

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

HISHAM HAMED , individually, and Derivatively, on behalf of SIXTEEN PLUS CORPORATION ,)	
)	
Plaintiff,)	CIVIL NO. SX-16-CV-650
)	
vs.)	DERIVATIVE SHAREHOLDER SUIT, ACTION FOR DAMAGES AND CICO RELIEF
)	
FATHI YUSUF, ISAM YOUSUF and JAMIL YOUSEF ,)	JURY TRIAL DEMANDED
)	
Defendants.)	
)	
and)	
)	
SIXTEEN PLUS CORPORATION ,)	
)	
a nominal Defendant,)	
)	

**NOTICE OF SERVICE OF
JAMIL YOUSUF'S RESPONSE TO PLAINTIFF HISHAM HAMED'S
FIRST REQUEST FOR ADMISSIONS TO DEFENDANT JAMIL YOUSEF**

The Defendant, **JAMIL YOUSUF** (incorrectly identified as Jamil Yousef in the Caption), by and through his undersigned attorneys, the Law Offices of James L. Hymes, III, P.C. (***James L. Hymes, III, of Counsel***), does not voluntarily appear in this matter, does not submit to the jurisdiction of the Court, and does not waive any objections to subject matter jurisdiction, personal jurisdiction, improper venue, insufficiency of process, insufficiency of service of process, or failure to state a claim upon which relief can be granted, or any other defense or objection which may be

HISHAM HAMED, Individually, and derivatively, on behalf of SIXTEEN PLUS CORPORATION vs.
FATHI YUSUF, ISAM YOUSUF and JAMIL YOUSEF
SCVI/STX Civil No. SX-16-CV-650
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presented whether by pleading or motion in this action, and pursuant to the provisions of V.I. R. Civ. P. 36, provides notice that his Response to Plaintiff Hisham Hamed's First Request for Admissions to Defendant Jamil Yousef has been served upon plaintiff's counsel, with copies to the remaining counsel of record as set forth in the Certificate of Service, below.

Respectfully Submitted,

DATED: August 16, 2017.

LAW OFFICES OF JAMES L. HYMES, III, P.C.
Counsel for Defendants –
Isam Yousuf, and Jamil Yousuf

By: 

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CERTIFICATE OF SERVICE

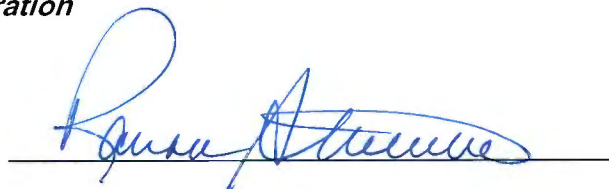
I hereby certify that this document complies with the page or word limitation set forth in V.I. R. Civ. P. 6-1(e), and that on this the 16th day of August, 2017, I caused an exact copy of the foregoing "*JAMIL YOUSUF'S RESPONSE TO PLAINTIFF HISHAM HAMED'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANT JAMIL YOUSEF*" to be served electronically by e-mail, and by mailing same, postage pre-paid, to the following counsel of record:

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Attorneys for Sixteen Plus Corporation



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**JAMIL YOUSUF'S RESPONSE TO PLAINTIFF HISHAM HAMED'S
FIRST REQUEST FOR ADMISSIONS TO DEFENDANT JAMIL YOUSEF**

The Defendant, JAMIL YOUSUF (incorrectly identified as Jamil Yousef in the Caption), through his undersigned Attorney, James L. Hymes, III, does not voluntarily appear in this matter, does not submit to the jurisdiction of the Court, and does not waive any objections to subject matter jurisdiction, personal jurisdiction, improper venue, insufficiency of process, insufficiency of service of process, or failure to state a claim upon which relief can be granted, or any other defense or objection which may be

presented whether by pleading or motion in this action, and without waiving same hereby responds to Plaintiff's First Request For Admissions as follows:

GENERAL OBJECTIONS

Jamil Yousuf submits and incorporates into each request the following general objections to Plaintiff's First Request for Admissions set forth herein, and further, by submitting his responses to the Plaintiff's Request for Admissions, does not waive any objections to subject matter jurisdiction, personal jurisdiction, service of process, improper venue, insufficiency of process, insufficiency of service of process, or failure to state a claim upon which relief can be granted, or any other defense or objection which may be presented whether by pleading or motion in this action:

1. Jamil Yousuf objects to each request contained in Plaintiff's First Request for Admissions to the extent such request asks for communications between him and his lawyers; these attorney-client communications are privileged and not subject to disclosure.

2. Jamil Yousuf objects to each request contained in Plaintiff's First Request for Admissions to the extent such request asks for disclosure of material prepared by or for his lawyers or his representatives in the course of securing legal counsel, or in anticipation and defense of litigation; this material is protected from disclosure by the work product doctrine. Similarly, Jamil Yousuf objects to each request contained in Plaintiff's First Request for Admissions to the extent such request asks for communications between him and his lawyers on the grounds of the privilege afforded to parties with a common interest or joint defense.

3. Jamil Yousuf has made the following responses without waiving: (1) the right to object to the use of any response for any purposes, in this action or in any other actions, on the grounds of privilege, relevance, materiality, or anything else appropriate; (2) the right to object to any other requests involving or relating to the subject matter of this response; and (3) the right to revise, correct, supplement, or clarify these responses should his ongoing investigation in defense of this action warrant such changes.

4. Jamil Yousuf generally objects to any request that purports to impose requirements more burdensome and beyond the scope of those set forth under the Federal Rules of Civil Procedure, including without limitation Rule 36. Furthermore, objection is made to each and every request that is uncertain as to time and purports to request admissions as to facts or circumstances unrelated in time to any issue or claim in this action.

ADMISSIONS

1. **ADMIT** that Isam Yousuf is your father.

RESPONSE:
ADMIT.

2. **ADMIT** that you are related to Manal Yousef.

RESPONSE:
ADMIT.

3. **ADMIT** that Fathi Yousef is related to Manal Yousef.

RESPONSE:

ADMIT.

4. **ADMIT** that Manal Yousef is the sister of Isam Yousuf.

RESPONSE:

ADMIT.

5. **ADMIT** that on February 19, 1997, Manal Yousef physically resided at 25 Gold Finch Road, Pointe Blanche, St. Martin N.A.

RESPONSE:

In late 1991, Manal Mohammad Yousef moved to St. Maarten with her husband and stayed at 25 Gold Finch Road for approximately two (2) months. I have no personal recollection of whether or not she in fact lived at that address on February 19, 1997, and therefore deny Request for Admissions No. 5.

6. **ADMIT** that on May 18, 2010, Manal Yousef physically resided at 25 Gold Finch Road, Pointe Blanche, St. Martin N.A.

RESPONSE:

DENY. See Response to Request for Admissions No. 5, above.

7. **ADMIT** that you have worked for BFC Island Appliance from time to time since 2008.

RESPONSE:

DENY.

8. **ADMIT** that your father, Isam Yousuf, is an owner of BFC Island Appliances.

RESPONSE:

DENY.

9. **ADMIT** that you are involved in helping Fathi Yusuf deprive Sixteen Plus of the value of the Diamond Keturah property secured by the Mortgage attached hereto as Exhibit 1.

RESPONSE:

DENY.

10. **ADMIT** that you expect to be compensated for helping Fathi Yusuf deprive Sixteen Plus of the value of the Diamond Keturah property secured by the Mortgage attached hereto as Exhibit 1.

RESPONSE:

DENY as a false statement of fact.

11. **ADMIT** that you helped Fathi Yusuf get Manal Yousef to sign the Power of Attorney in favor of Fathi Yusuf, attached as Exhibit 2.

RESPONSE:

DENY as a false statement of fact.

12. **ADMIT** that you helped Fathi Yusuf meet with the lawyer who send the letter on behalf of Manal Yousef, attached as Exhibit 3.

RESPONSE:

DENY as a false statement of fact.

13. **ADMIT** that you spoke personally with Manal Yousef who asked you to sign the affidavit attached as Exhibit 4.

RESPONSE:

ADMIT.

14. **ADMIT** that you never have spoken personally with Manal Yousef since April 4, 2016.

RESPONSE:

DENY as a false statement of fact.

15. **ADMIT** that you were asked by Isam Yousuf to sign the affidavit attached as Exhibit 4.

RESPONSE:

DENY as a false statement of fact.

16. **ADMIT** that you were asked by Fathi Yusuf to sign the affidavit attached as Exhibit 4.

RESPONSE:

DENY as a false statement of fact.

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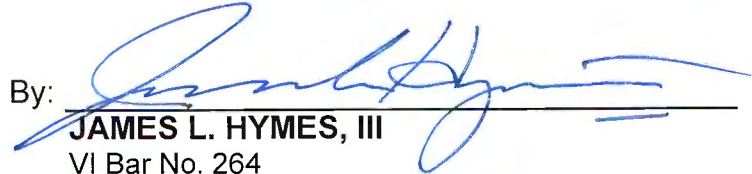
Respectfully Submitted,

DATED: August 16, 2017.

LAW OFFICES OF JAMES L. HYMES, III, P.C.

Counsel for Defendants –

Isam Yousuf, and Jamil Yousuf

By: 

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rauna@hymeslawvi.com

CERTIFICATE OF SERVICE

I hereby certify that on this the 16th day of August, 2017, I caused an exact copy of the foregoing "*JAMIL YOUSUF'S RESPONSE TO PLAINTIFF HISHAM HAMED'S FIRST REQUEST FOR ADMISSIONS TO DEFENDANT JAMIL YOUSEF*" to be served electronically by e-mail, and by mailing same, postage pre-paid, to the following counsel of record:

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Co-Counsel for Plaintiff

HISHAM HAMED, Individually, and derivatively, on behalf of SIXTEEN PLUS CORPORATION vs.

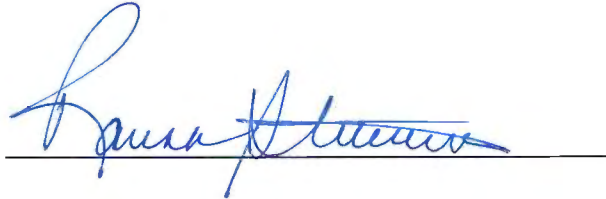
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