

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

**DIVISION OF ST. CROIX**

<b>UNITED CORPORATION,</b>	)	Case No. SX-13-CV-03
	)	
	)	<b>PLAINTIFF'S FIRST REQUEST</b>
	)	<b>FOR PRODUCTION OF DOCUMENTS</b>
vs.	)	<b>TO DEFENDANT WALEED HAMED</b>
	)	
<b>WALEED HAMED,</b>	)	
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**PLAINTIFF'S FIRST REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO DEFENDANT WALEED HAMED**

TO: **Waleed Hamed**  
**c/o Mark W. Eckard, Esq.**  
**#1 Company Street**  
**P.O. Box 24849**  
**Christiansted VI 00824**

COMES NOW Plaintiff, by and through his undersigned counsel, Nizar A. DeWood, Esq. pursuant to LRCi 34 and Fed. R. Civ. P. 34, hereby propounds and serves the following request for the production of documents to be provided to the DeWood Law Firm, Esq., within thirty (30) days from the date of service hereof.

A. As used in this demand for production, unless it is otherwise provided or the context requires a different meaning, words importing the singular include and apply to several persons or things; words importing the masculine gender include the feminine; words used in the present tense include the future.

B. When used in this demand for production, the term "in writing" or "document" or "record" is defined to include all tangible things by which human communication is transmitted or stored, including but not limited to letters, reports,

memoranda, bank statements, studies, books, diaries, contracts, agreements, receipts, vouchers, ledgers, magnetic or phonographic recording, models, prototypes, statements, invoices, tickets, canceled checks, computer printouts, flowcharts, and other like or similar materials or items, custody or control (actual or constructive) of the Plaintiff.

C. Documents must be catalogued by number to correspond to the appropriate request.

D. Whenever you contend that a request calls for privileged information, you shall identify the privilege claimed by you, identify the subject matter to which your claim pertains, and with respect to documents identify each document subject to the claim privilege.

E. Whenever you wish to object for any reason to a request, you shall state the nature of your objections, identify the subject matter to which your objection pertains, and cite the legal rule upon which you rely in effecting your objection.

### **REQUEST FOR PRODUCTION OF DOCUMENTS**

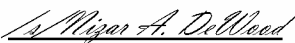
1. With respect to your answers or responses to the Plaintiff's First Set of Interrogatories, please identify and produce each, every, and all documents, reports, writings, recordings, or electronic records which relates in any way to this matter.
2. Please provide copies of all financial records, bank statements relating to each security/stock listed in your 1992 and 1993 tax returns.
3. Please provide copies of all financial records, including statements of account for all operating, savings, credit, or escrow accounts for the years 1986 through 2001.
4. Please provide all documents, writings, and recordings relating to or supporting your Answer to Plaintiff's Complaint.
5. Please provide all documents, writings and recordings relating to our supporting your position in relationship to Defendants' affirmative defenses.
6. All documents, writings, and recordings relating to each exhibit you intend to introduce into evidence at the trial of this case.
7. A copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by or on behalf of you, for any and all personal income (or loss) for the years 1986 through present.
8. A copy of all city, state, territorial and federal, tax returns (and other required tax filings), filed by, or on your behalf, for any and all **business/professional income** (or loss) for the years 1986 through present.
9. Copies of any and all bank account statements, for any and all bank accounts (**foreign and domestic**), held individually or jointly in your name, **held on your behalf by a third party**, or the name of any entity in which you have a legal interest from 1986 through present.
10. A list of all accounts holding stocks, bonds, securities, or other negotiable instruments, not otherwise identified and/or provided pursuant to the above requests, held in your name, **and/or in the name of your wife, children, or other third parties**, in part or whole, or in which you have a financial, personal or business interest/stake.
11. All of your bankbooks and bank statements (including savings and checking accounts) from 1990 through the present (include any statements for other accounts into which you deposit money).

12. Any certificates of deposit you may have an interest in.
13. Produce copies of all investment portfolios you ever held.
14. All of your credit card statements from January 1990 to present.
15. Deed(s), contract(s), lease(s), or other similar documentary evidence of your ownership of any interest in real property from January 1, 1986 to present.
16. Copies of all statements from any account, including all online based accounts, issued from January 1<sup>st</sup>, 1986 to present in connection with any brokerage accounts, relating to any stocks, bonds, stock options, debentures, and mutual funds, or other financial investment you may have had.
17. All written evidence of any interest you have had in any business from January 1, 1986 to present.
18. All copies of loan applications you have applied for from 1986 to present.
19. Copies of all statements, documents, receipts, slips, etc. regarding any gambling account, **including online gambling**, you have ever opened in the United States, Caribbean, or any other jurisdiction.

Date: November 15, 2013

**Respectfully Submitted,**

**DEWOOD LAW FIRM**  
Attorneys for Plaintiffs

By:   
Nizar A. DeWood, Esq.  
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**CERTIFICATE OF SERVICE**

**IT IS HEREBY CERTIFIED THAT** a true and exact copy of the foregoing *Plaintiff's First Requests For Production of Documents to Defendant Waleed Hamed* was served via U.S. Mail, postage prepaid, fax, electronic mail or hand delivery on this the \_\_\_\_ day of November 2013 to wit:

**Mark W. Eckard, Esq.**  
#1 Company Street  
P.O. Box 24849  
Christiansted VI 00824  
Email: mwe@gronereckard.com  
*Counsel for Defendant*

**via:** CM/ECF  | Mail  | Fax  | Hand Delivery  | Email

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Cordelia L. Jones  
Certified Paralegal