# **IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS**

**DIVISION OF ST. CROIX**

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

**MOTION TO WITHDRAW AS COUNSEL (650)**

**BY CARL J. HARTMANN**

**TO BE EFFECTIVE OCTOBER 1, 2024**

 **COMES NOW**, co-counsel in this action, Carl J. Hartmann III, and moves this Court for an order, **effective October 1, 2024**, allowing him to withdraw as of that date, from the captioned action pursuant to Rule 6-5

Rule 6-5. Motions by Counsel for Leave to Withdraw No attorney may withdraw an appearance except with leave of court after notice to the attorney's client. All motions for withdrawal as counsel shall include a verified statement as to contact with or attempts to contact the client concerning such withdrawal, an indication of service upon or efforts to serve the client with the moving papers, and updated civil litigant data forms for each client, which forms shall include the client's last known address and telephone number.

Attached below is a verified statement by Movant, that counsel is in continuous contact with his client herein, and has specifically informed the client of his withdrawal, and served a copy of these moving papers—and the client’s agreement and permission.

 Five related Hamed v. Yusuf (or their subsidiaries) actions (SX-12-CV-370, SX-16-CV-429, SX-16-CV-650, SX-16-CV-65, SX-17-CV-342) are the only civil actions in which undersigned remains as counsel before any Court of the U.S. Virgin Islands, including the federal court.) Attached as **Exhibit A** is the undersigned’s receipt demonstrating payment of the $100 fee to the V.I. Bar Association and his Petition to the V.I. Supreme Court for a change of status to “Inactive” also effective October 1, 2024.

 Finally, attached hereto as **Exhibit B** is the updated civil litigant data form for the client.

**Dated**: July 8, 2024 /s/ Carl J. Hartmann III

**Carl J. Hartmann III, Esq.**

Co-Counsel for Plaintiff

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**Joel H. Holt, Esq.** (Bar # 6)

Counsel for Plaintiff

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Christiansted, Vl 00820

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**VERIFIED STATEMENT AS TO CLIENT COMMUNICATION**

I state and verify upon my oath that I am in continuous contact with my client herein, and have specifically informed the client of his withdrawal, and served a copy of these moving papers—and I have obtained, by email on July 8, 2024, the client’s agreement and permission.

**Dated**: July 8, 2024 /s/ Carl J. Hartmann III

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8th day of Julu 2024, I served a copy of the foregoing--by the Court’s E-File System and email, as agreed by the parties, on:

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**Charlotte Perrell**

**Stephen Herpel**

Counsel for Defendant Fathi Yusuf

**Christopher Allen Kroblin**

**Marjorie Whalen**

Counsel for Defendants

Manal Mohammad Yousef

Jamil Yousuf

Isam Yousuf

**Kevin Rames**

Counsel for Nominal Defendant

Sixteen Plus Corporation

/s/ Carl J. Hartmann III