

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

**HISHAM HAMED, on behalf of himself  
and derivatively, on behalf of SIXTEEN  
PLUS CORPORATION,**

*Plaintiffs,*

**v.**

**FATHI YUSUF, ISAM YOUSUF,  
JAMIL YOUSUF, and  
MANAL MOHAMMAD YOUSEF,**

*Defendants,*

and

**SIXTEEN PLUS CORPORATION,**

*a nominal defendant.*

**Case No.: 2016-SX-CV-650**

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

**JURY TRIAL DEMANDED**

**CONSOLIDATED CASES: Civil Case No. SX-2016-CV-650; Civil Case No. SX-2016-CV 00065; Civil Case No. SX-2017-CV-342**

**STIPULATION**

Counsel for Plaintiff Hisham Hamed (Carl Joseph Hartmann) and Counsel for Isam and Jamil Yousuf (Christopher Allen Kroblin) do hereby agree and stipulate, and ask the Special Master to SO ORDER the following.

With regard to the Special Master's Order of June 14, 2024, the parties agree and stipulate with regard to the Jamil and Isam Yousuf Requests to Admit to Hamed:

1. The responses to the 123 Requests for Admission dated September 15, 2022 ("RFA") are deemed timely served by Hamed on October 26, 2022.

2. The Defendants are relieved from filing of the 123 RFA with the Court as ordered, as that is no longer necessary.

Counsel for Jamil and Isam Yousuf has allowed undersigned counsel to file this document by E-File and represent his agreement. In addition, prior counsel for Isam and Jamil Yousuf, James Hymes Esq., was provided a copy for his review/records.

Respectfully,

**Dated:** June 24, 2024

/s/ Carl J. Hartmann III  
**Carl J. Hartmann III, Esq.**  
*Co-Counsel for Plaintiff*  
2940 Brookwind Dr,  
Holland, MI 49424  
Email: carl@carlhartmann.com

Respectfully,

**Dated:** June 24, 2024

/s/ Christopher Allen Kroblin  
**CHRISTOPHER ALLEN KROBLIN, ESQ.**  
**MARJORIE WHALEN, ESQ.**  
V.I. Bar Nos. 966 and R2019  
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mwhalen@kellfer.com

## CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of June, 2024, I served a copy of the foregoing by the Court's E-File System and email, as agreed by the parties, on:

**Charlotte Perrell**  
**Stephen Herpel**  
*Counsel for Defendant Fathi Yusuf*

**Christopher Allen Kroblin**  
**Marjorie Whalen**  
*Counsel for Defendants*  
*Manal Mohammad Yousef*  
*Jamil Yousuf*  
*Isam Yousuf*  
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**Kevin Rames**  
Counsel for Nominal Defendant  
Sixteen Plus Corporation

/s/ Carl J. Hartmann III