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

**DIVISION OF ST. CROIX**

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| **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 EIGHTH INTERROGATORIES PER THE CLAIMS DISCOVERY PLAN OF 1/29/2018, NO. 49 OF 50**

Pursuant to the stipulated *Joint Discovery Plan*, as ordered by the Special Master

on January 29, 2018, Hamed propounds the following Eighth Claims Interrogatories -- more particularly, interrogatory numbered 49 of 50, relating to Yusuf claim Y-10.

**Interrogatory 49 of 50:**

With regard to the post September 17, 2006 claims in Y-10, and more specifically your "J-2" Exhibit to *Yusuf’s Amended Accounting Claims Limited to Transactions Occurring on or after September 17, 2006*, dated October 30, 2017, explain in detail with reference to witnesses, documents, dates and amounts, why the claim and referenced exhibit reflect the following: there appears to be only one $2,000 amount (Maher) for withdrawals from the Partnership with a signed ticket/receipt and payments to third parties on behalf of Hamed/Yusuf with partnership funds for the Yusufs during the entire eight year period between 2006 and 2014 – where are all of those amounts; also, with regard to the attorney’s fees in BDO Table 38A you list five attorney’s fees checks as credits to Hamed—explain in detail why did you not include the four checks in BDO Table 38B as similar credits; also, why is the amount listed as owed by Waleed Hamed $1,778,103 rather than the $1,600,000 that has always been discussed and is listed in the August 15, 2012 letter referenced on Exhibit J-2?

**RESPONSE:**

**Dated:** March 31, 2018 A

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

*Co-Counsel for Plaintiff*

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 **Joel H. Holt, Esq.**

 *Counsel for Plaintiff*

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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

% edgarrossjudge@hotmail.com

**Gregory H. Hodges**

**Stefan Herpel**

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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).

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**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