

**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.

Pursuant to the stipulated *Joint Discovery Plan*, as ordered by the Special Master on January 29, 2018, Hamed propounds the following:

46. ADMIT or DENY that a *Joint Defense Agreement* was in effect until September 19, 2012, between defendants in *United States of America v United Corp., et. al.*, VI D.Ct. 2005-cr-015, and that the United Corporation, Fathi Yusuf, Maher Yusuf, Nejeah Yusuf, Waleed Hamed and Waheed Hamed were parties to that Joint Defense Agreement.

RESPONSE:

47. ADMIT or DENY all that legal and accounting work by the attorneys and accountants working under the Joint Defense agreement was on behalf of all represented defendants was paid for jointly when the Joint Defense Agreement was in effect in *United States of America v United Corp., et. al.*, VI D.Ct. 2005-cr-015.

RESPONSE:

48. ADMIT or DENY that a bill for attorneys' or accounting fees directed to a specific defendant did not reflect their individual personal obligation, as the bills were the joint obligation of all defendants while the Joint Defense Agreement was in effect in *United States of America v United Corp., et. al.*, VI D.Ct. 2005-cr-015.

RESPONSE:

49. ADMIT or DENY that at the time the criminal tax evasion prosecuted in *United States of America v United Corp., et. al.*, VI D.Ct. 2005-cr-015, to which United pled guilty, was undertaken, Fathi Yusuf was in charge of the finances for the Plaza Extra Partnership and created the criminal plan to skim grocery store funds which led to the criminal conviction.

RESPONSE:

Dated: March 31, 2018



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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of March, 2018, I served a copy of the foregoing by email (via CaseAnywhere), as agreed by the parties, on:

Hon. Edgar Ross

Special Master

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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