

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

**HISHAM HAMED, individually,
and derivatively for
SIXTEEN PLUS CORPORATION,**

Plaintiffs/Counterclaim Defendant,

v.

MANAL MOHAMMAD YOUSEF,

Defendant/Counterclaim Plaintiff.

CIVIL NO. SX-16-CV-00065

**ACTION FOR
DECLARATORY JUDGMENT
CICO and FIDUCIARY DUTY**

JURY TRIAL DEMANDED

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

v.

SIXTEEN PLUS CORPORATION,

Defendant.

CIVIL NO. SX-17-CV- 00342

**ACTION FOR DEBT AND
FORECLOSURE**

**COUNTERCLAIM FOR
DAMAGES**

JURY TRIAL DEMANDED

SIXTEEN PLUS CORPORATION,

Counterclaim Plaintiff,

v.

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

Counterclaim Defendants, and

FATHI YUSUF,

Third Party Defendant.

**SECOND REQUESTS TO ADMIT
MANAL YOUSEF**

COMES NOW Carl J. Hartmann, co-counsel for Sixteen Plus, and propounds the following requests to admit on Manal Yousef. They are numbered consecutively following the first set.

Request to Admit 14

Admit or Deny that you understand that Fathi Yusuf has refused to answer discovery unrelated to the facts surrounding the Note and Mortgage at issue here on the basis of the 5th Amendment to the U.S. Constitution.

Request to Admit 15

Admit or Deny that you understand that his refusal to answer discovery on the basis of the 5th Amendment is because he is asserting his right against self-incrimination in an existing or potential criminal matter.

Request to Admit 16

Admit or Deny that you have been informed that you are or may be a person of interest, a target, or indicted in a pending or potential criminal matter.

Request to Admit 17

Admit or Deny that you either believe or fear that you are or may be a person of interest, a target, or indicted in a pending or potential criminal matter.

Request to Admit 18

Admit or Deny that you have, at some point in your life, been within the physical premises of the United States; which shall include its mainland, territories, possessions, the commonwealth of Puerto Rico or physical premises in foreign lands such as embassies, military bases or special use zones.

Request to Admit 19

Admit or Deny that, at the time you are answering this request, you are willing to physically attend a trial in this matter in the USVI.

Request to Admit 20

Admit or Deny that you are, at the time you are answering this request, physically able to physically attend a trial in this matter in the USVI.

Request to Admit 21

Admit or Deny that you are willing to apply for a Visa to attend a trial in this matter in the USVI.

Request to Admit 22

Admit or Deny that at the time you are answering this request if you had the appropriate visa, you are not prevented from physically attending a trial in this matter in the USVI by any legal or other type of impediment.

Request to Admit 23

Admit or Deny that you personally have not filed or paid any USVI taxes relating to any interest payments you have received from Sixteen Plus.

Request to Admit 24

Admit or Deny that you personally have not filed or paid any USVI income taxes relating to any interest payments you have received from Sixteen Plus.

Request to Admit 25

Admit or Deny that you personally have not ever filed or paid any USVI income
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taxes relating to USVI source income.

Request to Admit 26

Admit or Deny that neither Isam nor Jamil have filed or paid any USVI income taxes for you relating to USVI source income.

Request to Admit 27

Admit or Deny that neither Isam or Jamil have ever filed or paid, for you, any USVI income taxes on interest payments from Sixteen Plus to you.

Dated: September 14, 2022



Carl J. Hartmann III, Esq.
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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 9/14/2022, I served a copy of the foregoing by email, as agreed by the parties, as well as a copy mailed to James Hymes at the address below, on:

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/s/ Carl J. Hartmann III