

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

MOHAMMAD HAMED,

Plaintiff,

v.

UNITED CORPORATION,

Defendant.


Case No.: 2014-SX-CV- 287

ACTION FOR DAMAGES AND
DECLARATORY RELIEF

NOTICE OF FILING
PLAINTIFF HAMED'S INITIAL RULE 26 DISCLOSURES

COMES NOW the Plaintiff Mohammad Hamed (Hamed), by counsel, and hereby
notice of filing his Initial Disclosures pursuant to Rule 26.

Dated: December 15, 2015



Joel H. Holt, Esq.
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820

Carl J. Hartmann III, Esq.
Co-Counsel for Plaintiff
5000 Estate Coakley Bay, L-6
Christiansted, VI 00820

CERTIFICATE OF SERVICE

I hereby certify that on December 15, 2015 a true and accurate copy of the
foregoing was served by email, as agreed by the parties, on:

Gregory Hodges
Dudley, Topper and Feuerzeig
1000 Frederiksberg Gade – Box 756
St. Thomas, VI 00804

Nizar A. DeWood
The Dewood Law Firm
Eastern Suburb, Suite 101
Christiansted, VI 00820



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**ACTION FOR DAMAGES AND
DECLARATORY RELIEF**

PLAINTIFF HAMED'S INITIAL RULE 26 DISCLOSURES

COMES NOW the Plaintiff, by counsel, and hereby provides the following Self Disclosures pursuant to Rule 26 as follows:

Witnesses:

The following individuals may have information used to support Plaintiff's claims or defenses:

1. Fathi Yusuf
2. Maher Yusuf
3. Nejeh Yusuf
4. Yusuf Yusuf
5. Mohammad Hamed
6. Waleed Hamed
7. Waheed Hamed
8. Mufeed Hamed
9. Hisham Hamed
10. John Gaffney
11. Iman al ali
12. Mitchell S. Fuerst, Esq.
13. Christoper M. David
14. Joe DiRuzzo, Esq.
15. Frank Massabki, Esq.
16. Thomas M. David, Esq.
17. Jennifer Correa Riera
18. United Corporation 30(b)(6) witness
19. Witnesses who have been or will be disclosed by Defendant in this case
20. Rebuttal and/or impeachment witness
21. All parties to this case, including their employees
22. Witnesses who identify or authenticate documents or exhibits

Documents:

The following documents may be used to support Plaintiff's claims or defenses:

- 1) The attached disc and document index identifying the documents by bates number

Damages:

- 1) Declaratory Relief against United regarding the ownership rights of the plaintiff as to the three Properties in question, declaring that he has a 50% interest in these Properties;
- 2) An award of attorney's fees and costs against United; and
- 3) Any other relief the Court deems appropriate as warranted by the facts and the applicable law.

Insurance:

None

Dated: December 15, 2015



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Counsel for Plaintiff
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Co-Counsel for Plaintiff
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St. Thomas, VI 00804

Nizar A. DeWood

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Eastern Suburb, Suite 101
Christiansted, VI 00820

A handwritten signature in blue ink is positioned above a solid horizontal line. The signature is stylized and appears to be the initials 'NAD'.

Plaintiff's Initial Rule 26 Disclosures - Document Index

December 15, 2015

Bates Range

HAMD200103-HAMD200103
HAMD200104-HAMD200104
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