

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

YUSUF YUSUF, derivatively on behalf of PLESSEN ENTERPRISES, INC.,)	CASE # SX-13-CV-120
)	
Plaintiff,)	CIVIL ACTION FOR DAMAGES
)	AND INJUNCTIVE RELIEF
vs.)	
)	
WALEED HAMED, WAHEED HAMED, MUFEED HAMED, HISHAM HAMED, and FIVE-H HOLDINGS, LLC,)	NOTICE OF 30(b)(6)
)	VIDEO TAPED
)	DEPOSITION OF DEFENDANT
)	FIVE H. HOLDINGS, LLC
Defendants,)	
and-)	
)	
PLESSEN ENTERPRISES, INC.,)	
)	
Nominal Defendant.)	
)	

NOTICE OF 30(b)(6) VIDEO TAPED DEPOSITION

To: **FIVE H. HOLDINGS, LLC - Defendant**
c/o Carl Hartmann III, Esquire
5000 Estate Coakley Bay, #L-6
Christiansted, VI 00820
Tele: 340) 719-8941
Email: carl@carlhartmann.com

Caribbean Scribes, Inc.
2132 Company Street, Suite 3
Christiansted, St. Croix 00820-4944
Tele: (340) 773-8161
Email: a3klein@gmail.com

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Yusuf Yusuf, through his undersigned counsel, will take the oral deposition of Defendant **FIVE H. HOLDINGS, LLC** on **March 10th 2015, at the DeWood Law Firm, 2006 Eastern Suburb, Suite 102, Christiansted, V.I. 00820 at 10:00 a.m.** and continuing until it is adjourned or completed.

DEFINITIONS AND INSTRUCTIONS

Unless otherwise specified, the Notice shall be governed by the following definitions and instructions.

- A. "Documents" mean any written, printed, typed or graphic matter of any kind or nature however produced or reproduced, whether sent or received or neither, including all drafts and copies bearing notations, marks or matter not found on the original; it includes but is not limited to , all contracts, agreements, representations, warranties, opinions, amendments or modifications thereof; all letters or other forms of correspondence or communications, including but not limited to e-mails, notices, notes messages and reports studies, analyses, evaluations and all photographs.
- B. "You" means **FIVE H. HOLDINGS, LLC**.

The deponent specified should be the person or persons most knowledgeable about the issues set forth on **Exhibit A**. The deponent is requested to bring to the deposition any and all documents, relevant to any of the areas set forth above, and all other items relevant to the items listed above under your control not previously produced by you.

.Said depositions will be taken and recorded by VIDEOTAPE before a Notary Public commissioned by the Territory of the Virgin Islands or other person qualified to administer the oath and take depositions. Said depositions is being taken for use as evidence and for purpose of discovery of evidence and may be continued for day to day until completed.

Dated: February 4, 2015

Respectfully Submitted,

The DeWood Law Firm
Attorney for Plaintiff

By: 

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(VI Bar No. 1177)
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of February 2015, I caused the foregoing **NOTICE OF 30(b)(6) VIDEO TAPED DEPOSITION** to be served upon the following via e-mail and hand delivery.

Mark Eckard, Esquire
Eckard P.C.
#1 Company Street
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Carl Hartmann, III, Esq.
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EXHIBIT A

- 1. All documents relating to Plessen Enterprises, Inc. (“Plessen”) received from Bryant, Barnes and Moss, LLP, on February 26, 2003 pursuant to a written acknowledgement of receipt, or any time thereafter.**
- 2. All documents relating to or evidencing any authorization by the directors, officers or shareholders of Plessen for the issuance of a check dated March 27, 2013 in the amount of \$460,000 drawn on Plessen’s account and payable to Waleed Hamed (the “Check”).**
- 3. All documents relating to or evidencing the withdrawal, deposit, and disbursement of the proceeds of the Check.**
- 4. All documents relating to or evidencing the wiring of the proceeds of the Check to Attorney Gerry Groner and any other person or entity receiving any portion of the proceeds of the Check.**
- 5. All documents relating to or evidencing the source of funds for the \$230,000 deposited with the Clerk of the Court after the Complaint was filed in this matter.**
- 6. All documents relating to or evidencing any withdrawal of funds from Plessen’s bank accounts prior to March 27, 2013 for the personal use of Plessen’s directors, officers or shareholders.**
- 7. All documents relating to or evidencing the adoption of any By-Laws of Plessen, including any notices of meetings, minutes of meetings or resolutions.**