

**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.

SIXTEEN PLUS CORPORATION,
Plaintiff,

v.

MANAL MOHAMMAD YOUSEF,
Defendant,

and

MANAL MOHAMMAD YOUSEF,
Counter-Plaintiff,

v.

SIXTEEN PLUS CORPORATION,
Counter-Defendant.

MANAL MOHAMMAD YOUSEF,
Plaintiff,

v.

SIXTEEN PLUS CORPORATION,
Defendant,

and

SIXTEEN PLUS CORPORATION,
Counter-Plaintiff,

v.

MANAL MOHAMMAD YOUSEF,
Counter-Defendant.

Case No.: SX-2016-CV-00650

DERIVATIVE SHAREHOLDER
SUIT, ACTION FOR DAMAGES
AND CICO RELIEF

JURY TRIAL DEMANDED

CONSOLIDATED WITH

CIVIL NO. SX-2016-CV-00065

ACTION FOR
DECLARATORY JUDGMENT,
CICO and FIDUCIARY DUTY

COUNTERCLAIM

JURY TRIAL DEMANDED

CONSOLIDATED WITH

CIVIL NO.: SX-2017-CV-00342

ACTION FOR DEBT AND
FORECLOSURE

COUNTERCLAIM FOR
DAMAGES

JURY TRIAL DEMANDED

**FOURTH NOTICE OF VIDEOTAPED DEPOSITION
OF PLAINTIFF MANAL MOHAMMAD YOUSEF**

PLEASE TAKE NOTICE the undersigned will take the videotaped deposition of
the following:

NAME: MANAL MOHAMMAD YOUSEF

DATE & TIME: FRIDAY, JULY 28, 2022 at 10:00 AM. AST

PLACE: Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
Email: holtvi@aol.com
Phone: (340) 773-8709
Fax: (340) 773-8677

The deposition will be conducted utilizing video recording. In addition, video teleconferencing (VTC) services will be provided for remote access for those COUNSEL wishing to participate in the deposition via the internet and/or telephone. Please contact the noticing attorney at least seven (7) calendar days prior to the deposition to advise that it is your desire to appear via this remote participating means so that the necessary credentials, call-in numbers, testing and information, if necessary, can be provided to you prior to the proceedings.

This deposition is being taken for use as evidence and/ or trial purposes, and/ or any other purpose allowed by the governing rules, and may continue from day to day until completed. As stated, the deposition shall be recorded by videography and stenography.

**Counsel for Hisham Hamed
and Sixteen Plus Corporation**

Dated: May 15 , 2023

A handwritten signature in black ink, appearing to read "Carl J. Hartmann III", written over a horizontal line.

Carl J. Hartmann III, Esq. (Bar #48)
Co-Counsel for Hisham Hamed
Co-Counsel for Sixteen Plus Corp.
2940 Brookwind Dr,
Holland, MI 49424
Telephone: (340) 642-4422
Fax: (616) 345-3818
Email: carl@carlhartmann.com

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

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 **May 15 , 2023**, I served a copy of the foregoing by email and the Court's E-File system, as agreed by the parties, to:

James Hymes III, Esq.

*Counsel for Defendants Isam and Jamil Yousuf
Counsel for Plaintiff/Defendant 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

jim@hymeslawvi.com

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

K.A. RAMES, P.C.

2111 Company Street, Suite 3

Christiansted, VI 00820

Phone: (340) 773-7284

Fax: (340) 773 -7282

kevin.rames@rameslaw.com

/s/ Carl J. Hartmann