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

SIXTEEN PLUS CORPORATION...

Plaintiff/Counterclaim Defendant,

۷.

MANAL MOHAMMAD YOUSEF

Defendant/Counterclaim Plaintiff

CIVIL NO. ST-16-CV- 0065

ACTION FOR DECLARATORY JUDGMENT

JURY TRIAL DEMANDED

NOTICE OF FILING RE LIS PENDENS

The Plaintiff hereby gives notice of filing a Notice of Lis Pendens on Affected

Real Property as per the attached Exhibit 1.

Dated: August 1, 2017

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

Counsel for Plaintiffs
Law Offices of Joel H. Holt
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Email: meckard@hammeckard.com Counsel to Sixteen Plus Corporation

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 1st day of August, 2017, a copy was served by hand delivery and email, as agreed by the parties,

James Hymes VI
Bar No. 264
Counsel for Manal Yousef
1131 King Street
Suite 309
Christiansted, VI 00820
jim@hymeslawvi.com
rauna@hymeslawvi.com

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

Defendant.	
MANAL MOHAMMAD YOUSEF,)
v.) ACTION FOR) DECLARATORY JUDGMENT
SIXTEEN PLUS CORPORATION, Plaintiff,) Civil No. SX-15-CV-65

NOTICE OF LIS PENDENS

PLEASE TAKE NOTICE that the above-captioned civil action is currently pending in the Superior Court of the Virgin Islands, on the Complaint of the above-captioned plaintiff, Sixteen Plus Corporation ("Plaintiff") and against the above-captioned defendant, Manal Mohammad Yousef ("Defendant"), wherein Plaintiff seeks declaratory judgment against Defendant concerning, among other things, the invalidity and unenforceability of that certain purported mortgage dated September 15, 1997 and recorded on February 22, 1999 in PC 679, at page 33 as Document No. 768/1999 against the below listed real property (collectively, the "Affected Real Property"):

Parcel No. 8, Estate Cane Garden, consisting of approximately 2.6171 U.S. Acres;

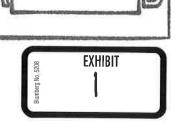
Remainder no. 46A, Estate Cane Garden, consisting of approximately 7.6460 U.S. Acres;

Parcel No. 10, Estate Cane Garden, consisting of approximately 2.0867 U.S. Acres;

Road Plot No. 11, Estate Cane Garden, consisting of approximately 0.868 U.S. Acres;

Parcel No. 11, Estate Retreat, Matr. No. 37B of Company Quarter and Peter's Minde, Matr. No. 37A and 37BA, Company Quarter, and No. 54 Queen's Quarter all consisting of approximately 42.3095 U.S. Acres:





2017

Remainder Matr. 32B, Estate Cane Garden of approximately 48.5175 U.S. Acres;

Parcel No. 9 Estate Cane Garden, consisting of approximately 11.9965 U.S. Acres;

Remainder Matr. 32A, Estate Granard, consisting of approximately 41.0736 U.S. Acres;

Parcel No. 40, Estate Granard, consisting of approximately 14.9507 U.S. Acres;

Remainder Matr. No. 31, Estate Diamond, consisting of approximately 74.4220 U.S. Acres;

Parcel No. 4, Estate Diamond, consisting of approximately 5.8662 U.S. Acres;

Parcel No. 1, Estate Diamond, consisting of approximately 61.2358 U.S. Acres;

Parcel No. 3, Estate Diamond, consisting of approximately 6.9368 U.S. Acres;

Parcel No. 2, Estate Diamond, consisting of approximately 6.5484 U.S. Acres;

Road Plot No. 12, Estate Cane Garden, consisting of approximately 0.4252 U.S. Acres;

Road Plot No. 41, Estate Granard, consisting of approximately 0.4255 U.S. Acres; and

Road Plot No. 6, Estate Diamond, of approximately 0.8510 U.S. Acres.

PLEASE TAKE FURTHER NOTICE that the above-captioned civil action touches upon and affects all of the Affected Real Property.

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Respectfully submitted,

HAMM RHEA ECKARD, LLP

Dated: July 31, 2017

By: Carpbell C. Rhen For Mark W. Eckard (VI Bar No. 1051)

5030 Anchor Way, Suite 13 Christiansted, VI 00820-4692 Telephone: (340) 773-6955

Facsimile: (855) 456-8784 Email: meckard@usvi.law

- and -

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Email: holtvi@aol.com

Counsel to Sixteen Plus Corporation



RECORDER OF DEEDS-STX

Vendor: GOVE000PRDMH-Government of the Virgin Islands

Amount: \$92,00

Firm's Acct #:

Invoice Amount

Invoice Description

Sixteen Plus v. Yousef - Record Lis Pendens (various plots)

Client Amount

\$92.00

Date: 07/31/2017 Invoice Number

arrctimg@168-69

MISCELLANEOUS PAYMENT RECPT#: 3678336

Gov't of the U.S. Virgin Islan

2314 Kronprindsens Gade Charlotte Amalie VI 00802

DATE: 07/31/17

TIME: 09:50

CLERK: jarilyn.d

DEPT: LTGOVSTX

CUSTOMER#: 0

COMMENT: LIS PENDENS

CHG: 2155B2 RECORDING, ATTE

92.00

AMOUNT PAID:

92.00

PAID BY:

ATTY ECKARD

PAYMENT METH: CHECK

3524

REFERENCE:

AMT TENDERED:

92.00

AMT APPLIED:

92.00

.00

CHANGE:

Transaction #: 782052

Sandra Horsford District Recorder of Deeds St. Croix Office of the Recorder of Deeds 1131 King Street, Suite 101 St. Croix, VI 00820

(340) 773-6449

Doc#: 2017002803 Pages: 3 Book: 1477 Page: 352

Recorded: 07/31/2017 09:47:57 AM

Type: LIS PENDENS

MISC RECORDING FEES:

\$28,00 \$64.00

ATTACH FEE:

Total Fees: A --- AT THE REPORT OF THE PARTY NAMED IN

Check - 3524

\$92,00

Change:

\$0.00

Filed By: ATTY ECKARD 07/31/2017 09:47:57 AM Total Documents: 1

Cashier: Shorsford