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

**DIVISION OF ST. CROIX**

|  |  |
| --- | --- |
| **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 |
|  |  |

**HAMED’S SECOND REQUESTS TO ADMIT PER THE CLAIMS DISCOVERY PLAN OF 1/29/2018, NOS. 4-6 OF 50 AS TO YUSUF CLAIM Y-6**

**BLACK BOOK BALANCE OWED UNITED, Y-7 LEDGER BALANCES OWED UNITED AND Y-9 UNREIMBURSED TRANSFERS OWED UNITED**

**Request to Admit 4 of 50:**

Request to admit number 4 of 50 relates to Claim Y-6 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Black Book Balances Owed United.”

Admit or deny that claims listed in Exhibit G to Yusuf’s Original Claims, Relevant Black Book Entries, occurred in 1994 or earlier, and occurred more than six years before the FBI seized the document.

**Response:**

**Request to Admit 5 of 50:**

Request to admit number 5 of 50 relates to Claim Y-7 – as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Ledger Balances Owed United.”

Admit or deny that all of the claims listed in Exhibit H to Yusuf’s Original Claims, Ledger Sheets Reflecting United’s Payments for Plaza Extra, except for one transcaction for $3000, occurred in 1995 or earlier, and occurred more than six years before the FBI seized the document.

**Response:**

**Request to Admit 6 of 50:**

Request to admit number 6 of 50 relates to Claim Y-9 as described in Hamed’s November 16, 2017 Motion for a Hearing Before Special Master as “Unreimbursed Transfers from United.”

Admit or deny that the claims listed in Exhibit I to Yusuf’s Original Claims, Summary and Supporting Documentation of Unreimbursed Transfers from United, occurred in 1996, and occurred more than six years before the FBI seized the document.

**Response:**

**Dated:** February 9, 2018 **A**

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

*Co-Counsel for Plaintiff*

5000 Estate Coakley Bay, L6

Christiansted, Vl 00820

Email: carl@carlhartmann.com

Tele: (340) 719-8941

**Joel H. Holt, Esq.**

*Counsel for Plaintiff*

Law Offices of Joel H. Holt

2132 Company Street,

Christiansted, Vl 00820

Email: holtvi@aol.com

Tele: (340) 773-8709 Fax: (340) 773-867

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of February, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

**Hon. Edgar Ross**

Special Master

% edgarrossjudge@hotmail.com

**Gregory H. Hodges**

**Stefan Herpel**

**Charlotte Perrell**

Law House, 10000 Frederiksberg Gade

P.O. Box 756

St. Thomas, VI 00802

ghodges@dtflaw.com

**Mark W. Eckard**

Hamm, Eckard, LLP

5030 Anchor Way

Christiansted, VI 00820

mark@markeckard.com

**Jeffrey B. C. Moorhead**

CRT Brow Building

1132 King Street, Suite 3

Christiansted, VI 00820

jeffreymlaw@yahoo.com

**A**

**CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)**

This document complies with the page or word limitation set forth in Rule 6-1(e).

**A**