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

SIXTEEN PLUS CORPORATION,	)
Plaintiff, V.	Civil No. SX-16-CV-65 ACTION FOR DECLARATORY JUDGMENT
MANAL MOHAMMAD YOUSEF,	)
Defendant.	) ) )

#### NOTICE OF FILING OF SUPPLEMENTAL DECLARATION RE YOUSEF'S MOTION FOR A PROTECTIVE ORDER

The Plaintiff, pursuant to V.I. R. CIV. P. 6-1(d)(2), files a supplemental declaration in support of its position on the pending motions (it being more than 10 days prior to any hearing of the motion that is not yet fully briefed.

Appended as **Exhibit 1** is the sworn declaration of **HUSSEIN AL-MADANI** an Attorney-at-Law, admitted to the practice of law in Amman, Jordan, which is relevant to Yousef's ability to travel from Jordan, which is self-explanatory

Dated: July 27, 2017

Joel H. Holt, Esq. (Bar # 6)

Counsel for Plaintiffs

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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), and that on this 27th day of July, 2017, I served a copy of the foregoing by mail and email, as agreed by the parties,

James Hymes VI
Bar No. 264
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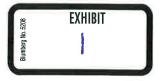
# IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS DIVISION OF ST. CROIX

SIXTEEN PLU	S CORPORATION,	)
	Plaintiff/Counterclaim Defendant,	) ) )
٧		) Civil No. SX-16-CV-65
MANAL MOHAMMAD YOUSEF,		) )
	efendant/Counterclaim laintiff.	) ) )

### **DECLARATION OF HUSSEIN AL-MADANI**

- I, HUSSEIN AL-MADANI, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as well as V.I.R. Civ. P. 84, as follows:
  - 1. I have personal knowledge of the matters set forth herein.
  - 2. I am an Attorney at Law in Amman, Jordan.
- 3. I have reviewed the Defendant MANAL MOHAMMAD YOUSEF's prior, Jordanian passport.
- 4. I do not know if she presently has a Jordanian passport as I have been informed that she has refused to provide a copy of her present passport.
  - 5. I can state the following as a matter of Jordanian law:
    - a. If she holds a Jordanian Passport she is free to travel anywhere in the world provided that she obtains a proper visa.
    - b. If she holds a Jordanian Passport her ability to travel using her Jordanian passport would not be affected because she is a resident of the Palestinian Territories.
    - c. There are daily flights available from Jordan to the United States.





I declare under penalty of perjury under the laws of the United States Virgin Islands that the foregoing is true and correct.

Executed in Ammon, Jordan, on July 25, 2017

Dated: 25/1/2017

HUSSEIN AL-MADANI

Attorney-at-Law