

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

**HISHAM HAMED**, derivatively, on behalf  
of **SIXTEEN PLUS CORPORATION**,

*Plaintiff,*

v.

**FATHI YUSUF, ISAM YOUSUF and  
JAMIL YOUSEF**

*Defendants,*

and

**SIXTEEN PLUS CORPORATION,**

*a nominal defendant.*

Case No.: 2016-SX-CV-650

**DERIVATIVE SHAREHOLDER  
SUIT, ACTION FOR DAMAGES  
AND CICO RELIEF**

**JURY TRIAL DEMANDED**

**PLAINTIFF'S REPLY TO YUSUF'S MOTION TO DISMISS**

The Plaintiff filed a First Amended Complaint on December 23, 2016, as permitted by Rule 15(a)(1)(B), so Yusuf's Rule 12 Motion to Dismiss the Complaint filed on December 5, 2016, is now moot.

**Dated:** December 23, 2016

  
\_\_\_\_\_  
**Joel H. Holt, Esq. (Bar # 6)**

*Counsel for Defendants*

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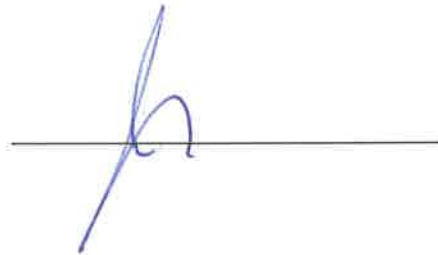
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### CERTIFICATE OF SERVICE

I hereby certify that on this 23<sup>rd</sup> day of December, 2016, I served a copy of the foregoing by mail and email, as agreed by the parties, on:

**Gregory H. Hodges**  
**Stephen Herpel**  
Law House, 10000 Frederiksberg Gade  
P.O. Box 756  
St. Thomas, VI 00802  
ghodges@dtflaw.com

A handwritten signature in blue ink is written over a horizontal line. The signature is stylized and appears to be the initials 'GH'.