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July 19, 2017

James L. Hymes, III, Esquire
Law Offices of James L. Hymes, III, P.C.
P.O. Box 990
St. Thomas, VI 00804-0990

Sent by mail and email: jim@hymeslawvi.com

Re: Sixteen Plus v Manal Yousef et al., SX-16-CV-65

Dear Attorney Hymes:

I have reviewed your client's discovery responses and have several questions that I want to raise pursuant to Rule 37.

As for my client's Rule 34 document requests. I believe the following responses sent on July 14th are deficient for the following reasons:

- 1) While the response to Document Request 17 references a power of attorney from Manal Yousef to Jamil Yousuf, which is certainly covered by the description of "Communications" in the request, it has not been produced. Indeed, that POA should have been produced under Rule 26. Can you please produce that POA?
- 2) In response to Document Request 23, you promised to produce a privilege log. Can you please produce it?
- 3) In response to Document Request No. 24, you claimed that the production of the passport was (1) irrelevant and (2) should remain confidential. I do not think these objections are proper for the following reasons:
 - As for the relevancy objection, the requested documents are relevant to show (1) the extent of your client's travel since the mortgage and note in question were executed, which is an issue in this case to verify your client's credibility on her sworn statements regarding her travel and (2) to show that she can freely travel, contrary to your assertions in your Motion For a Protective Order.

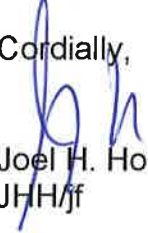
- As for the privacy issue, I am willing to sign a confidentiality agreement to alleviate her concerns, which I am glad to prepare, unless you would prefer to do so.

As for my client's Rule 33 document requests. In addition to the promised notary certification, I believe the following response sent on July 17th is deficient, but can be resolved in the following manner:

- Interrogatory 9-While your client objected to identifying bank and/or financial institution name and account numbers, I am willing to sign a confidentiality agreement to alleviate her concerns as to this information as well, which I am glad to prepare, unless you would prefer to do so.

Please let me know if you will agree to all of the above requests. If not, please consider this to be a Rule 37 request to have a meet and confer on these matters at any time other during the next 5 business days, at a time to be selected by you.

Cordially,



Joel H. Holt
JHH/jf