

same hereby respond to Plaintiff Hashim Hamed's Second Request For The Production Of Documents, as follows:

GENERAL OBJECTIONS

Isam Yousuf and Jamil Yousuf submit and incorporate into each request the following general objections to Plaintiff's Second Request for the Production of Documents set forth herein, and further, by submitting their responses to the Plaintiff's Request for Admissions, do 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. Isam Yousuf and Jamil Yousuf object to each request contained in Plaintiff's Second Request for the Production of Documents to the extent such request asks for communications between them and their lawyers; these attorney-client communications are privileged and not subject to disclosure.

2. Isam Yousuf and Jamil Yousuf object to each request contained in Plaintiff's Second Request for the Production of Documents to the extent such request asks for disclosure of material prepared by or for their lawyers or their 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, Isam Yousuf and Jamil Yousuf object to each request contained in Plaintiff's Second Request for the Production of Documents to the extent such request asks for communications between them and their lawyers on the grounds of the privilege afforded to parties with a common interest or joint defense.

3. Isam Yousuf and Jamil Yousuf have 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 their ongoing investigation in defense of this action warrant such changes.

4. Isam Yousuf and Jamil Yousuf generally object 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 Rules 26 and 34 of the V.I. Rules of Civil Procedure. Furthermore, objection is made to each and every request that is uncertain as to time and purports to request documents pertaining to facts or circumstances unrelated in time to any issue or claim in this action.

REQUESTS

Document Request No. 15:

All documents from you or any business owned or operated by you, including but not limited to Island Appliances f/k/a Canigater Street, Dutch St. Maarten, regarding the deposit of any amount in excess of \$100,000 (equivalent) from 1995 through 1999.

Isam's Response:

None.

Jamil's Response:

In 1995, Jamil Yousuf was 11 years old and was living in Jordan. As a consequence of this he had no involvement, knowledge or understanding of Island Appliances, or of any aspect of the subject matter which forms the basis for this request for production of documents.

Document Request No. 16:

All documents from you or any business owned or operated by you, including but not limited to Island Appliances f//a Canigater Street, Dutch St. Maarten, regarding the withdrawal of any amount in excess of \$100,000 (equivalent) from 1995 through 1999.

Isam's Response:

None.

Jamil's Response:

In 1995 Jamil Yousuf was 11 years old and was living in Jordan. As a consequence of this he had no involvement, knowledge or understanding of island appliances or any aspect of the subject matter which forms the factual basis this request for production of documents

Document Request No. 17:

All documents from you or any business owned or operated by you, including but not limited to Island Appliances f//a Canigater Street, Dutch St. Maarten, regarding the wiring or other transmission to the US Virgin Islands, of any amount in excess of \$100,000 (equivalent) from 1995 through 1999.

Isam's Response:

Attached is a copy of a Transfer Order dated February 13, 1997, to the Sixteen Plus Corporation, in the amount of \$2 Million.

Attached is a copy of a Bank of Nova Scotia telex transfer document dated September 4, 1997, to the Sixteen Plus Corporation in the amount of \$2 Million.

Jamil's Response:

In 1995, Jamil Yousuf was 11 years old and was living in Jordan. He had no involvement, knowledge, or understanding of Island Appliances, or any aspect of the factual basis for this request for production of documents.

Document Request No. 18:

All documents from you or any business owned or operated by you, including but not limited to Island Appliances f//a Canigater Street, Dutch St. Maarten, regarding the

gifting or conveyance to Manal Yousef any amount in excess of \$100,000 (equivalent) at any time.

Isam's Response:

None.

Jamil's Response:

in 1995, Jamil Yousuf was 11 years old and was living in Jordan. He had no involvement with, knowledge or understanding of the operation or financial aspects of Island Appliances, or the gifting or conveyance to Manal Yousef of any sums of money. In the 1990s, his knowledge of the facts and circumstances of this case had risen following his appointment by Manal Yousef as her Attorney in Fact pursuant to a General Power of Attorney dated July 22, 2012. He is aware that the Sixteen Plus Corporation issued a Promissory Note and First Priority Mortgage to Manal Yousef to secure repayment to her of the sum of \$4,500,000, plus interest, which she loaned to Sixteen Plus Corporation for it to purchase certain real property in St. Croix, commonly known as Diamond Katurah.

Respectfully Submitted,

DATED: September 22, 2022.

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

Counsel for Defendants –

Isam Yousuf, and Jamil Yousuf

By: */s/ James L. Hymes, III*

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CERTIFICATE OF SERVICE

I hereby certify that on this the 22nd day of September, 2022, I caused an exact copy of the foregoing ***“Responses of Isam Yousuf and Jamil Yousuf To Plaintiff Hisham Hamed's Second Request For The Production Of Documents Propounded To Defendants Jamil and Isam Yousef (aka Yousuf)”*** to be served electronically by e-mail, to the following counsel of record:

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/s/ Rauna Stevenson-Otto



Banque Française Commerciale

Antilles Guyane

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ORDRE DE VIREMENT / TRANSFER ORDER

DOMAINEUR D'ORDRE
ISSUER

Nom / Name: ISAMI Kousuf

Prelevement sur mon compte numero / From my account number: 006063544

Date: 2/3/77

Montant / Amount: \$ 2,000,000. -
 (en chiffres) / (in figures) Two million dollar

BENEFICIAIRE
BENEFICIARY

Nom / Name: Sinben plus Corporation

Adresse / Address: St. Thomas U.I. V
TEL 809-775-5646

Compte numero / Account number: 058-00039411

BANQUE / BANK: The Bank of Nova Scotia

Adresse / Address: Sunny Isle Branch, P.O. Box 775 Christians
St. Croix U.S.V.I 00821-1775

Code établissement / Code: ABA Routing # 021606069

dans le cas où il s'agit de VIREMENTS PERMANENTS, veuillez préciser: PERMANENT TRANSFERS

A compte de / From:

Tous les / Every: 2-4 P

Nombre de virements à effectuer / Quorum: 2-4 P

Signature du donneur d'ordre / Order's signature: [Signature]

Indien / Included:

HAMD227018

295-1609

1030118 (1/79) CREDIT VOUCHER

Scotiabank THE BANK OF NOVA SCOTIA	<i>Summy Lake</i>	DATE 9/4/97	AMOUNT CREDITED 2,000.00	AMOUNT CREDITED 2,000.00
BRANCH			DATE	
ACCOUNT NUMBER	ACCOUNT NUMBER	ACCOUNT NUMBER	POWER EXCHANGE	
TRANSIT NUMBER 8058 5	ACCOUNT NUMBER 39411	ACCOUNT NUMBER	TELETYPE	
CREDIT	CUSTOMER'S NAME SIXEEN PLUS CORP	ACCOUNT NUMBER	COMMISSION	

*for SIXEEN PLUS CORP.
P.O. Box 763
Box 111111
11111*

PREPARED BY *[Signature]* **CHECKED BY** *[Signature]* **AUTHORIZED BY** *[Signature]*

PARTICULARS
*To Taxes Transfer
Proceeds of App Valuation
to Valuation Agency*