

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

YUSUF YUSUF, derivative on behalf of,
PLESSEN ENTERPRISES, INC.,

Plaintiff,

v.

WALEED HAMED, WAHEED HAMED,
MUFEED HAMED, HISHAM HAMED and
FIVE-H HOLDINGS,

Defendants,

and

PLESSEN ENTERPRISES, INC.,

Nominal Defendant

CIVIL NO.: SX-13-CV-120

ACTION FOR DAMAGES

**AMENDED
NOTICE OF VIDEOTAPE
DEPOSITION**

AMENDED NOTICE OF VIDEOTAPE DEPOSITION

TO: **Waleed Hamed**
c/o Mark Eckard, Esquire
#1 Company Street
Christiansted, VI 00824
Tele (340) 642-8784
Email: mark@markeckard.com

Caribbean Scribes, Inc.
2132 Company Street, Suite 3
Christiansted, St. Croix 00820-4944
Tele: (340) 773-8161
Email: scoursey27@gmail.com

Glenroy A. Roberts, Sr.
Photos by Glenroy
P.O. Box 25
Christiansted, St. Croix 00821
Tele: (340) 514-4495
Email: groyvi@gmail.com

PLEASE TAKE NOTICE, that pursuant to Rule 26 and 30 of the Federal Rules of Civil Procedure Plaintiff, Yusuf Yusuf, through his undersigned counsel will take the deposition of Defendant, **WALEED HAMED** on **Monday, April 6, 2015**, at the **DeWood**

Law Firm, 2006 Eastern Suburb, Suite 102, Christiansted, V.I. 00820 at 9:30 a.m. and continuing until it is adjourned or completed.

The deposition will be by oral examination before a notary public or duly authorized officer and will be recorded by sound, video, and stenographic means.

Pursuant to Fed. R. Civ. P. 30(b)(2) and 34 the deponent is requested to bring to the deposition the documents described in the attached **Exhibit A**.

Date: March 23, 2015

Respectfully submitted,

DeWood Law Firm
Counsel for Yusuf Yusuf

By:



Nizar A. DeWood, Esquire
2006 Eastern Suburb, Suite 102
Christiansted, St. Croix 00820
T. (340) 773-3444/ F.(888) 398-8428
Email: nizar@dewood-law.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of March, 2015, I caused a true and exact copy of the foregoing **AMENDED NOTICE OF VIDEOTAPE DEPOSITION** to be served on the below parties of record by email (as agreed to by the parties).

Mark Eckard, Esquire
P.O Box 24849
Christiansted, VI 00824
Tele: (340) 642-8784
Email: mark@markeckard.com
Attorney for Waleed Hamed

Jeffrey B.C. Moorhead, Esquire
1132 King Street
Christiansted, VI 00802
Tele: (340) 773-2539
Email: jeffreymlaw@yahoo.com
Attorney for Plessen Enterprises, Inc.



Christina F. Joseph

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.
8. All documents relating to or evidencing all meetings of directors, incorporators or shareholders of Plessen from the date of its incorporation to date.
9. All documents relating to or evidencing the composition of Plessen's Board of Directors from the date of its incorporation to date.
10. Copies of the 2011, 2012, and 2013, and 2014 Renewal Business License Application.
11. Copies of the 2012, 2012, and 2013, and 2014 of Plessen's Franchise Tax Returns.