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ADMITTED: USVI, NM & DC

June 7, 2018

Charlotte Perrell, Esq.
DTF
Law House
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By Email Only

RE: Request for Rule 37 Conference re Interrogatory 15 of 50 - Y-7 Ledger Entries

Dear Attorney Perrell

I write regarding the Yusuf/United 'claims discovery responses' served on May 15, 2018. It is Hamed's intention to file a motion to the Special Master regarding Interrogatory 15 of 50. Pursuant to Rule 37.1, we request that you provide a time and date when you are available to discuss the bases of the proposed motion, and seek amendment to the Yusuf response.

We do not understand how we can defend a claim on these ledger entries if your client will not answer as to the specifics of the claim. Thus, we propose one of three solutions: (1) Yusuf agrees to allow Hamed one each discovery request (interrogatory, RFA and RFPD) to be propounded and answered after you file the motion on this claim. Hamed's opposition would be due 14 days after your responses, (2) you tell us what detail you WILL provide on this interrogatory, and we negotiate to see if we can find a solution, or (3) we file another motion to compel and attach this email.

Please let me know which is the best for your client, and if it is #3, provide us with times and dates for the conference.

Interrogatory 15 of 50 - as to Claim Y-7 - Ledger Entries

Interrogatory 15 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" and Exhibit H to Yusuf's Original Claims, Ledger Sheet Reflecting United's Payments for Plaza Extra.

Please fully describe Exhibit H "Ledger Sheets Reflecting United's Payments for Plaza Extra," including, but not limited to, the physical location where this ledger sheet was found, who first found this ledger sheet, how this ledger sheet made it to its physical location, when the ledger sheet was placed in the location where it was found, whether the FBI ever had possession of this ledger sheet and if so, the dates of that possession, whether the ledger sheet is part of a larger document, and if so, the total number of pages in the larger document, an explanation of each entry on the ledger sheet, including, but not limited to, the date of each transaction reflected in each entry (including the year), a description of each entry (e.g., what is the name of the person the bedroom set in 1998 was purchased for), an explanation of why each entry is a business expense of the Partnership, and a description of the documents supporting each expenditure description (e.g., an invoice). Also, for each such entry, state the length of time that passed between each entry and the date the FBI seized the document - with a description of all bank, investment and other documents referenced in the exhibit or your explanation.

Response:

Defendants object to this Interrogatory because it is vague, ambiguous and compound such that the total number of Interrogatories together with their sub parts and other discovery exceeds the maximum allowable number of Interrogatories under the JDSP and violates both the spirit and the terms of the JDSP limiting the number of Interrogatory questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Carl J. Hartmann", with a long horizontal flourish extending to the right.

Carl J. Hartmann