**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

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| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2012-CV-370** |
| *Plaintiff/Counterclaim Defendant*, |  |
|  vs.**FATHI YUSUF** and **UNITED CORPORATION** | **ACTION FOR DAMAGES, INJUNCTIVE RELIEF AND DECLARATORY RELIEF** |
|  |  |
| *Defendants and Counterclaimants,* vs. **WALEED HAMED, WAHEED** **HAMED, MUFEED HAMED, HISHAM HAMED,** **and PLESSEN ENTERPRISES, INC.**,  *Counterclaim Defendants.* | JURY TRIAL DEMANDED |
|  | Consolidated with |
| **WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED, | **Case No.: SX-2014-CV-287** |
|  |  |
|  *Plaintiff*, vs. | **ACTION FOR DECLARATORY****JUDGMENT** |
| **UNITED CORPORATION,**  | JURY TRIAL DEMANDED |
| *Defendant.**­­­­­­*­­**WALEED HAMED**,as the Executor of the Estate of MOHAMMAD HAMED,  *Plaintiff,*  vs.**FATHI YUSUF**,   *Defendant.* | Consolidated with**Case No.: SX-2014-CV-278****ACTION FOR DEBT AND CONVERSION**JURY TRIAL DEMANDED |
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**HAMED’S FIFTH REQUEST**

**FOR THE PRODUCTION OF DOCUMENTS 28-36 OF 50**

**TO YUSUF PURSUANT TO THE CLAIMS DISCOVERY PLAN OF 1/29/2018**

References to "Exhibits" are to the Exhibits to Yusuf's First Set Of Discovery served on Hamed on March 23, 2018.

**RFPDs 28 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 2.** Please produce any and all financial statements or applications for financing for United, as well as Fathi, Mike, Nejeh and Yusuf Yusuf or any company controlled more than 49%, submitted to any person or institution from September 17, 2006 to present.

**Response:**

**RFPDs 29 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 4.** Please produce copies of any accountings prepared by or on behalf of United or any member of the Hamed or Yusuf families in the Criminal Case to demonstrate the Partnership's or United's income.

**Response:**

**RFPDs 30 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 5.** Please produce copies of all original tax returns filed by United, Fathi, Mike, Nejeh and Yusuf Yusuf from 1986 to date.

**Response:**

**RFPDs 31 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 6.** Please produce copies of all documents including statements relating to any operating, savings, credit, investment, trust, escrow or other accounts in which United, Fathi, Mike, Nejeh and Yusuf Yusuf or any company which they have more than 49% control, have or had any interest in the Virgin Islands or elsewhere, including, but not limited to Jordan and West Bank, Palestine, from 1986 to date.

**Response:**

**RFPDs 32 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 7.** Please produce all documents relating to all assets of United, Fathi, Mike, Nejeh and Yusuf Yusuf as of September 12, 2012 and the value of such assets.

**Response:**

**RFPDs 33 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 8.** For any allocation set forth in Exhibits 1-5, please produce all underlying documents relating to any such allocation.

**Response:**

**RFPDs 34 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 9.** Please produce all documents relating to your claim that rent is due from the Partnership to occupying Bay 5 and Bay 8.

**Response:**

**RFPDs 35 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 10.** For any debts Yusuf claims are owed by the Partnership in Exhibit 6, please provide any documents or supporting evidence which supports these debts of the Partnership.

**Response:**

**RFPDs 36 of 50:**

**SUBSTANTIALLY THE SAME AS YUSUF RFPD 11.** As to the accounts of Fathi, Mike, Nejeh and Yusuf Yusuf, please produce copies of any and all bank or investment account statements for the period from September 17, 2006 to date.

**Response:**

**Dated:** March 25, 2018 A

**Carl J. Hartmann III, Esq.**

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**CERTIFICATE OF SERVICE**

 I hereby certify that on this 25th day of March, 2018, I served a copy of the foregoing by email (CaseAnywhere ECF), 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).

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