

**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**

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

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

Comes now Sixteen Plus, by counsel, and hereby gives notice of filing the attached Rule 6-1(d) declaration to supplement the record re its pending motion to amend its answer to add a sentence clarifying its affirmative defense of "in pari delicto". See Exhibit 1.

In this regard, Rule 6-1(d) provides as follows:

(d) Supporting Affidavits or Documents. When allegations of fact not appearing of record are relied upon in support of a party's motion, response, or reply, unless the court grants permission for a different schedule for the filing of supporting materials: (1) all then-available affidavits and other documents supporting the party's position shall be filed simultaneously with the motion, response or reply; (2) **any supplemental affidavits or other documents in support of the party's position on the motion must be filed at least 10 days prior to hearing of the motion;** and (3) if supplemental affidavits or other documents are filed by any party under

subpart (d)(2), any other party may submit additional affidavits or documents at least 5 days prior to hearing of the motion. (Emphasis added).

**Dated:** October 8, 2024

/s/Joel H. Holt  
**Joel H. Holt, Esq.** (Bar # 6)  
Counsel for Plaintiff  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> 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

**Courtesy Copy to :**

**Kevin Rames**  
Counsel for Nominal Defendant  
Sixteen Plus Corporation

/s/ Joel H. Holt