jan-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Feb-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Mar-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Apr-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	Apr - 13 - Statements and Checks
	May-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jun-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jul-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Aug-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Sep-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Oct-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Nov-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Dec-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jan-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Feb-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Feb-14 Account Reconciliation with Online Screen Shots and
	Mar-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Apr-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Apr-14 Account Reconciliation with Online Screen Shots and
	May-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Jun-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Jul-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Aug-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Sep-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Oct-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Nov-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Dec-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	Account Reconciliation with Online Screen Shots
	Jan-15	Statement	2015 Plaza General Ledger - FY014873	Jan-15 - Statements and Checks
	Feb-15	Statement	2015 Plaza General Ledger - FY014873	
	Mar-15	Statement	2015 Plaza General Ledger - FY014873	Mar-15 Account Reconciliations with Online Screen Shots and

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Banco Popular XXX-XX9091 Partnership Claims Account	Sept. 17, 2012 thru March 9, 2015, unless Hamed already has in his possession			
	Sep-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Oct-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Nov-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Dec-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Jan-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Feb-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Mar-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Apr-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	May-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jun-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jul-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Aug-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Sep-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Oct-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Nov-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Dec-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jan-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Feb-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Mar-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Apr-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	May-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Jun-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Jul-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Aug-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Sep-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Oct-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Nov-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Dec-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Jan-15	Statements and Checks	2015 Plaza General Ledger - FY014873	
	Feb-15	Statements and Checks	2015 Plaza General Ledger - FY014873	Feb-15 - Statements and Checks
	Mar-15	Statements and Checks	2015 Plaza General Ledger - FY014873	Mar-15 - Statements and Checks

<u>BANK ACCOUNT</u>	<u>ORDERED</u> (Per Order entered May 11, 2022)	<u>HAMED HAS IN HIS POSSESSION</u> (Per Hamed's August 8, 2021 Motion to Compel, p. 8)	<u>YUSUF PRODUCED PREVIOUSLY</u>	<u>ADDITIONAL INFO UPON GAFFNEY RETURN 3-2023</u> (Beyond what Hamed already has)
Banco Popular XXX-XX9075 Partnership Liquid Expense Account	Sept. 17, 2012 thru March 9, 2015, unless Hamed already has in his possession			
	Sep-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Oct-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Nov-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Dec-12	Doesn't have	2012 Plaza STT General Ledger Detail - FY014838	
	Jan-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Feb-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Mar-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Apr-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	May-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jun-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jul-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Aug-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Sep-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Oct-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Nov-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Dec-13	Doesn't have	2013 Plaza STT General Ledger Detail - FY014859	
	Jan-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Feb-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Mar-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Apr-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	May-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Jun-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Jul-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Aug-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Sep-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Oct-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Nov-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Dec-14	Doesn't have	2014 Plaza STT General Ledger Detail - FY014869	
	Jan-15	Doesn't have	2015 Plaza General Ledger - FY014873	
	Feb-15	Doesn't have	2015 Plaza General Ledger - FY014873	Feb-15 - Statements and Checks
	Mar-15	Doesn't have	2015 Plaza General Ledger - FY014873	Mar-15 - Statements and Checks