

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

SIXTEEN PLUS CORPORATION,)	
)	CIVIL NO. SX-16-CV-65
Plaintiff/Counterclaim Defendant,)	
)	ACTION FOR
vs.)	DECLARATORY JUDGMENT
)	
MANAL MOHAMMAD YOUSEF,)	JURY TRIAL DEMANDED
)	
Defendant/Counterclaim Plaintiff.)	
)	

NOTICE OF FILING
MANAL MOHAMMAD YOUSEF'S RESPONSE TO
PLAINTIFF SIXTEEN PLUS'
FIRST SET OF REQUESTS FOR ADMISSION

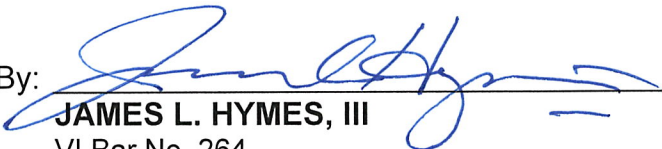
COMES NOW the defendant, **MANAL MOHAMMAD YOUSEF** (hereinafter “**MMY**”), by and through her undersigned attorneys, the Law Offices of James L. Hymes, III, P.C. (***James L. Hymes, III, of Counsel***), without waiving any objections to subject matter jurisdiction, personal jurisdiction, service of process, improper venue, insufficiency of process, insufficiency of service of process, or failure to state a claim upon which relief can be granted, or any other defense or objection which may be presented whether by pleading or motion in this action, and pursuant to the provisions of LRCI 26.2(c) and Fed.R.Civ.P. 26(a)(1), provides Notice of Filing her Response to Plaintiff Sixteen Plus' First Set of Requests for Admission by serving same on plaintiff's counsel as set forth in the Certificate of Service, below.

Respectfully Submitted,

DATED: July 14, 2017.

LAW OFFICES OF JAMES L. HYMES, III, P.C.
Counsel for Defendant –
Manal Mohammad Yousef

By:


JAMES L. HYMES, III

VI Bar No. 264

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CERTIFICATE OF SERVICE

I hereby certify that this document complies with the page or word limitation set forth in Rule 6-1(e). I hereby further certify that on this the 14th day of July, 2017, I caused an exact copy of the foregoing ***“Notice Of Filing Manal Mohammad Yousef's Response To Plaintiff Sixteen Plus' First Set Of Requests For Admission”*** together with the responses referred to therein, to be served electronically by e-mail, and by mailing same, postage pre-paid, to the following counsel of record:

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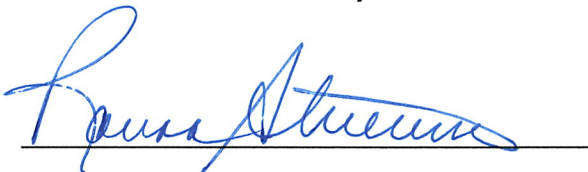
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**MANAL MOHAMMAD YOUSEF'S RESPONSE TO
PLAINTIFF SIXTEEN PLUS'
FIRST SET OF REQUESTS FOR ADMISSION**

The Defendant, **MANAL MOHAMMAD YOUSEF** (hereinafter "**Manal Yousef**"), through her undersigned Attorney, James L. Hymes, III, hereby responds to Plaintiff Sixteen Plus' First Set of Requests for Admission as follows:

GENERAL OBJECTIONS

1. Manal Yousef submits and incorporates into each request the following general objections to Plaintiff's First Set of Requests for Admission set forth herein, and further, by submitting her responses to the Plaintiff's Requests for Admission, does not waive any objections to subject matter jurisdiction, personal jurisdiction, service of process, improper venue, insufficiency of process, insufficiency of service of process, or failure to state a claim upon which relief can be granted, or any other

defense or objection which may be presented whether by pleading or motion in this action:

2. Manal Yousef objects to each request contained in Plaintiff's First Set of Requests for Admission to the extent such request asks for communications between her and her lawyers; these attorney-client communications are privileged and not subject to disclosure.

3. Manal Yousef objects to each request contained in Plaintiff's First Set of Requests for Admission to the extent such request asks for disclosure of material prepared by or for her lawyers or her representatives in the course of securing legal counsel, or in anticipation and defense of litigation; this material is protected from disclosure by the work product doctrine. Similarly, Manal Yousef objects to each request contained in Plaintiff's First Set of Requests for Admission to the extent such request asks for communications between her and her lawyers on the grounds of the privilege afforded to parties with a common interest or joint defense.

4. Manal Yousef has made the following responses without waiving: (1) the right to object to the use of any response for any purposes, in this action or in any other actions, on the grounds of privilege, relevance, materiality, or anything else appropriate; (2) the right to object to any other requests involving or relating to the subject matter of this response; and (3) the right to revise, correct, supplement, or clarify these responses should his ongoing investigation in defense of this action warrant such changes.

5. Manal Yousef generally objects to any request that purports to impose requirements more burdensome and beyond the scope of those set forth under the

Federal Rules of Civil Procedure, including without limitation Rule 36. Furthermore, objection is made to each and every request that is uncertain as to time and purports to request admissions as to facts or circumstances unrelated in time to any issue or claim in this action.

REQUESTS FOR ADMISSIONS

1. **ADMIT** that Fathi Yusuf is your uncle.

RESPONSE:
Admit.

2. **ADMIT** that Isam Yousef is your brother.

RESPONSE:
Admit.

3. **ADMIT** that Jamil Yousef is your nephew.

RESPONSE:
Admit.

4. **ADMIT** that you resided in St. Martin in 1997.

RESPONSE:
Admit.

5. **ADMIT** that over the course of your lifetime that you personally had not earned more than an aggregate of one million dollars in wages or investment income as of February 13, 1997.

RESPONSE:

Admit.

6. **ADMIT** that over the course of your lifetime that you personally, never had more than one million dollars in assets in any personal savings account, checking account, investment account or brokerage account that was in your name as of February 13, 1997.

RESPONSE:

Deny. Assets given to Manal Yousef by her father were maintained in a fund managed by Manal's brother.

7. **ADMIT** that you personally did not use any of your own funds for the loan made to Sixteen Plus that is evidenced by the Promissory Note attached hereto as Exhibit 1.

RESPONSE:

Deny. Manal Yousef made a loan to Sixteen Plus Corporation from money given to her by her father.

8. **ADMIT** that Fathi Yusuf requested that you sign the Power of Attorney attached hereto as Exhibit 2.

RESPONSE:

Deny. The request to sign the Power of Attorney came from Waleed Hamed to Manal Yousef, through Manal's brother, Isam.

9. **ADMIT** that you lived in St, Martin at the time you signed the Power of Attorney attached hereto as Exhibit 2.

RESPONSE:

Admit.

10. **ADMIT** that you never spoke to the lawyer in St. Martin who sent the letter attached as Exhibit 3 before the date on the letter.

RESPONSE:

Admit. Manal Yousef's nephew contacted a lawyer in St. Maarten on Manal's behalf pursuant to a general Power of Attorney given to her nephew by Manal.

11. **ADMIT** that you never spoke to Kye Walker at any time prior to April 1, 2017.

RESPONSE:

Denied. Attorney Walker and Manal Yousef had a personal telephone conversation.

12. **ADMIT** that you have never spoken to James Hymes at any time prior to June 1, 2017.

RESPONSE:

Admit. Manal Yousef's nephew has contacted James Hymes and spoken with him on Manal's behalf pursuant to a general Power of Attorney given by Manal to her nephew.

13. **ADMIT** that you are not entitled to keep any funds related to the repayment of the Promissory Note attached hereto as Exhibit 1.

RESPONSE:

Deny. The money which Manal Yousef loaned to Sixteen Plus Corporation came from her own personal assets, and she is entitled to repayment of the principal amount of the loan, interest, and other expenses as provided for in the loan documents.

Respectfully Submitted,

DATED: July 14, 2017.

LAW OFFICES OF JAMES L. HYMES, III, P.C.
Counsel for Defendant –
Manal Mohammad Yousef

By: _____

JAMES L. HYMES, III

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