

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS/ST. JOHN**

UNITED CORPORATION,

Plaintiff,

v.

**WAHEED HAMED,
(a/k/a Willy or Willie Hamed),**

Defendant.

Case No. 2013-CV-101

ACTION FOR DAMAGES

JURY TRIAL DEMANDED

**DEFENDANT'S RESPONSES TO
REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. With respect to your answers or responses to the Plaintiff's First Set of Interrogatories, please identify and produce each, every, and all documents, reports, writings, recordings, or electronic records which relates in any way to this matter.

Object. Overly broad.

2. Please provide copies of all financial records, bank statements relating to the business listed as 5 Corner's Mini Mart in your 1992 Personal U.S. Tax Return. See Tax Return, attached as **Exhibit A**.

None.

3. Please provide copies of all financial records, including statements of account for all operating, savings, credit, or escrow accounts for the years 1986 through 2001.

None.

4. Please provide all documents, writings, and recordings relating to or supporting your Answer to Plaintiff's Complaint.

Object. Overly broad.

5. Please provide all documents, writings and recordings relating to our supporting your position in relationship to Defendants' affirmative defenses.

Object. Overly broad.

6. All documents, writings, and recordings relating to each exhibit you intend to introduce into evidence at the trial of this case.

Exhibits for trial have not been identified at this time. This response will be supplemented as trial approaches.

7. A copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by or on behalf of you, for any and all personal income (or loss) for the years 1986 through present.

Object as to relevance for years before 1990 or after 1992. To the extent these are in my possession, these have been provided.

8. A copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by, or on your behalf, for any and all **business/professional income** (or loss) for the years 1986 through present.

Object as to relevance for years before 1990 or after 1992. To the extent these are in my possession, these have been provided.

9. Copies of any and all bank account statements, for any and all bank accounts (**foreign and domestic**), held individually or jointly in your name, **held on your behalf by a third party**, or the name of any entity in which you have a legal interest from 1986 through present.

Object as to relevance for years before 1990 or after 1992. None.

10. A list of all accounts holding stocks, bonds, securities, or other negotiable instruments, not otherwise identified and/or provided pursuant to the above requests, held in your name, **and/or in the name of your wife, children, or other third parties**, in part or whole, or in which you have a financial, personal or business interest/stake.

Object as to relevance for years before 1990 or after 1992. None.

11. All of your bankbooks and bank statements (including savings and checking accounts) from 1990 through the present (include any statements for other accounts into which you deposit money).

Object as to relevance for years before 1990 or after 1992. None.

12. Any certificates of deposit you may have an interest in.

Object as to relevance for years before 1990 or after 1992. None.

13. Produce copies of all investment portfolios you ever held.

Object as to relevance for years before 1990 or after 1992. None.

14. All of your credit card statements from January 1990 to 2003.

Object as to relevance for years before 1990 or after 1992. None.

15. Deed(s), contract(s), lease(s), or other similar documentary evidence of your ownership of any interest in real property from January 1, 1986 to present.

Object as to relevance for years before 1990 or after 1992. Subject to that objection -- only my house, it was purchased in 1998 or 1999 one acre for me and one acre for Yusuf then we did an exchange for his Sky Line property that was in my father's name. Yusuf took the two parcels on Sky Line and I kept the two parcels in Estate Harmony -- even swap. The deeds are of record.

16. Copies of all statements from any account, including all online based accounts, issued from January 1st, 1986 to present in connection with any brokerage accounts, relating to any stocks, bonds, stock options, debentures, and mutual funds, or other financial investment you may have had.

Object as to relevance for years before 1990 or after 1992. None.

17. All written evidence of any interest you have had in any business from January 1, 1986 to present.

Object as to relevance for years before 1990 or after 1992. None.

18. All copies of loan applications you have applied for from 1986 to present.

Object as to relevance for years before 1990 or after 1992. None.

19. Copies of all statements, documents, receipts, slips, etc. regarding any gambling account, **including online gambling**, you have ever opened in the United States, Caribbean, or any other jurisdiction.

Object as to relevance for years before 1990 or after 1992. None.

RESPECTFULLY SUBMITTED,

Dated: February 12, 2014



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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of February, 2014, I served a copy of the foregoing Memorandum by email, as agreed by the parties, on:

Nizar A. DeWood
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2006 Eastern Suburb, Suite 101
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