

**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.

CIVIL NO.: SX-2017-CV-00342

**ACTION FOR DEBT AND
FORECLOSURE**

**COUNTERCLAIM FOR
DAMAGES**

THIRD PARTY ACTION

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

**MOTION TO WITHDRAW AS COUNSEL (342)
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 acting-president of the client of his withdrawal, and served a copy of these moving papers—and the his 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 for 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 9, 2024

/s/ Carl J. Hartmann III
Carl J. Hartmann III, Esq.
Co-Counsel for Defendant
Sixteen Plus Corporation
2940 Brookwind Dr,
Holland, MI 49424
Email: carl@carlhartmann.com
Phone: (616) 416-0956

Joel H. Holt, Esq. (Bar # 6)
Counsel for Defendant
Law Offices of Joel H. Holt
2132 Company Street,
Christiansted, VI 00820
Email: holtvi@aol.com
Phone: (340) 773-8709
Fax: (340) 773-8677

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 acting-president of the client of my 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 9th day of July 2024, I served a copy of the foregoing--by the Court's E-File System and email, as agreed by the parties, on:

i

Charlotte Perrell

Stephen Herpel

Counsel for Third-Party Defendant Fathi Yusuf

Christopher Allen Kroblin

Marjorie Whalen

Counsel for Plaintiff Manal Mohammad Tousef

/s/ Carl J. Hartmann III

Virgin Islands Bar Association

Exhibit A

Date	PO	Invoice #
7/5/2024		200004997

Bill To
Carl Hartmann Carl J. Hartmann, Attorney 2940 Brookwind Dr. Holland, MI 49424 United States

Ship To
Carl Hartmann Carl J. Hartmann, Attorney 2940 Brookwind Dr. Holland, MI 49424 United States

Terms	Due Date
Due on receipt	7/5/2024

Qty	Description	Price	Totals
1	Inactive Status	\$100.00	\$100.00
Sub-Total			\$100.00
Total			\$100.00

Payments/Adjustments

Qty	Description	Price	Totals
1	Payment via Credit Card (using card xxxxxxxxxxxx2732) <i>Applied to invoice on 7/5/2024 11:30:55 AM</i>	(\$100.00)	(\$100.00)
Total Payments/Adjustments			(\$100.00)
Balance Due			\$0.00

Additional Information:

Application will be made to the VI Supreme Court for this to be effective October 1, 2024

EXHIBIT B

Defendant(s) -- Page 1

CASE INFORMATION AND LITIGANT DATA FORM

CASE NO. _____

PARTY INFORMATION

DEFENDANT 1: (FULL NAME)

DEFENDANT 2: (FULL NAME)

ALIAS: _____

PLACE OF BIRTH: _____

PLACE OF BIRTH: _____

PLACE OF BIRTH: _____

DOB: ____/____/____
MONTH/DAY/YEAR

DOB: ____/____/____
MONTH/DAY/YEAR

MAILING ADDRESS: (Include zip code)

PHYSICAL ADDRESS:

PLACE OF EMPLOYMENT:

EMAIL ADDRESS:

HOME TELEPHONE: (____) _____

(____) _____

CELL NUMBER: (____) _____

(____) _____

WORK NO.: (____) _____

(____) _____

FAX NO.: (____) _____

(____) _____

DEFENSE ATTORNEY INFORMATION

CHECK HERE IF APPEARING PRO SE (ON YOUR OWN BEHALF, WITHOUT AN ATTORNEY)

ATTORNEY 1: (FULL NAME)

ATTORNEY 2: (FULL NAME)

MAILING ADDRESS: (Include zip code)

PHYSICAL OFFICE ADDRESS:

Check if Same as Mailing Address

Check if Same as Mailing Address

CASE INFORMATION AND LITIGANT DATA FORM

EMAIL ADDRESS:

HOME TELEPHONE: (____) _____

(____) _____

CELL NUMBER: (____) _____

(____) _____

WORK NO.: (____) _____

(____) _____

FAX NO.: (____) _____

(____) _____

Check here if there are more than two (2) defendants and/or defense attorneys involved in this case, and attach a separate sheet that includes the required information for all such additional persons.

SIGNATURE(S) -- (Each Defense Attorney or Pro Se Defendant is Required to Sign and Date the document below):

PRINT

PRINT

_____/s/ Joel H. Holt

Holt

SIGNATURE

SIGNATURE

DATED

DATED