IN THE DISTRICT COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX	
Eleanor Abraham, et al.,)
Plaintiffs,))
V.) CIVIL NO. SX-12 CV-11
St. Croix Renaissance Group, LLLP,	ACTION FOR DAMAGES
Defendant.) JURY TRIAL DEMANDED

DEFENDANT ST. CROIX RENAISSANCE GROUP LLLP'S MOTION FOR SEVERANCE PURSUANT TO RULE 21

The complaint filed in this case lists over 500 plaintiffs seeking damages for property damages and personal injuries from different kinds of alleged exposures (asbestos, bauxite ore, bauxite residue, etc.) that allegedly emanated for years from the former alumina processing plant located on a site now owned by the defendant, St. Croix Renaissance ("SCRG").

SCRG hereby moves pursuant to Rule 21 to dismiss this case for misjoinder of unrelated claims.

The basis for this motion is more fully set forth in the memorandum filed with this motion, which is incorporated herein by reference. For the reasons set forth therein, it is respectfully submitted that the relief sought pursuant to Rule 21 be granted, dismissing this case except for the first named plaintiff or, alternatively, severing all claims.

Dated: August 6, 2012

/s/Joel H. Holt, Esq.
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Dated: August 6, 2012

/s/Carl J. Hartmann III, Esq. Counsel for Defendant SCRG 5000 Estate Coakley Bay, L-6 Christiansted, St. Croix U.S. Virgin Islands 00820 Telephone: (340) 719-8941 Email: carl@hartmann.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2012, I filed the foregoing with the Clerk of the Court, and delivered by ECF to the following:

Lee J. Rohn, Esq. Law Office of Rohn and Carpenter, LLC 1101 King St. Christiansted, VI 00820 Counsel for the Plaintiffs

/s/Joel H. Holt