

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

HISHAM HAMED, individually,
and derivatively on behalf of
SIXTEEN PLUS CORPORATION,

Plaintiff,

v.

FATHI YUSUF, ISAM YOUSUF and
JAMIL YOUSUF,

Defendants,

and

SIXTEEN PLUS CORPORATION,

a nominal Defendant.

Case No.: SX-2016-CV-00650

**DERIVATIVE SHAREHOLDER
SUIT, ACTION FOR DAMAGES
AND CICO RELIEF**

JURY TRIAL DEMANDED

**JOINT MOTION PURSUANT TO RULE 5.2(d)
(FOR THE SEALING OF PASSPORTS)**

COME NOW Defendants Jamil Yousuf, Isam Yousuf, and Plaintiff Hisham Hamed, though undersigned counsel, and move the Court, pursuant to V.I.R,Civ.P. 5.2(d) be allowed to file copies of the passports of Jamil Yousuf, Isam Yousuf and Manal Yousef under seal.

1. Plaintiff Hamed filed discovery requests for the production of the described passports here and in the companion 65/342 action.
2. The parties have agreed that prior to production they will be subject to the agreement of counsel here not to reveal these records without a further court order—and that they should, therefore, be sealed under Rule 79-1
3. Rule 5.2(d) provides:

(d) Filings Made Under Seal. The court may order that a filing be made under seal without redaction. The court may later unseal the filing or order the person who made the filing to file a redacted version for the public record.

4. The documents contain personal and identifying information including the passport numbers, travel and other details of the passport holders.
5. Counsel for Defendants Jamil Yousuf and Isam Yousuf has given permission for Hamed's counsel to submit this joint motion

A proposed Order is attached as **Exhibit 1**.

Dated: March 17, 2023

Counsel for Hisham Hamed



Carl J. Hartmann III, Esq. (Bar #48)
Co-Counsel for Hisham Hamed
2940 Brookwind Dr,
Holland, MI 49424
Telephone: (340) 642-4422
Email: carl@carlhartmann.com

Joel H. Holt, Esq. (Bar # 6)
Counsel for Hisham Hamed
LAW OFFICES OF JOEL H. HOLT
2132 Company Street,
Christiansted, VI 00820
Email: holtvi@aol.com
Phone: (340) 773-8709/
Fax: (340) 773-8677

**Counsel for Defendants Isam and
Jamil Yousuf**

James Hymes III, Esq.
*Counsel for Defendants Isam and
Jamil Yousuf and for Manal Yousef*
LAW OFFICES OF JAMES L.
HYMES, III, P.C.
P.O. Box 990
St. Thomas, VI 00804-0990
Tel: (340) 776-3470
Fax: (340) 775-3300

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 **March 17, 2023**, I served a copy of the foregoing by email and the Court's E-File system, as agreed by the parties, to:

Charlotte K. Perrell, Esq.
Stefan B. Herpel, Esq.
Counsel for Defendant Fathi Yusuf
DUDLEY NEWMAN
FEUERZEIG LLP
Law House
1000 Frederiksberg Gade
P.O. Box 756
St. Thomas, VI 00804-0756
Tel: (340) 774-4422
cperrell@dnfvi.com,
sherpel@dnfvi.com

Kevin A. Rames, Esq.
Counsel for Nominal Defendant
Sixteen Plus Corporation
2111 Company Street, Suite 3
Christiansted, VI 00820
Phone: (340) 773-7284
Fax: (340) 773 -7282
kevin.rames@rameslaw.com

/s/ Carl J. Hartmann

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

EXHIBIT

1

HISHAM HAMED, individually,
and derivatively on behalf of
SIXTEEN PLUS CORPORATION,

Plaintiff,

v.

FATHI YUSUF, ISAM YOUSUF and
JAMIL YOUSUF,

Defendants,

and

SIXTEEN PLUS CORPORATION,

a nominal Defendant.

Case No.: **SX-2016-CV-00650**

**DERIVATIVE SHAREHOLDER
SUIT, ACTION FOR DAMAGES
AND CICO RELIEF**

JURY TRIAL DEMANDED

ORDER

THIS MATTER having come on before the Court on the joint motion of Defendants Jamil Yousuf, Isam Yousuf, and Plaintiff Hisham Hamed, pursuant to V.I.R,Civ.P. 5.2(d) – seeking to be allowed to file copies of the passports of Jamil Yousuf, Isam Yousuf and Manal Yousef under seal, and the Court being informed in the premises:

IT IS HEREBY ORDERED, that copies of those passports will be filed under seal with the Clerk of the Court pursuant to the Rule.

It is **SO ORDERED**.

Dated: _____, 2023

ATTEST: TAMARA CHARLES,
Clerk of the Court

Douglas A. Brady
Judge of the Superior Court

By: Court Clerk Supervisor