

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

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff/Counterclaim Defendant,

vs.

FATHI YUSUF and **UNITED CORPORATION**

Defendants and Counterclaimants.

vs.

**WALEED HAMED, WAHEED HAMED,
MUFEED HAMED, HISHAM HAMED, and
PLESSEN ENTERPRISES, INC.,**

Counterclaim Defendants,

Case No.: SX-2012-cv-370

**ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

JURY TRIAL DEMANDED

Consolidated with

Case No.: SX-2014-CV-287

**ACTION FOR DECLARATORY
JUDGMENT**

JURY TRIAL DEMANDED

Consolidated with

Case No.: SX-2014-CV-278

**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff,

vs.

UNITED CORPORATION,

Defendant.

WALEED HAMED, as the Executor of the
Estate of MOHAMMAD HAMED,

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

**HAMED'S REQUESTS TO ADMIT PURSUANT TO THE CLAIMS DISCOVERY
PLAN OF 1/29/2018, NOS. 1-3 OF 50 -- AS TO:**

**CLAIM H-13, HAMED'S PAYMENT OF TAXES IN CRIMINAL CASE,
CLAIM H-18, HAMED'S PAYMENT OF FREEDMAXICK INVOICES, &
CLAIM H-153, PAYMENT OF PROPERTY INSURANCE FOR UNITED**

Request to Admit 1 of 50:

Request to admit number 1 of 50 relates to Claim H-13 (previously identified as 210) – described in the claims list as "Hamed payment of taxes during criminal case."

Admit or deny that Fathi, Fawzia, Maher, Nejeh, Syaid, Zayed and Yusuf Yusuf's income taxes were paid with Partnership funds for the years 2002-2012, but the Hamed taxes were not paid with Partnership funds.

RESPONSE:

Request to Admit 2 of 50:

Request to admit number 2 of 50 relates to Claim H-18 (previously identified as 275) – described in the claims list as "KAC357 Inc. payment of invoices from FreedMaxick."

Admit or deny that the Partnership did not reimburse KAC357, Inc. for the invoices shown in Exhibit 275, of the Exhibits to JVZ Engagement Report, September 28, 2016, bates numbers JVZ-001240-JVZ-001241.

RESPONSE:

Request to Admit 3 of 50:

Request to admit number 3 of 50 relates to Claim H-153 (previously identified as 3009a) – described in the claims list as "Partnership funds used to pay United Shopping Center's property insurance."

Admit or deny that after 9/17/2006 the Partnership paid the United Shopping Center's property insurance -- which included protection for properties other than the Plaza East Store.

RESPONSE:

Dated: January 30, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of January, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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