

**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

**HAMED'S MOTION FOR THE SPECIAL MASTER'S APPROVAL
OF A LETTER to STM ENTITIES PURSUANT TO THE COURT'S ORDER**

COMES NOW, counsel in this action, Joel H. Holt, and moves this Court for an order directing Attorney Christopher Allen Kroblin to transmit the attached letter, Exhibit A, to the bank, police and prosecutor's offices as set forth in the Special Master's order dated September 17, 2024.

Counsel have discussed this matter on several occasions, but Isam Yousuf has not approved the letter. The Special Master is asked to note that any responses will be

sent to Attorney Kroblin, and thus, no documents will be obtained (or seen by Plaintiff's counsel) that are not reviewed by Attorney Kroblin first--for compliance with the Court's order.

WHEREFORE, it is requested that the Special Master enter the Order being filed with this Motion, directing Attorney Kroblin to send the letter.

Respectfully,

Dated: October 7, 2024

/s/ Joel H. Holt
Joel H. Holt, Esq. (Bar # 6)
Counsel for Plaintiff
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 this filing comports with the page and word length requirements of this Court's Rules, and that on the 7th day of October, 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

Kevin Rames
Counsel for Nominal Defendant
Sixteen Plus Corporation

/s/ Joel H. Holt

**On the letterhead of
ISAM YOUSUF**

Date

Banque Française Commerciale
Antilles Guyane
MARIGOT, 97150 Saint-Martin

[[**Version to authorities**]]
[[in the 2 other letters]]
[[to the police and]]
[[prosecutor]]

Re:

Request for Documents of Isam Yousuf or Island Appliances

Dear Sir or Madam:

I am Isam Yousuf, your former client. [[I am a resident of this district, Isam Yousuf]]. I write to request the following documents.

- a. All monthly account statements or other documents [[that have been provided to you]] for any checking, savings, investment, brokerage account titled to Isam Yousuf or in Isam Yousuf's name or my d/b/a "Island Appliances" from 1990 through 1997;
- b. all documents [[that have been provided to you]] reflecting the source of all funds in the account used to make the wire transfer that was sent by me to the U.S. Virgin Islands on or about February 19, 1997; and all such documents showing the transfer of funds pursuant to the February 19, 1997 wire transfer.

This should include any documents that meet these requirements that were provided by BFC to the police, investigators or prosecutors.

Please send any responsive documents to my USVI attorney:

Christopher Allen Kroblin
Counsel for Isam Yousuf
KELLERHALS FERGUSON KROBLIN PLLC
Royal Palms Professional Building
9053 Estate Thomas, Suite 101
St. Thomas, V.I. 00802-3602
Telephone: (340) 779-2564
ckroblin@kellfer.com

Thank you for your kind attention in this matter.

Sincerely

Isam Yousuf