

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

SIXTEEN PLUS CORPORATION,)	
)	Civil No. SX-16-CV-65
Plaintiff,)	
)	ACTION FOR
v.)	DECLARATORY JUDGMENT
)	
MANAL MOHAMMAD YOUSEF,)	
)	
Defendant.)	

PLAINTIFF’S FIRST SET OF REQUESTS FOR ADMISSIONS

Sixteen Plus Corporation, by and through its undersigned counsel, propounds the following First Set of Requests for Admissions pursuant to Rule 36 of the Federal Rules of Civil Procedure on the defendant, Manal Yousef.

TERMS AND MEANINGS

"**Yusuf**" shall mean Fathi Yusuf.

"**You**" shall mean the defendant Manal Yousef.

REQUESTS FOR ADMISSIONS

1. ADMIT OR DENY that Fathi Yusuf is related to you by birth or marriage.
2. ADMIT OR DENY that Fathi Yusuf is your uncle.
3. ADMIT OR DENY that Isam Yousef is related to you by birth or marriage.
4. ADMIT OR DENY that Isam Yousef is your brother.
5. ADMIT OR DENY that Jamil Yousef is related to you by birth or marriage.
6. ADMIT OR DENY that Jamil Yousef is your nephew.
7. ADMIT OR DENY that you resided in St. Martin in 1997.
8. ADMIT OR DENY that prior to February 13th of 1997 you personally never earned more than one million dollars in wages or investment income.
9. ADMIT OR DENY that prior to February 13th of 1997 you personally never earned more than one million dollars in wages.

10. ADMIT OR DENY that prior to February 13th of 1997 you personally never earned more than one million dollars in investment income.

11. ADMIT OR DENY that prior to February 13th of 1996 you personally never earned more than two million dollars in wages.

12. ADMIT OR DENY that prior to February 13th of 1996 you personally never earned more than two million dollars in investment income.

13. ADMIT OR DENY that prior to February 13th of 1996 you personally never earned more than two million dollars in investment income plus wages.

14. ADMIT OR DENY that prior to February 13th of 1997 you personally never earned more than three million dollars.

15. ADMIT OR DENY that prior to February 13th of 1997 you personally never earned more than four million dollars.

16. ADMIT OR DENY that prior to February 13th of 1997 you personally never had more than one million dollars in assets in your bank or brokerage accounts.

17. ADMIT OR DENY that prior to February 13th of 1997 you personally never had more than two million dollars in assets in your bank and brokerage accounts.

18. ADMIT OR DENY that prior to February 13th of 1997 you personally never had more than three million dollars in assets in your bank and brokerage accounts.

19. ADMIT OR DENY that prior to February 13th of 1997 you personally never had more than four million dollars in assets in your bank and brokerage accounts.

20. ADMIT OR DENY that Fathi Yusuf supplied you with an unsigned version of the Power of Attorney attached hereto as Exhibit A.

21. ADMIT OR DENY that Fathi Yusuf had someone other than him provide you with an unsigned version of the Power of Attorney attached hereto as Exhibit A.

22. ADMIT OR DENY that Fathi Yusuf asked you to sign the Power of Attorney attached hereto as Exhibit A.

23. ADMIT OR DENY that Isam Yousef asked you to sign the Power of Attorney attached hereto as Exhibit A.

24. ADMIT OR DENY that Jamil Yousef asked you to sign the Power of Attorney attached hereto as Exhibit A

25. ADMIT OR DENY that you lived in St. Martin at the time you signed the Power of Attorney attached hereto as Exhibit A.

26. ADMIT OR DENY that you were physically on St. Martin and personally appeared before the notarizing official when you signed the Power of Attorney attached hereto as Exhibit A.

27. ADMIT OR DENY that you executed the Power of Attorney attached hereto as Exhibit A as shown on that document.

Respectfully submitted,

HAMMECKARD, LLP

Dated: February 22, 2017

By:  _____

Mark W. Eckard (VI Bar No. 1051)
5030 Anchor Way, Suite 13
Christiansted, VI 00820-4692
Telephone: (340) 514-2690
Facsimile: (855) 456-8784
Email: meckard@hammeckard.com

Counsel to Sixteen Plus Corporation

CERTIFICATE OF SERVICE

I certify that, on the 22nd day of February, 2017, I caused a true and correct copy of the foregoing document to be served upon Kye Walker, Esquire via United States Mail, postage prepaid, to 2201 Church Street, Suite 6, Christiansted, VI, 00820 and via email to kye@thewalkerlegalgroup.com.



REAL ESTATE POWER OF ATTORNEY

KNOW ALL PERSONS BY THESE PRESENTS, that I, Manal Mohamad Yousef, of 25 Gold Finch Road, Pointe Blanche, St. Martin, N.A., have made, constituted and appointed and by these presents do make, constitute and appoint Fathi Yusuf, of P. O. Box 503358, St. Thomas, VI 00804, my true and lawful attorney ["Attorney"], for me and in my name, place and stead, and on my behalf, and ~~for~~ my use and benefit:

To do and perform all and every act and thing whatsoever requisite and necessary to be done in relation to my interest as a Mortgagee/Lender in the real property located on St. Croix, U.S. Virgin Islands, the legal description of which is attached hereto as Exhibit A.

Said acts and things include, but are not limited to all of those powers enumerated in Title 15 Virgin Islands Code, Uniform Power of Attorney Act § 5-604, the execution and delivery of any and all documents such as a Release, Ratification, Assignment, Closing Statement, contracts, affidavits, and any other documents necessary to do all acts related to my interest in said property, including prosecuting foreclosure in my name, as I might or could do if personally present, with full power of substitution and revocation, hereby ratifying all that my said attorney shall lawfully do or cause to be done by virtue thereof.

The rights, powers and authority of said attorney-in-fact granted in this instrument shall commence upon the date of execution of this instrument and shall be in and remain in full force and effect until terminated by me in writing and filed in the Recorder of Deeds office wherein said property is situated. I hereby agree to release, indemnify, defend and hold my attorney-in-fact harmless for all claims arising by reason of his acts he so performs in accordance with this instrument and the law.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this _____ day of _____, 2010.

WITNESSETH:

[Handwritten signatures of witnesses]

[Handwritten signature of Manal Mohamad Yousef]
MANAL MOHAMAD YOUSEF



EXHIBIT A

1. Parcel No. 8, Estate Cane Garden, of approximately 2.6171 U.S. Acres.
2. Remainder No. 46A, Estate Cane Garden, of approximately 7.6460 U.S. Acres.
3. Parcel No. 10, Estate Cane Garden, of approximately 2.0967 U.S. Acres.
4. Road Plot No. 11, Estate Cane Garden, of approximately 0.0968 U.S. Acres.
5. Parcel No. 11, Estate Retreat, Matr. No. 37B of Company Quarter and Peter's Bridge, Matr. No. 37A and 37BA, Company Quarter, and No. 54 Queen's Quarter all of approximately 42.3095 U.S. Acres.
6. Remainder Matr. 32B, Estate Cane Garden of approximately 48.5173 U.S. Acres.
7. Parcel No. 9 Estate Cane Garden, of approximately 11.9965 U.S. Acres.
8. Remainder Matr. 32A, Estate Cranard, of approximately 41.0736, U.S. Acres.
9. Parcel No. 40, Estate Cranard of approximately 14.9507 U.S. Acres.
10. Remainder Matr. No. 31, Estate Diamond, of approximately 74.4220 U.S. Acres.
11. Parcel No. 4, Estate Diamond, of approximately 5.8662 U.S. Acres.
12. Parcel No. 1, Estate Diamond, of approximately 61.2558 U.S. Acres.
13. Parcel No. 3, Estate Diamond, of approximately 6.9368 U.S. Acres.
14. Parcel No. 2, Estate Diamond, of approximately 6.5484 U.S. Acres.
15. Road Plot No. 12, Estate Cane Garden, of approximately 0.4252 U.S. Acres.
16. Road Plot No. 41, Estate Cranard, of approximately 0.4255 U.S. Acres.
17. Road Plot No. 6, Estate Diamond, of approximately 0.8510 U.S. Acres.



20th Feb
 2:51 PM
 Recorded and Entered in Recorder's Book for the
 District of St. Croix, Virgin Islands of the U.S.A. at
 Page 1779
 No. 11021543 and noted in Real Property Records
 II: 32; 166 Page 227; 156; 364; 305 + 306
[Signature]
 20th Feb 2010



التجديدات
RENEWALS

Signature area with dotted lines.

توقيع صاحب الجواز
SIGNATURE OF HOLDER

THE HASHEMITE KINGDOM OF JORDAN المملكة الأردنية الهاشمية

	جواز سفر Passport	Type / نوع P	رمز دولة / Country Code JOR	رقم جواز سفر / Passport No. T518558
	الاسم / Name MANAL MOHAMMAD YOUSEF MOHAMMAD منال محمد يوسف محمد		تاريخ الميلاد / Date of Birth 1968	مكان الميلاد / Place of Birth AMMAN عمان
	النوع / Sex F	اسم الأم / Mother's Name MASOUDEH	تاريخ التوقيع / Date of Issue 21 MAY 2008	مكتب التوقيع / Authority AMMAN عمان
	تاريخ الانتهاء / Date of Expiry 20 MAY 2013	العنوان / Address Holland هولندا		

Non Machine Readable غير مقروء آليا

