

**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 With

CIVIL NO. SX-2016-CV-00065

**ACTION FOR
DECLARATORY JUDGMENT,
CICO and FIDUCIARY DUTY**

COUNTERCLAIM

JURY TRIAL DEMANDED

SIXTEEN PLUS CORPORATION,
Plaintiff,

v.

MANAL MOHAMMAD YOUSEF,
Defendant.,

and

MANAL MOHAMMAD YOUSEF,
Counter-Plaintiff.,

v.

SIXTEEN PLUS CORPORATION,
Counter-Defendant.

ORDER

THIS MATTER having come on before the Court on Sixteen Plus Corporation's motion pursuant to V.I. R. CIV. P. 15(a)(2), to allow it to amend its two answers in the original, pre-consolidation 65 and 342 actions, and the Court being fully informed in the premises:

IT IS HEREBY ORDERED that:

1. The Sixteen Plus June 7, 2017 Answer to Manal's Amended Counterclaim, affirmative defense paragraph 7, in 65 is amended as follows:

7. Defendant is barred from the relief sought in the Amended Counterclaim because the sham note and mortgage referred to in the Amended Counterclaim are unenforceable because the sham note and mortgage were procured as part of and in furtherance of a fraudulent criminal conspiracy in which Defendant was an active participant. In the alternative, the Court *should decline to hear the substance of these matters as there was an overarching series of coupled illegal activities in which all knowingly and intentionally participated.*

2. The Sixteen Plus October 12, 2017 Answer and Counterclaim to Manal's Complaint in 342 is amended as follows:

8. The Plaintiff's Complaint and attached Note and Mortgage are unenforceable due to the illegality of the transaction. In the alternative, the Court *should decline to hear the substance of these matters as there was an overarching series of coupled illegal activities in which all knowingly and intentionally participated.*

It is **SO ORDERED**.

Dated: _____, 2023

ATTEST: TAMARA CHARLES,
the Court

Douglas A. Brady
Judge of the Superior Court Clerk of

By: Court Clerk Supervisor