

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

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**

JURY TRIAL DEMANDED

**RULE 6-1(d) DECLARATION
IN SUPPORT OF SIXTEEN PLUS' MOTION RE IN PARI DELICTO**

I, Joel H. Holt, declare, pursuant to V.I. R. CIV. P. 84, as follows:

1. On January 1, 2023, the counterclaim-defendant, Sixteen Plus, filed a motion to amend its answer to add a sentence clarifying its affirmative defense of "in pari delicto".
2. On February 21, 2023, Manal Yousef, filed her opposition to the motion.
3. On February 23, 2023, Sixteen Plus filed its reply to the opposition.
4. Recently, in the companion CICO/Fraud action (650), Manal Yousef filed an Answer to the Second Amended Complaint in which she asserted the "in pari delicto" affirmative defense to the same transaction at issue in this case, stating in her Answer dated September 16, 2024 at page 5, para. 3:

Hamed v. Yusuf, et al.
Answer to Supplemental Complaint

Case No. SX-2016-CV-650
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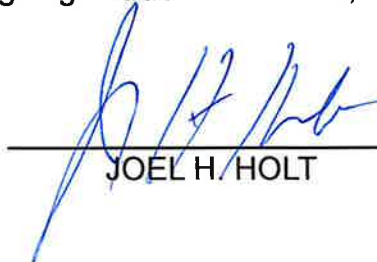
3. Plaintiffs are barred from recovery by the doctrine of in pari delicto because their own wrongful acts.

EXHIBIT

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5. Thus, Manal Yousef has asserted the same affirmative defense of in pari delicto that she objects to Sixteen Plus seeking to have available to it.

I declare under penalty of perjury that the foregoing is true and correct, executed on this 8th day of October, 2024.



JOEL H. HOLT