

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

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

and
SIXTEEN PLUS CORPORATION,
Counter-Plaintiff,
v.
MANAL MOHAMMAD YOUSEF,
Counter-Defendant,

and
SIXTEEN PLUS CORPORATION,
Third-Party Plaintiff,
v.
FATHI YUSUF,
Third-Party Defendant.

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

and
MANAL MOHAMMAD YOUSEF,
Counter-Plaintiff,
v.
SIXTEEN PLUS CORPORATION,
Counter-Defendant.

CIVIL NO.: SX-2017-CV-00342

**ACTION FOR DEBT AND
FORECLOSURE**

**COUNTERCLAIM FOR
DAMAGES**

THIRD PARTY ACTION

JURY TRIAL DEMANDED

Consolidated With

CIVIL NO. SX-2016-CV-00065

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

COUNTERCLAIM

JURY TRIAL DEMANDED

**JOINT MOTION FOR ENLARGEMENT
OF THE SCHEDULING ORDER OF JANUARY 20, 2023**

COME NOW all of the parties, and jointly move the Court for an enlargement of its Scheduling Order of January 20, 2023. Counsel for the parties have agreed to

this enlargement after mutual discussion, and to have this motion filed by the undersigned. A proposed order identical to the Court's except for dates is attached.

The revised dates have been calculated by adding approximately **six (6) months** to all dates in the January 20, 2023 scheduling order, with the exception of the conference with the Court set by Zoom—which has been left blank.

A simultaneous mirror motion is being filed in the 650 action.

Dated: February 14, 2023

Counsel for Sixteen Plus



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CERTIFICATE OF SERVICE

I hereby certify that, discounting captions, headings, signatures, quotations from authority and recitation of the opposing party's own text, this document complies with the page and word limitations set forth in Rule 6-1(e) and that on **February 14, 2023**, I served a copy of the foregoing by email and the Court's E-File system, as agreed by the parties, to:

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Courtesy copy to Kevin Rames, Esq.

/s/ Carl J. Hartmann III

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

SIXTEEN PLUS CORPORATION,)	
)	SX-2016-CV-00065
Plaintiff/Counter-Defendant,)	
)	ACTION FOR DECLARATORY
v.)	JUDGMENT
)	
MANAL MOHAMMAD YOUSEF,)	(JURY)
)	
Defendant/Counterclaimant.)	
)	
MANAL MOHAMMAD YOUSEF,)	SX-2017-CV-00342
a/k/a MANAL MOHAMAD YOUSEF,)	
)	ACTION FOR DEBT AND
Plaintiff/Counter-Defendant,)	FORECLOSURE OF REAL
)	PROPERTY MORTGAGE
v.	}	
	}	
SIXTEEN PLUS CORPORATION,)	(CONSOLIDATED)
)	
<u>Defendant/Counterclaimant.</u>)	

ORDER

THIS CONSOLIDATED matter is before the Court on the Parties' *Joint Motion for Enlargement of the Scheduling Order of January 20, 2023*, filed February 14, 2023. The Court being advised in the premises, it is hereby

ORDERED that the discovery plan as set forth in the Parties' Third Amended Planning Meeting Report is APPROVED; it is further

ORDERED that the parties shall adhere to the following deadlines in this matter:

1. Pre-Discovery Disclosures:

The parties will continue to exchange the information required by V.I. R. Civ. P. 26(a)(1).

2. Discovery Plan:

The parties jointly propose to the court the following discovery plan: Discovery will be needed on the following subjects:

- factual bases of the allegations stated in the complaint;
- the extent of the damages claimed by the plaintiff; and
- the defenses asserted by the defendants.

A. Written discovery:

All written discovery was propounded by **September 15, 2022**.

B. Fact witness depositions:

All fact witness depositions shall be completed by **September 30, 2023**.

Maximum number of depositions as provided by V.I. R. Civ. P. 30 (a)(2)(A). It is anticipated that plaintiff and defendants may need to exceed 10 depositions each and they will reasonably cooperate in scheduling same.

Duration of depositions as provided by V.I. R. Civ. P. 30(d)(1).

C. Expert discovery

Reports from retained experts under Rule 26(a)(2) due:

- from plaintiff by **November 24, 2023**;
- from defendants by **February 15, 2024**.

Expert witness depositions shall be completed by **February 28, 2024**.

3. Other Items:

Mediation shall be completed by **June 30, 2023**.

Status Conference shall take place on _____, **2023** at _____, via Zoom.

All Dispositive Motions shall be filed by **May 28, 2024**.

Settlement can be evaluated at any time during the pendency of the action.

Final lists of witnesses and exhibits shall be provided as directed by the Court.

Jury selection and trial shall be set at the Status Conference.

Dated: _____, **2023**

DOUGLAS A. BRADY, JUDGE

ATTEST:
TAMARA CHARLES
Clerk of Court

By: _____
Court Clerk Supervisor