

**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, JAMIL
YOUSUF, and MANAL YOUSEF**,
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

CONSOLIDATED WITH

SIXTEEN PLUS CORPORATION,
Plaintiff,

v.

MANAL MOHAMMAD YOUSEF,
Defendant,

and

MANAL MOHAMMAD YOUSEF,
Counter-Plaintiff,

v.

SIXTEEN PLUS CORPORATION,
Counter-Defendant.

CIVIL NO. SX-2016-CV-00065

ACTION FOR
DECLARATORY JUDGMENT,
CICO and FIDUCIARY DUTY

COUNTERCLAIM

JURY TRIAL DEMANDED

CONSOLIDATED WITH

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

JOINT STIPULATION RE SCHEDULING ORDER

The parties, under the direction of the Special Master to meet and confer with regard to the submission of a new Scheduling Order, have agreed upon the attached new Scheduling Order filed with this stipulation as Exhibit 1

The parties have agreed to allow Joel Holt to file this joint stipulation for all parties.

Respectfully Submitted,

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

Dated: July 12, 2024

/s/ Joel H. Holt

Joel H. Holt, Esq. (Bar # 6)
*Counsel for Sixteen Plus Corp.
and Hisham Hamed*
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/s/ Christopher Allen Kroblin
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CERTIFICATE OF DOCUMENT LENGTH AND 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 **July 12, 2024**, I served a copy of the foregoing by email and the Court's E-File system, as agreed by the parties, to:

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Sixteen Plus Corporation

/s/ Joel H. Holt

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

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

Plaintiff,

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**FATHI YUSUF, ISAM YOUSUF
AND JAMIL YOUSUF,**

Defendants,

v.

SIXTEEN PLUS CORPORATION,

Nominal Defendant.

SIXTEEN PLUS CORPORATION,

Plaintiff and Counter-Defendant,

v.

MANAL MOHAMMAD YOUSEF

Defendant and Counter-Plaintiff.

MANAL MOHAMMAD YOUSEF,

Plaintiff and Counter-Defendant,

v.

SIXTEEN PLUS CORPORATION,

**Defendant, Counter-Plaintiff, and
Third-Party Plaintiff**

v.

FATHI YUSUF,

Third-Party Defendant.

CIVIL CASE NO. SX-2016-CV-650

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

JURY TRIAL DEMANDED

CASE NO. SX-2016-CV-00065

**ACTION FOR DECLARATORY
JUDGMENT, CICO, AND FIDUCIARY
DUTY; COUNTERCLAIM**

JURY TRIAL DEMANDED

CASE NO. SX-2017-CV-342

**ACTION FOR DEBT AND
FORECLOSURE; COUNTERCLAIM
FOR DAMAGES; THIRD PARTY
ACTION**

JURY TRIAL DEMANDED

CONSOLIDATED SCHEDULING ORDER

THIS MATTER is before the Court on the Proposed Consolidated Amended Scheduling Order filed by Hisham Hamed, Sixteen Plus Corporation, Fathi Yusuf, Isam Yousuf, Jamil Yousuf,

and Manal Mohammed Yousef through their respective counsel pursuant to the Special Master's Order entered on June 6, 2024. The Special Master having considered the premises, it is hereby

ORDERED that the Proposed Consolidated Amended Scheduling Order is **ADOPTED** and the following scheduling plan shall govern the remainder of the three consolidated cases: *Sixteen Plus Corp. v. Yousef*, Civil Case No. SX-2016-CV-065, *Hamed v. Yousef, et al.*, Civil Case No. SX-2016-CV-650, and *Yousef v. Sixteen Plus Corp.*, SX-2017-CV-342:

1. The parties have previously mediated their dispute without success and they will notify the Court if further mediation is desired. Rule 90 of the Virgin Islands Rules of Civil Procedure shall govern all mediation sessions conducted in this civil action, except as otherwise stipulated by the parties hereto.
2. All fact discovery has been completed
3. Two remaining motions to compel have been filed and are pending. The Parties are working on trying to resolve these two outstanding discovery issues by the deadline set by the Court. All other motions have been resolved and are the subject of a stipulation filed on this same date.
4. There is one motion to amend the pleadings that the Parties are discussing to see if it can be amicably resolved.
5. Parties shall serve notices identifying their affirmative expert witnesses and said expert witnesses' curriculum vitae and written reports, not later than **December 16, 2024**.
6. Parties shall serve notices identifying their rebuttal expert witnesses and said expert witnesses' curriculum vitae and written reports not later than **February 15, 2025**.
7. All expert witness depositions, for purposes of discovery and to preserve testimony for trial, shall be completed not later than **April 15, 2025**.
8. *Daubert/Kuhmo* motions shall be filed and served not later than **July 1, 2025**.
9. All dispositive motions shall be filed by **July 1, 2025**.
10. All motions in limine and V.I. Rule of Evidence 104 motions shall be filed and served not later than thirty (30) days prior to trial.
11. A trial date will be scheduled by separate Order of the Court.

12. A proposed Joint Final Pretrial Order shall be prepared by the parties pursuant to V.I. R. Civ. P. 16-1 and shall be submitted on a date to be scheduled by the Court.

Dated: _____

EDGAR D. ROSS
Special Master

ATTEST:

TAMARA CHARLES

Clerk of the Court

BY: _____

Court Clerk Supervisor ____/____/____