

**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.

**Y-2: RENTS FOR BAYS 5 & 8,
Y-12: FOREIGN ACCTS AND JORDANIAN PROPERTIES
H-157: UNCLEAR GENERAL LEDGER ENTRY REGARDING "FATHI YUSUF
REFUND OF OVERPAYMENT"
H-35: KAC357, INC.'S AMERICAN EXPRESS PAYMENTS DEPOSITED TO
PARTNERSHIP ACCOUNT**

Pursuant to the stipulated Joint Discovery Plan, as ordered by the Special Master on January 29, 2018, Hamed propounds the following Fifth Claims interrogatories relating to the claims listed below.

Interrogatory 29 of 50:

Interrogatory 29 of 50, relates to Claim Y-2: "Rents for Bays 5 & 8."

Please describe all facts related to this claim with reference to dates, documents, witnesses and what facts, conversations, writings, communications or other information or documents that leads United to believe and assert that it had an agreement with Hamed to pay rent for Bays 5 and 8. Include in your description the dates of the conversations, writings, communication or other documents, the place where these discussions or meetings took place and identify the participants to the discussions or meetings. Include in your response, but do not limit it to what facts, conversations, writings, communications or other information or documents that leads Yusuf to believe and assert that any consent for such an arrangement survived the bringing of a suit in September of 2012.

Response:

Interrogatory 30 of 50:

Interrogatory 30 of 50, relates to Y-12: "Foreign Accts and Jordanian Properties."

This interrogatory relates to Claim Y-12: "Foreign Accts and Jordanian Properties."

Please identify all foreign accounts and Jordanian properties that were funded or purchased with funds from the Plaza Extra supermarkets. For each such foreign account individually: include the name of the account, the account number, the name of the institution and its location, the date it was opened, how money generated by the Plaza Extra supermarkets got into the foreign account, the dates deposits and withdrawals were made from each account and the amounts, the date the last transaction on the account occurred, whether the account is active or closed. If open, provide the present balance and if closed, please identify the date the account closed and who closed it. For the Jordanian property, for each property individually please identify (in English) the date it was purchased, the name of the title holder, the property description, who presently owns the property, whether the purchase was in cash or was transferred from a bank, and how all funds generated or provided by the Plaza Extra supermarkets were transferred for the purchase of the property (including amounts and dates of all such transactions). **Response:**

Interrogatory 31 of 50:

Interrogatory 31 of 50 relates to Claim H-157 (old Claim No. 402/418): Unclear general ledger entry regarding 'Fathi Yusuf refund of overpayment,' as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.

This interrogatory relates to Claim H-157. Please describe in detail what the general ledger entry "West, 7/14/15, JE14, GENJ, YUSUF REFUND OF OVERPMT, \$77,335.62," references, including why Yusuf was entitled to a refund of overpayment in the amount of \$77,335.62, what the \$77,335.62 covers, a description of all documents supporting this transaction and identification of any witnesses and what knowledge you believe they have.

Response:

Interrogatory 32 of 50:

Interrogatory 32 of 50 relates to Claim No. H-35 (old Claim No. 343): "KAC357, Inc.'s American Express payments deposited to Partnership account," as described in Hamed's November 16, 2017 Motion for a Hearing Before Special Master, Exhibit 3 and the September 28, 2016 JVZ Engagement Report and Exhibits.

This interrogatory relates to Claim H-35. Describe all fact relevant to whether, after the Plaza Extra West store was transferred out of the Partnership, American Express payments to that Store were still being deposited into the Partnership Banco Popular account. Describe all facts relevant to whether this occurred due to an error in configuring the credit card processing machines on the part of the Banco Popular technician, or if not, why this occurred. Please explain any facts as to why tactical or legal basis as to why these amounts have not been reimbursed to KAC357, Inc. Include an identification of all documents or witnesses. If they have been reimbursed, please describe all documents that would substantiate the reimbursement, including, but not limited to, bank records.

Response:

Dated: February 25, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of February, 2018, I served a copy of the foregoing by email, as agreed by the parties, on:

Hon. Edgar Ross
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CERTIFICATE OF COMPLIANCE WITH RULE 6-1(e)

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



VERIFICATION

I hereby certify under penalty of perjury that the facts contained in each of the foregoing responses to interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: _____, _____, 2018

_____ Attesting Individual

TERRITORY OF THE UNITED STATES VIRGIN ISLANDS

DISTRICT OF _____) ss.

On this, the _____ day of _____, 2018, before me, the undersigned officer, personally appeared the signor known to me (or satisfactorily proven to be) the person whose name is subscribed to the within document and acknowledged that he/she executed the same for the purpose therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.

_____ Notary Public