

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

FATHI YUSUF,

Plaintiff,

v.

PETER'S FARM INVESTMENT
CORPORATION, SIXTEEN PLUS
CORPORATION, MOHAMMAD A.
HAMED, WALEED M. HAMED,
WAHEED M. HAMED, MUFEED M.
HAMED, and HISHAM M. HAMED,

Defendants.


Case No.: ST-2015-CV-344

**ACTION FOR DISSOLUTION
AND OTHER RELIEF**

INDIVIDUAL HAMED DEFENDANTS' INITIAL RULE 26 DISCLOSURES

COME NOW the individual Hamed Defendants, by counsel, and hereby give notice of filing their Initial Disclosures pursuant to Rule 26.

Dated: December 18, 2015



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

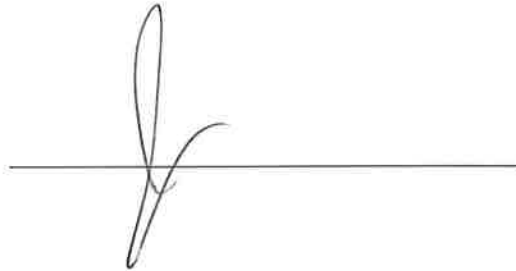
Carl J. Hartmann III, Esq.
Co-Counsel for Defendants
5000 Estate Coakley Bay, L-6
Christiansted, VI 00820

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2015 a true and accurate copy of the foregoing was served by email, as agreed by the parties, on:

Gregory Hodges
Stefan B. Herpel
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

A handwritten signature in black ink is positioned above a solid horizontal line. The signature is stylized and appears to be the name 'Nizar A. DeWood'.

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

FATHI YUSUF,

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CORPORATION, MOHAMMAD A.
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AND OTHER RELIEF

INDIVIDUAL HAMED DEFENDANTS' INITIAL RULE 26 DISCLOSURES

COME NOW the individual Hamed Defendants, by counsel, and hereby provide the following Self Disclosures pursuant to Rule 26 as follows:

Witnesses:

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

1. Fathi Yusuf
2. Maher Yusuf
3. Negeh Yusuf
4. Yusuf Yusuf
5. Fawzia Yusuf
6. Syaid F. Yusuf
7. Zayed F. Yusuf
8. Mohammad Hamed
9. Waleed Hamed
10. Waheed Hamed
11. Mufeed Hamed
12. Hisham Hamed
13. Yusef I. Jaber
14. Pablo O'Neill
15. Andrew Simpson, Esq.
16. Carl Beckstedt, Esq.
17. Peter's Farm Investment Corporation 30(b)(6) witness

18. Sixteen Plus 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 Defendants' claims or defenses:

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

Damages:

None

Insurance:

None

Dated: December 18, 2015



Joel H. Holt, Esq.

Counsel for Defendants

Law Offices of Joel H. Holt

2132 Company Street,

Christiansted, VI 00820

Carl J. Hartmann III, Esq.

Co-Counsel for Defendants

5000 Estate Coakley Bay, L-6

Christiansted, VI 00820

CERTIFICATE OF SERVICE

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Gregory Hodges
Stefan B. Herpel
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

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be the name 'Nizar A. DeWood'.

Defendants' Initial Rule 26 Disclosures - Document Index

December 18, 2015

Bates Range

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HAMD445225-HAMD445225
HAMD445232-HAMD445232
HAMD445278-HAMD445278
HAMD445286-HAMD445286
HAMD445801-HAMD445801
HAMD445876-HAMD445876
HAMD445909-HAMD445909
HAMD445920-HAMD445920
HAMD445956-HAMD445956
HAMD446020-HAMD446020
HAMD446026-HAMD446026
HAMD446029-HAMD446029
HAMD450635-HAMD450674
HAMD461889-HAMD461895

Bates Range

HAMD472766-HAMD472766
HAMD476041-HAMD476044
HAMD476041-HAMD476072
HAMD476047-HAMD476045
HAMD476048-HAMD476049
HAMD476050-HAMD476051
HAMD476052-HAMD476053
HAMD476054-HAMD476059
HAMD476060-HAMD476066
HAMD476067-HAMD476068
HAMD476069-HAMD476070
HAMD476071-HAMD476072
HAMD476304-HAMD476507
HAMD482838-HAMD483030
HAMD493359-HAMD493360
HAMD544451-HAMD544643
HAMD551151-HAMD551370
HAMD559643-HAMD559649
HAMD559920-HAMD559959
HAMD562328-HAMD562329
HAMD563327-HAMD563328
HAMD563333-HAMD563334
HAMD563339-HAMD563340
HAMD563345-HAMD563346
HAMD563351-HAMD563356
HAMD564413-HAMD564462
HAMD565528-HAMD565557
HAMD565564-HAMD565596
HAMD565598-HAMD565627
HAMD565629-HAMD565663
HAMD565671-HAMD565711
HAMD565721-HAMD565755
HAMD565770-HAMD565772
HAMD565776-HAMD565816
HAMD565861-HAMD565896
HAMD566532-HAMD566536
HAMD566537-HAMD566541
HAMD568450-HAMD568451
HAMD576863-HAMD576885
HAMD576973-HAMD576994
HAMD577076-HAMD577097

Bates Range

HAMD577179-HAMD577201
HAMD577282-HAMD577305
HAMD578460-HAMD578462
HAMD578466-HAMD578483
HAMD578536-HAMD578538
HAMD578542-HAMD578560
HAMD578573-HAMD578582
HAMD578609-HAMD578610
HAMD578614-HAMD578631
HAMD578671-HAMD578673
HAMD578677-HAMD578692
HAMD578719-HAMD578721
HAMD578734-HAMD578736
HAMD578739-HAMD578750
HAMD578761-HAMD578765
HAMD578791-HAMD578793
HAMD578796-HAMD578809
HAMD578873-HAMD578886
HAMD579318-HAMD579319
HAMD579321-HAMD579324
HAMD579325-HAMD579331
HAMD579332-HAMD579334
HAMD579336-HAMD579337
HAMD579339-HAMD579341
HAMD579354-HAMD579355
HAMD579357-HAMD579360
HAMD579377-HAMD579378
HAMD579380-HAMD579383
HAMD579396-HAMD579397
HAMD579399-HAMD579402
HAMD579419-HAMD579420
HAMD579422-HAMD579425
HAMD579436-HAMD579437
HAMD579439-HAMD579442
HAMD579462-HAMD579464
HAMD579467-HAMD579472
HAMD588461-HAMD588469
HAMD588507-HAMD588538
HAMD588539-HAMD588546
HAMD588584-HAMD588615
HAMD588616-HAMD588621

Bates Range

HAMD588628-HAMD588633
HAMD588665-HAMD588669
HAMD588670-HAMD588674
HAMD593236-HAMD593238
HAMD593241-HAMD593242
HAMD593281-HAMD593289
HAMD593292-HAMD593293
HAMD593330-HAMD593338
HAMD593343-HAMD593346
HAMD593378-HAMD593380
HAMD593439-HAMD593441
HAMD593442-HAMD593448
HAMD593475-HAMD593478
HAMD593479-HAMD593487
HAMD593518-HAMD593520
HAMD593521-HAMD593528
HAMD593559-HAMD593561
HAMD593562-HAMD593568
HAMD593608-HAMD593610
HAMD593611-HAMD593613
HAMD593614-HAMD593620
HAMD593653-HAMD593661
HAMD593694-HAMD593699
HAMD593700-HAMD593707
HAMD593745-HAMD593776
HAMD593787-HAMD593787
HAMD596061-HAMD596075
HAMD596076-HAMD596078
HAMD596079-HAMD596079
HAMD596080-HAMD596089
HAMD596090-HAMD596107
HAMD596108-HAMD59612
HAMD596126-HAMD596126
HAMD596127-HAMD596149
HAMD596150-HAMD596150
HAMD596151-HAMD596154
HAMD596155-HAMD596155
HAMD596156-HAMD59615
HAMD596157-HAMD596157
HAMD596195-HAMD596198
HAMD596199-HAMD596199

Bates Range

HAMD596200-HAMD596200
HAMD596201-HAMD596201
HAMD596202-HAMD596205
HAMD596206-HAMD596206
HAMD596207-HAMD596210
HAMD596273-HAMD596275
HAMD596276-HAMD596277
HAMD596278-HAMD596279
HAMD596280-HAMD596280
HAMD596281-HAMD596282
HAMD596283-HAMD596296
HAMD596301-HAMD596301
HAMD596308-HAMD596327
HAMD596328-HAMD596328
HAMD596329-HAMD596330
HAMD596331-HAMD596331
HAMD596491-HAMD596491
HAMD596492-HAMD596493
HAMD596502-HAMD596503
HAMD596504-HAMD596504
HAMD596508-HAMD596508
HAMD596509-HAMD596510
HAMD596511-HAMD596511
HAMD596512-HAMD596512
HAMD596518-HAMD596519
HAMD596536-HAMD596537
HAMD596549-HAMD596550
HAMD596563-HAMD596574
HAMD596578-HAMD596578
HAMD596702-HAMD596702
HAMD596703-HAMD596703
HAMD596704-HAMD596704
HAMD596705-HAMD596706
HAMD596707-HAMD596708
HAMD596709-HAMD596717
HAMD596718-HAMD596718
HAMD596719-HAMD596719
HAMD596720-HAMD596720
HAMD596730-HAMD596741
HAMD596742-HAMD596752
HAMD596793-HAMD596812

Bates Range

HAMD596813-HAMD596823
HAMD596825-HAMD596827
HAMD596837-HAMD596837
HAMD596838-HAMD596839
HAMD601921-HAMD601922
HAMD601925-HAMD601926
HAMD606941-HAMD606942
HAMD606952-HAMD606955
HAMD606956-HAMD606957
HAMD607496-HAMD607526
HAMD609081-HAMD609095
HAMD609116-HAMD609146
HAMD610601-HAMD610601
HAMD610603-HAMD610603
HAMD610606-HAMD610606
HAMD610607-HAMD610607
HAMD610609-HAMD610609
HAMD610611-HAMD610611
HAMD610613-HAMD610613
HAMD610616-HAMD610616
HAMD610619-HAMD610619
HAMD610620-HAMD610620
HAMD610622-HAMD610622
HAMD610623-HAMD610623
HAMD610625-HAMD610625
HAMD610626-HAMD610626
HAMD610627-HAMD610627
HAMD610629-HAMD610629
HAMD610632-HAMD610632
HAMD610634-HAMD610634
HAMD610639-HAMD610639
HAMD614994-HAMD614994
HAMD628896-HAMD628898
HAMD629004-HAMD629005
HAMD629185-HAMD629185