

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

UNITED CORPORATION,  
Plaintiff,

v.

WADDA CHARRIEZ,

Defendant.

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WADDA CHARRIEZ,  
Counter-Claimant,

v.

UNITED CORPORATION,  
Defendant.

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WADDA CHARRIEZ,

Third-Party Plaintiff,

v.

FATHI YUSUF,

Third-Party Defendant.

Case No.: 2013-CV-152

**ACTION FOR DAMAGES  
& RECOUPMENT**

**JURY TRIAL DEMANDED**

**DEFENDANT WADDA CHARRIEZ'S FIRST  
INTERROGATORIES TO PLAINTIFF UNITED CORPORATION**

Defendant Charriez, by counsel, propounds the following interrogatories pursuant to V.I. R. Civ. P. 33 on Plaintiff United Corporation. **Defendant Charriez will propound additional discovery when United Corporation files an answer to Defendant Charriez's Second Amended Counterclaim and Fathi Yusuf files an answer to Defendant Charriez's First Amended Third Party Complaint.**

## INSTRUCTIONS

If any of the following Interrogatories cannot be answered in full, please answer to the extent possible, specify the reason for your inability to answer the remainder and state whatever information or knowledge you have concerning the unanswered portion. Where your investigation is incomplete, give all information known as of the date of signing your answer. Where exact data is unavailable, supply estimated data, indicate that you have done so, and explain the basis on which the estimate was made.

If you decline to answer any interrogatory, or portion of any interrogatory, on a claim of privilege or other basis for withholding an answer, such as the work product doctrine, state each privilege or other basis for withholding claimed and describe in detail all foundational facts upon which you base such claim of privilege or basis for withholding.

It is requested that all copies of all documents identified in response be attached to the answers to the responses to these Interrogatories as an exhibit.

Please take notice that these Interrogatories are deemed to be continuing up to and including the first day of trial of this action. If at any time you or any person acting on your behalf obtains additional information called for by these Interrogatories between the time of your response and the time set for trial, please serve supplemental sworn answers setting forth such information.

The words "**and**," as well as "**or**," shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the specifications all responses which might otherwise be construed to be outside its scope.

Terms in the plural include the singular and terms in the singular include the plural; the use of one gender shall include all others as appropriate in the context. These interrogatories are continuing in nature so as to require **you, the Plaintiff**, to file

supplemental answers if any additional or different information responsive to these interrogatories is discovered or obtained subsequent to the filing of answers to these interrogatories.

### **TERMS AND MEANINGS**

The terms used in this Discovery have the following meaning:

As used herein, the term "**document(s)**" is used in its broadest sense to include, by way of illustration only and not by way of limitation, all originals and non-identical copies of any writing or any other tangible thing or data compilation in the custody, possession or control of the Plaintiff - whether printed, typed, reproduced by any process, written or produced by hand, including any graphic matter however produced or reproduced, or produced by any other mechanical means and all data, either electronic, magnetic, chemical, mechanical, or other form of data storage capable of being transformed into written or oral matter, including, but not limited to, CD-ROMs, DVDs, computer disks, Hard-drive computer storage mediums — including e-mails, letters, affidavits, filings, engineering studies and/or tests, reports, agreements, communications, correspondence, permits, accounting records, business records, contracts, letters of agreements, telegrams, mailgrams, memoranda, summaries and/or records of personnel or telephone conversations, diaries, calendars, forecasts, photographs, tape recordings, facsimiles, models, statistical statements, graphs, charts, plans, drawings, service and/or pump data, logs, minutes or records of meetings, minutes or records of conferences, reports and/or summaries of interviews, reports, conversations, summaries of investigations, opinions or reports of consultants, topographical or geological maps or surveys, appraisals, records, reports or summaries of negotiations, drafts of any document, revisions of drafts of any document, purchase orders, invoices, receipts,

original or preliminary notes, financial statements, accounting work papers, promissory notes, film, microfilm, microfiche, punch cards, slides, pictures, videotapes, moving pictures, computer programs, laboratory results, magnetic tapes or any other matter which is capable of being read, heard or seen with or without mechanical or electronic assistance.

**The parties have consented, pursuant to V.I. R. Civ. P. 5(b)(2)(E), to electronic service of all documents in this action including discovery requests and responses.**

"**Communication**" means any correspondence, contact, discussion, exchange, contract, or agreement between any two or more persons. Without limiting the foregoing, "communication" includes all documents, as defined above, telephone conversations, internet communications, e-mail, facsimile transmissions, voice mail, face-to-face conversations, meetings, and conferences.

**"United" or "United Corp"** shall mean the plaintiff United Corporation.

**"Charriez"** shall mean the defendant Wadda Charriez.

**INTERROGATORIES**

**ROG No. 1:** Please describe any conversation you had with Wally Hamed, representing his father, Mohammad Hamed's, interest in the Hamed-Yusuf Partnership pursuant to a power of attorney, *or* the Hamed-Yusuf Partnership, that authorized the current lawsuit, *United Corporation v Wadda Charriez*, Superior Court of the Virgin Islands, Division of St. Croix, No. 2013-CV-152. In addition to the description of the conversation, please provide the date, the approximate length of time the discussion too, where the discussion took place and who was present.

**Response:**

**ROG No. 2:** Please describe what process was in place during the timeframe from 2006 through 2012 that allowed employees of the United Corporation d/b/a Plaza Extra to record time for work activities conducted outside of the Plaza Extra stores, such as making bank deposits.

**Response:**

Dated: March 6, 2018



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### CERTIFICATE OF SERVICE

I hereby certify that on this 6<sup>th</sup> day of March, 2018, I served a copy of the foregoing Request for Interrogatories by email, as agreed by the parties, on:

Glenda Cameron, Esq.  
Law Offices of K.G. Cameron  
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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).



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**VERIFICATION**

I hereby certify under penalty of perjury that the facts contained in each of the foregoing responses to interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: \_\_\_\_\_, \_\_\_\_\_, 2018

\_\_\_\_\_ Attesting Individual

TERRITORY OF THE UNITED STATES VIRGIN ISLANDS

DISTRICT OF \_\_\_\_\_ ) ss.

On this, the \_\_\_\_ day of \_\_\_\_\_, 2018, 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