

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

SIXTEEN PLUS CORPORATION,)
)
 Plaintiff,)
 v.)
MANAL MOHAMMAD YOUSEF,)
)
 Defendant.)
_____)

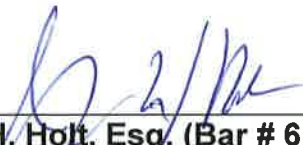
Civil No. **SX-16-CV-65**
ACTION FOR
DECLARATORY JUDGMENT

REPLY TO DEFENDANT’S MOTION TO STAY

In her reply to the disqualification motion, the Defendant improperly added a new motion to stay these proceedings. The request to stay a ruling pending certain requested discovery on the disqualification motion is without merit. The clarity of the law on the disqualification issue makes it clear that no such discovery is needed.¹

An identical reply has been filed in the companion case, SX-16-CV-65, where a similar motion to stay was filed. See **Exhibit 3**.

Dated: January 16, 2018



Joel H. Holt, Esq. (Bar # 6)
Counsel for Plaintiff
Law Offices of Joel H. Holt
2132 Company Street,

¹ Such discovery, if ordered, would involve deposing all counsel and their clients, not just counsel for the Plaintiff and his new associate, Robin Seila, as the issue of waiver would also have to be explored if this Court does not think the motion can be resolved without discovery, as Fathi Yusuf (who controls Manal Yousef) *waived* any such objection to disqualification through his counsel. See **Exhibit 1**. Indeed, several counsel have inadvertently used one of Holt’s other email accounts, including himself, as well as opposing counsel who tried to breach the “Chinese Wall” themselves by sending emails to Holt’s AOL account and Office Gmail account, rather than the account set up for these filings See **Exhibit 2**. However, such “mistakes” were anticipated, so counsel made sure these “mistakes” did not affect this “wall”, **as he has made sure Seila does not have access to either of these email accounts by not sharing his passwords with her.** See **Exhibit 2**.

Christiansted, VI 00820
Email: holtvi@aol.com
T: (340) 773-8709
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Mark Eckard, Esquire
5030 Anchor Way, Ste. 13
Christiansted, VI 00820
Telephone: (340) 773-6955
Email: meckard@hammeckard.com
Counsel to Sixteen Plus Corporation

CERTIFICATE OF SERVICE

I hereby certify that *this document complies with the page or word limitation set forth in Rule 6-1(e)*, and that on this 16th day of January, 2018, I served a copy of the foregoing by hand delivery and email, as agreed by the parties,

James Hymes VI
Bar No. 264
Counsel for Manal Yousef
P.O. Box 990
St. Thomas, Virgin Islands 00804-0990
jjm@hymeslawvl.com
rauna@hymeslawvi.com

A handwritten signature in blue ink, appearing to read 'JHymes', is written over a horizontal line.

EXHIBIT 1

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

MOHAMMAD HAMED, by his
authorized agent **WALEED HAMED**,

Plaintiff/Counterclaim Defendant,

vs.

FATHI YUSUF and UNITED CORPORATION,

Defendants and Counterclaimants.

vs.

**WALEED HAMED, WAHEED HAMED,
MUFEEED HAMED, HISHAM HAMED, and
PLESSEN ENTERPRISES, INC.,**

Counterclaim Defendants,

Case No.: SX-2012-cv-370

**ACTION FOR DAMAGES,
INJUNCTIVE RELIEF AND
DECLARATORY RELIEF**

JURY TRIAL DEMANDED

MOHAMMAD HAMED,

Plaintiff,

vs.

FATHI YUSUF,

Defendant.

Case No.: SX-2014-CV-278

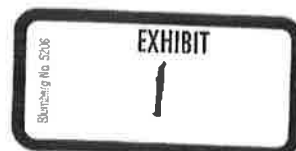
**ACTION FOR DEBT AND
CONVERSION**

JURY TRIAL DEMANDED

DECLARATION OF JOEL H. HOLT

I, Joel H. Holt, declare, pursuant to V.I. R. CIV. P. 84, as follows:

1. I am counsel for the Plaintiff and am personally familiar with the facts set forth herein.
2. I made a decision to look into the possibility of hiring Robin Seila in June of 2017.
3. I first discussed this with Waleed ("Wally") Hamed, who agreed for me to do so as long as I cleared it with Fathi Yusuf.



4. In this regard, by that date I had represented the Hamed family in this litigation for over five years and neither Wally nor I wanted to do anything that would jeopardize my ability to represent the Hameds.
5. I called Attorney Hodges on June 2, 2017, to ask him to consult with his client, Fathi Yusuf, as to whether Mr. Yusuf would have any objection to my continuing in the Yusuf/Hamed litigation if I were to reach an agreement with Judge Brady's then law clerk, Robin Seila, to work for my firm. I specifically told Attorney Hodges that I would not pursue hiring her if his client had any such objection, as my fiduciary duties to represent the Hamed family might be compromised if my representation of them was questioned, particularly in light of the extensive work on this case over the last four plus years. In short, I wanted to know his client's position, not his, as Attorney Hodges could not waive any objection his client might have.
6. Attorney Hodges agreed to speak with his client and call me the following Monday, June 5, 2017.
7. When I had not heard from him by mid-afternoon on June 5th, I sent him an email, stating in part as follows: "Once you have a response to my call last week, let me know." Attorney Hodges responded that same day as follows: "Will do. Instead of today, may I call you tomorrow afternoon?" All emails referenced herein are attached hereto as **Exhibit A**, which are identical to the emails produced by the Defendants with their motion.
8. When we spoke the next day, Attorney Hodges said his client would not object if I hired Judge Brady's law clerk.
9. At no time did Attorney Hodges say or suggest that he would be "displeased" if I hired Judge Brady's law clerk. Had he said any such thing, I would not have proceeded further.
10. To the contrary, the only point Hodges noted was to make sure I implemented appropriate screening measures.
11. I relied on this waiver, calling Judge Brady's chambers the same day, or shortly thereafter, to obtain his permission to discuss employment with Seila. Judge Brady's secretary answered the phone when I called his chambers and asked to speak with Judge Brady. She asked what I wanted to discuss with the Judge. After I told her, she put me on hold and then came back a few minutes later, informing me that Judge Brady said I had his permission to speak with his law clerk.
12. Shortly thereafter, I began to negotiate with Robin Seila about the possibility of working as an associate in my firm.

13. At the very outset, Robin Seila agreed she would cease work on all cases before Judge Brady where I was counsel of record.

14. A formal agreement was reached on July 10, 2017. The signed contract contained this provision:

Conflicts

Attorney has been a law clerk for Superior Court Judge Douglas Brady for the past several years. As such, the Attorney not only cannot work on any such cases, but the Attorney and the Firm shall establish a "Chinese Wall" regarding all communications, client contacts and all related activities involving any such files. Both the Firm and the Attorney shall make sure all appropriate safeguards are in place to avoid any the breach of any confidential information of the Firm, the clients involved or the Court.

15. Indeed, Robin Seila confirmed she had stopped all such work as soon as our employment negotiations began.

16. On July 26, 2017, Attorney Hodges emailed me asking about the status of my negotiation with Robin Seila, as well as what screening measures I planned to implement. My email response, included in **Exhibit A**, began with a reminder to Attorney Hodges that I had cleared all of this with him first. I then provided the information he requested, confirming that I had hired her and then listing a set of proposed screening measures. I also invited him to suggest any others he had in mind.

17. Attorney Hodges never responded to this July 26th email verbally or in writing.

18. Prior to the commencement of Robin Seila's employment on October 30, 2017, I took the following steps to set up the screening process, commonly known as a Chinese Wall:

- I removed over 95% of the Hamed files from the office and placed them in storage so they would not be in the office.
- I then placed the remaining files in my office, as opposed to the file cabinets in the common areas of my office where files are normally kept, which I then locked so they could not be accessed without my knowledge.
- I had an IT person then remove all of the Hamed files from the office public server and place them on a separate server so they could not be accessed by Robin Seila once she began work.
- I set up separate email accounts to use for the Hamed cases so they could not be accessed by Robin Seila. I also made sure she would not have access to any passwords for my email accounts.
- I then met with my office staff, which consists of three people, and discussed what a Chinese Wall meant and how they should coordinate

those efforts by making sure she did not see any new pleadings or correspondence, and could not access any old files. They were also instructed not to discuss the Hamed case with her at any time.

- I made it clear to the staff and the client that there was to be no communications between the client and Robin Seila whatsoever.

19. On October 27, 2017, I sent a list of these items to Attorney Hodges. The letter is attached hereto as **Exhibit B**, which is the same letter produced by the Defendants with their motion.

20. Attorney Hodges never responded to this October 27th letter verbally or in writing.

21. I made sure all of the referenced procedures were in place when Robin Seila began work on October 30, 2017, and have continued to monitor full compliance by my staff and Attorney Seila since that time.

I declare under penalty of perjury that the foregoing is true and correct, executed on this 14th day of December, 2017.


Joel H. Holt

Gregory Hodges

From: Joel Holt <holtvi@aol.com>
Sent: Wednesday, July 26, 2017 4:15 PM
To: Gregory Hodges
Subject: Re: Law clerk

Ok-if you think of any, let me know

Joel H. Holt, Esq.
2132 Company Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709

-----Original Message-----

From: Gregory Hodges <Ghodges@dtflaw.com>
To: Joel Holt <holtvi@aol.com>
Sent: Wed, Jul 26, 2017 4:13 pm
Subject: RE: Law clerk

Joel,
Thanks for your response. Since I have no recent personal experience with screening measures, I am in no position to offer suggestions.

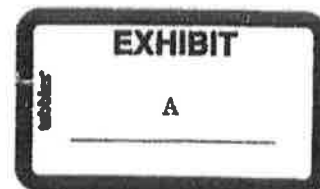
Gregory H. Hodges
Dudley, Topper and Feuerzeig, LLP
Law House, 1000 Frederiksberg Gade
St. Thomas, VI 00802
Direct: (340) 715-4405
Fax: (340) 715-4400
Web: www.DTFLaw.com

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From: Joel Holt [mailto:holtvi@aol.com]
Sent: Wednesday, July 26, 2017 2:26 PM
To: Gregory Hodges <Ghodges@dtflaw.com>
Subject: Re: Law clerk



Greg-I cleared all of this with you first, as you know. I then called Judge Brady's chambers, either on the same day we spoke or the day after you confirmed you had no problem with my speaking with his law clerk. His secretary, Ms. Krind, asked why I was calling, which I told her. She put me on hold and then came back and said Judge Brady had no objection to my talking to her. I then asked Ms. Krind to let the clerk know I would be calling, which she did. In short, I have never spoken directly with Judge Brady about her, nor anyone else at the Court other than the brief call with Ms. Krind.

I then spoke with the law clerk several times in June. I do not know which of my pending cases she has worked on, as we did not discuss any pending cases, but she assured me during our first call that she would immediately stop all work on any such files (I do have more than one case before Judge Brady). I told her in late June that I planned on extending an offer to her and sent her a written offer on June 30, which she accepted. The final contract was signed July 9th.

As for the "screening measures" going forward, that process is still being developed, but will include blocking her access to the office files, making sure she has no contact with the clients and having her only use the office gmail account, while I will continue to only use my AOL account for this case, which she will not have access to, so she will have no access to my emails (past or future). I welcome any other suggestions you might have.

Joel H. Holt, Esq.
2132 Company Street
Christiansted, St. Croix
U.S. Virgin Islands 00820
(340) 773-8709

-----Original Message-----

From: Gregory Hodges <Ghodges@dtflaw.com>
To: Joel Holt <holtvi@aol.com>
Sent: Wed, Jul 26, 2017 11:48 am
Subject: RE: Law clerk

Would you please let me know when you offered her a job, when she accepted, whether Judge Brady was advised of these events and, if so, when? Also, please advise what screening measures will be implemented.

Gregory H. Hodges
Dudley, Topper and Feuerzeig, LLP
Law House, 1000 Frederiksberg Gade
St. Thomas, VI 00802
Direct: (340) 715-4405
Fax: (340) 715-4400
Web: www.DTFLaw.com

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-----Original Message-----

From: Joel Holt [mailto:holtvi@aol.com]
Sent: Tuesday, July 25, 2017 8:16 PM
To: Gregory Hodges <Ghodges@dtflaw.com>
Subject: Re: Law clerk

Yes-she starts Oct 4

Joel H. Holt
2132 Company Street
Christiansted, USVI 00820
340-773-8709

> On Jul 25, 2017, at 7:32 PM, Gregory Hodges <Ghodges@dtflaw.com> wrote:

>

> Anything develop from this?

>

>

> Gregory H. Hodges
> Dudley, Topper and Feuerzeig, LLP
> Law House, 1000 Frederiksberg Gade
> St. Thomas, VI 00802
> Direct: (340) 715-4405
> Fax: (340) 715-4400
> Web: www.DTFLaw.com

>

>

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>

>

>

> -----Original Message-----

> From: Joel Holt [mailto:holtvi@aol.com]
> Sent: Monday, June 05, 2017 3:57 PM
> To: Gregory Hodges <Ghodges@dtflaw.com>
> Subject: Re: Law clerk

>

> Sure-thx

>

> Joel H. Holt
> 2132 Company Street
> Christiansted, USVI 00820
> 340-773-8709

>

>> On Jun 5, 2017, at 3:54 PM, Gregory Hodges <Ghodges@dtflaw.com> wrote:

>>

>> Will do. Instead of today, may I call you tomorrow afternoon?

>>

>>

>> Gregory H. Hodges
>> Dudley, Topper and Feuerzeig, LLP
>> Law House, 1000 Frederiksberg Gade
>> St. Thomas, VI 00802
>> Direct: (340) 715-4405
>> Fax: (340) 715-4400

>> Web: www.DTFLaw.com

>>

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>>

>>

>>

>> -----Original Message-----

>> From: Joel Holt [<mailto:holtvi@aol.com>]

>> Sent: Monday, June 05, 2017 3:19 PM

>> To: Gregory Hodges <Ghodges@dtflaw.com>

>> Subject: Law clerk

>>

>> I did get the full name of Judge Brady's law clerk-Robln Sealey, although I did not learn anything else about her. Once you have a response to my call last week, let me know. Thx

>>

>> Joel H. Holt

>> 2132 Company Street

>> Christiansted, USVI 00820

>> 340-773-8709

>

JOEL H. HOLT, ESQ. P.C.

2132 Company Street, Suite 2
Christiansted, St. Croix
U.S. Virgin Islands 00820

Tele. (340) 773-8709
Fax (340) 773-8677
E-mail: holtvi@jhl.com

October 27, 2017

Gregory H. Hodges
Stefan Herpel
Charlotte Perrell
Law House, 10000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00802

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

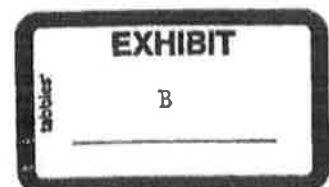
Re: Plaza Extra Matters

Dear Counsel:

As I discussed with Greg last June, I have hired Robin Sella, Judge Brady's former law clerk, who is scheduled to finally start next week.

I am setting up a "Chinese Wall" between her and every Hamed/Yusuf case, no matter what the designation may be (Plessen, Sixteen Plus, Manal Yousef, etc.). In this regard, my plan is as follows:

- Before she starts work, I will educate my office on what this entails to ensure full compliance;
- We have already taken steps to secure the current files in locked cabinets so that Robin cannot access them;
- I am setting up a separate email for those cases (holtvi.plaza@gmail.com) that I will start using on Monday, October 30th, which she will not have access to. In that case, we need to communicate through that email on the Hamed/Yusuf cases going forward, which I will inform other counsel as well as the Court to use;
- I have also taken steps to block off and password protect the portion of the office server regarding all of these cases so she cannot access anything on it.



Plaza /Sella Letter
Page 2

- To the extent we still exchange paper documents, my staff will be instructed to put all such correspondence and pleadings directly on my desk so I can then make sure they are securely filed;
- Once Robin starts, she will be instructed not to discuss these cases with anyone in my office, including me, or with anyone outside of the office, including other counsel in that case as well as anyone at the Court.

Please let me know if you have any other suggestions for me to implement, as I am glad to consider any input you want to provide to me. Thanks.

Cofdlally,


Joel H. Holt
JHH/jf

cc: Hon. Edgar Ross

EXHIBIT 2

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

SIXTEEN PLUS CORPORATION,)

Plaintiff,)

v.)

MANAL MOHAMMAD YOUSEF,)

Defendant.)

Civil No. **SX-16-CV-65**
ACTION FOR
DECLARATORY JUDGMENT

DECLARATION OF JOEL H. HOLT

I, Joel H. Holt, declare, pursuant to V.I. R. CIV. P. 84, as follows:

1. I am counsel of record for Sixteen Plus, Inc. and am familiar with the facts set forth herein.
2. Attached hereto are emails sent by opposing counsel to my AOL and general Gmail email accounts, even though they were requested to use a special Gmail account set up for this case.
3. However, I anticipated such mistakes, by opposing counsel or myself, and have made sure Robin Seila does not have the passwords to access either of these accounts (as if she would even do so).

I declare under penalty of perjury that the foregoing is true and correct, executed on this 15th day of January, 2018.

Dated: January 15, 2018



JOEL H. HOLT



[Handwritten signature]
AOL

From: Gregory Hodges <Ghodges@dtflaw.com>
To: 'Carl@hartmann.attorney' <Carl@hartmann.attorney>; Joel Holt <holtvi@aol.com>
Cc: Kim Japinga <kim@japinga.com>; Stefan Herpel <sherpel@dtflaw.com>; Charlotte Perrell <Cperrell@dtflaw.com>
Subject: RE: hamed response 17M9855-Draft Discovery Plan With CJH Proposed Edits 1.12.18
Date: Fri, Jan 12, 2018 3:45 pm
Attachments: 17N0307-Joint Discovery and Scheduling Plan.PDF (378K)

In light of your commitment below. I have signed the JDSP attached as a PDF to your email from 2:47 p.m. today. I note that there are some formatting and numbering issues starting at paragraph "8" on page 4, but I have signed anyway. You will need to correct the date on the COS. Please have Joel sign and file the fully executed version with Case Anywhere today. Thanks.

Gregory H. Hodges
Dudley, Topper and Feuerzeig, LLP
Law House, 1000 Frederiksberg Gade
St. Thomas, VI 00802
Direct: (340) 715-4405
Fax: (340) 715-4400
Web: www.DTFLaw.com

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From: Carl Hartmann [mailto:carl@carlhartmann.com]
Sent: Friday, January 12, 2018 3:14 PM
To: Gregory Hodges <Ghodges@dtflaw.com>; Joel Holt <holtvi@aol.com>
Cc: Kim Japinga <kim@japinga.com>
Subject: RE: hamed response 17M9855-Draft Discovery Plan With CJH Proposed Edits 1.12.18

[Handwritten signature]
AOL

Yes...I will do that table. It will show, for each new numbered claim H-41 to H-141 the old claim as it was described in detail in our filing – and I will include the prior documents submitted re that claim.

Carl



Joel Holt <joelholtpc@gmail.com>

Hamed v. Yusuf, et al.

gmail

Michele Barber <Mbarber@dtflaw.com> Wed, Dec 6, 2017 at 3:36 PM
 To: "Joel H. Holt (joelholtpc@gmail.com)" <joelholtpc@gmail.com>, Carl Hartmann <carl@carlhartmann.com>, "Mark Eckard (mark@markeckard.com)" <mark@markeckard.com>, "Jeffrey B. C. Moorhead (jeffreymlaw@yahoo.com)" <jeffreymlaw@yahoo.com>, "Edgar D. Ross (edgarrossjudge@hotmail.com)" <edgarrossjudge@hotmail.com>
 Cc: Gregory Hodges <Ghodges@dtflaw.com>

Good afternoon,

Attached is a Motion to Disqualify and a Notice of Filing Documents In the Other Division.

Michele Barber

Assistant to Gregory H. Hodges, Esq.,

Justin K. Holcombe, Esq., and Lisa Michelle Kömives, Esq.

Dudley, Topper and Feuerzeig, LLP

1000 Frederiksberg Gade

St. Thomas, VI 00802

Direct Dial: (340) 715-4449

Fax: (340) 715-4400

Email: mbarber@dtflaw.com

Website: www.dtflaw.com

2 attachments

EXHIBIT 3

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

MANAL MOHAMMAD YOUSEF a/k/a
MANAL MOHAMAD YOUSEF,

Plaintiff,

v.

SIXTEEN PLUS CORPORATION,

Defendant.

SIXTEEN PLUS CORPORATION,

Counterclaim Plaintiff,

v.

MANAL MOHAMMAD YOUSEF a/k/a
MANAL MOHAMAD YOUSEF and
FATHI YUSUF,

Counterclaim Defendants.

CIVIL NO. SX-17-CV-342

**ACTION FOR DEBT AND
FORECLOSURE**

**COUNTERCLAIM FOR
DAMAGES**

JURY TRIAL DEMANDED

REPLY TO PLAINTIFF'S MOTON TO STAY

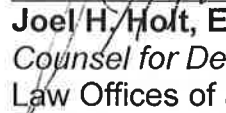
In her reply to the disqualification motion, the Plaintiff improperly added a new motion to stay these proceedings pending certain requested discovery on the disqualification. The request to stay a ruling pending certain requested discovery on the disqualification motion is without merit. The clarity of the law on the disqualification issue makes it clear that no such discovery is motion is needed.¹

¹ Such discovery, if ordered, would involve deposing all counsel and their clients, not just counsel for the Defendant and his new associate, Robin Seila, as the issue of waiver would also have to be explored if this Court does not think the motion can be



An identical reply has been filed in the companion case, SX-16-CV-65, where a stay was also sought. See **Exhibit 3**.

Dated: January 16, 2017



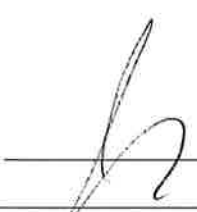
Joel H. Holt, Esq. (Bar # 6)
Counsel for Defendant
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
Email: holtvi@aol.com
T: (340) 773-8709/ F (340) 773-8677

CERTIFICATE OF SERVICE

This document complies with the page or word limitation set forth in Rule 6-1 (e). I hereby certify that on this 16th day of January, 2018, I served a copy of the foregoing by hand delivery and email, as agreed by the parties,

James Hymes VI
Bar No. 264
Counsel for Manal Yousef
P.O. Box 990
St. Thomas, Virgin Islands 00804-0990
jjm@hymeslawvi.com
rauna@hymeslawvi.com

Gregory H. Hodges
Stefan Herpel
Lisa Komives
Counsel for Fathi Yusuf
Law House, 10000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00802
ghodges@dtflaw.com



resolved without discovery, as Fathi Yusuf (who controls Manal Yousef) *waived* any such objection to disqualification through his counsel. See **Exhibit 1**. Indeed, several counsel have inadvertently used one of Holt's other email accounts, including himself, as well as opposing counsel who tried to breach the "Chinese Wall" themselves by sending emails to Holt's AOL account and Office Gmail account, rather than the account set up for these filings See **Exhibit 2**. However, such "mistakes" were anticipated, so counsel made sure these "mistakes" did not affect this "wall", **as he has made sure Seila does not have access to either of these email accounts by not sharing his passwords with her.**