

From: [Carl Hartmann](#)
To: "Rauna Stevenson"; "Jim Hymes"
Cc: "Charlotte Perrell"; sherpel@dnfvi.com; [Joel HOLT](#); pbayless@dnfvi.com; [Kim Japinga](#)
Subject: Rule 37 Request to Jim re Isam
Date: Sunday, September 18, 2022 1:48:00 PM

Jim:

Now that the new scheduling order and upcoming depositions of Manal, Isam and Jamil are happening, I'd like to get some more information that was sought but not provided in the prior discovery. First, pursuant to Rule 37, I would like to schedule a conference to discuss two interrogatory responses and a response to a request to admit from Isam. Actually, we can avoid this if he will fully answer interrogatory number 3-- and clarify the other two items if necessary

4. ADMIT that in 1997, BFC Island Appliance was owned at least in part by you, either directly or indirectly.

RESPONSE: DENY. [[This seems contradicted by the next answer below....]]

and

Interrogatory 2: Please state the name and address of each place you have worked or been self[1]employed between 1986 and 2017 and for each such place, please state: a) All of your job title(s) or position(s) b) Your rate(s) of pay c) The time you started and the time you left each such job Response: Between 1986 and 1989,

Response:

I was the self-employed owner of Sosamag Supermarket, Rue de General DeGaulle, French St. Maarten. Between 1986 and 2001 , **I was the manager/shareholder of Island Appliances**, Canigater Street, Dutch St. Maarten. Between 1996 and 2001 , I was the manager/shareholder of Dyson's Island Furniture, St. Maarten. Between 2001 to the present, I have been the manager/shareholder of Travel Inn Hotel, St. Maarten between 2010 - 2017 I have been the manager/shareholder of Simpson Bay suites, St. Maarten

Interrogatory 3: Please describe in detail all that you know about BFC Island Appliance, including but not limited to its location, years of operation, **ownership, location of its bank accounts, your relationship to it and its one of its owners/operators as well as the name and address of all of its other owners/operators.**

Response:

In 1986, I acquired Sosamag Supermarket in the French side of St. Maarten. The previous owner had an account with BFC Bank. I opened

an account with the same bank for Island Appliances sometime near the end of 1986, or the beginning of 1987. **[[Totally unresponsive...who owned it and in what percentages – and when]]**

Thus, we can have a conference or, alternatively, I would like to know the answer(s) to #3. What he knows about Island Furniture.

I want to know answers to exactly what is asked in the interrogatory. Who were the other shareholders (and their addresses at the time) if it was owned as a corporation? Was his father or other family members—and at what percentages? Third persons? All bank accounts?

CARL J. HARTMANN III
EMAIL: CARL@HARTMANN.ATTORNEY
TELEPHONE: (616) 416-0956
WEBSITE : WWW.HARTMANN.ATTORNEY