

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

HISHAM HAMED , individually, and Derivatively, on behalf of SIXTEEN PLUS CORPORATION ,)	
)	
Plaintiff,)	CIVIL NO. SX-16-CV-650
)	
vs.)	DERIVATIVE SHAREHOLDER SUIT, ACTION FOR DAMAGES AND CICO RELIEF
)	
FATHI YUSUF, ISAM YOUSUF and JAMIL YOUSEF ,)	JURY TRIAL DEMANDED
)	
Defendants.)	
)	
and)	
)	
SIXTEEN PLUS CORPORATION ,)	
)	
a nominal Defendant,)	
)	

**RESPONSE OF DEFENDANTS ISAM YOUSUF AND JAMIL YOUSUF TO
PLAINTIFF’S MOTION TO AMEND FIRST AMENDED COMPLAINT**

Defendants, Isam Yousuf (“Isam”) and Jamil Yousuf, incorrectly identified as Jamil Yousef (“Jamil”), by and through their undersigned counsel, do not object to the Plaintiff’s Motion to Amend its First Amended Complaint seeking to correct the spelling of the name of Jamil and to dismiss two (2) counts, Count II (Conversion) and Count V (Civil Conspiracy), on the assumption that plaintiff’s counsel has performed his V.I. R. Civ. P. 11 obligation and determined that there is no basis for the claims he seeks to eliminate. Defendants Isam and Jamil reserve all rights to object to the matters set forth in those papers and nothing in this response shall be taken as a waiver of the Defendants’ rights to contest any matters set forth in those

papers. Specifically, Defendants Isam and Jamil do not voluntarily appear in this matter, do not submit to the jurisdiction of the Court, and do not waive any objections to subject matter jurisdiction, personal jurisdiction, 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.

Respectfully Submitted,

DATED: August 15, 2017.

LAW OFFICES OF JAMES L. HYMES, III, P.C.
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Isam Yousuf, and Jamil Yousuf

By: 

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CERTIFICATE OF SERVICE

I hereby certify this document complies with the page or word limitation set forth in V.I. R. Civ. P. 6-1(e) and that on this the 15th day of August, 2017, I caused an exact copy of the foregoing "*Response of Defendants Isam Yousuf and Jamil Yousuf to Plaintiff's Motion to Amend First Amended Complaint*" to be served electronically by e-mail, and by mailing same, postage pre-paid, to the following counsel of record:

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