

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

MANAL MOHAMMAD YOUSEF, a/k/a MANAL MOHAMAD YOUSEF,)	
)	
)	CIVIL NO. SX-17-CV-342
Plaintiff,)	
)	ACTION FOR DEBT AND
vs.)	FORECLOSURE OF REAL
)	PROPERTY MORTGAGE
SIXTEEN PLUS CORPORATION,)	
)	COUNTERCLAIM FOR
Defendant.)	DAMAGES
_____)	
)	JURY TRIAL DEMANDED
SIXTEEN PLUS CORPORATION,)	
)	
Counterclaim Plaintiff,)	
)	
Vs.)	
)	
MANAL MOHAMMAD YOUSEF a/k/a)	
MANAL MOHAMAD YOUSEF and)	
FATHI YUSUF,)	
)	
Counterclaim Defendants.)	
_____)	

**RESPONSE OF DEFENDANT MANAL YOUSEF TO
PLAINTIFF'S MOTION FOR CONSOLIDATION**

Plaintiff/Counterclaim Defendant, Manal Mohammad Yousef (“Yousef”), by and through her undersigned counsel, respectfully requests the Court postpone any filings on defendant’s motion for consolidation and issue a briefing schedule pertaining thereto after rulings are rendered on pending motions. Sixteen Plus Corporation (“16 Plus”) seeks to consolidate two (2) matters styled as *Manal Yousef v. 16 Plus Corporation v. Manal Yousef and Fathi Yusuf*,

RESPONSE OF DEFENDANT MANAL YOUSEF TO PLAINTIFF'S MOTION FOR CONSOLIDATION

Civil No. ST-17-CV-342 (this action) and *Sixteen Plus Corporation v. Manal Yousef v. Sixteen Plus Corporation*, Civil No. SX-16-CV-65. This case includes third-party defendant Fathi Yusuf, who is not a named-party in the latter above-referenced matter. There are pending motions to disqualify 16 Plus' counsel Joel H. Holt, Esquire in both actions. Also pending is third-party defendant Fathi Yusuf's motion to dismiss third-party claim in this case. Yousef submits it would be a more prudent use of judicial resources and private resources if the Court first decides pending motions to disqualify and third-party defendant Fathi Yusuf's motion to dismiss especially where Fathi Yusuf is not a named party in the other action.

WHEREFORE, on the basis of the foregoing, Manal Yousef respectfully requests the Court issue a briefing schedule for the motion for consolidation after rulings are rendered on pending motions to disqualify Sixteen Plus Corporation's counsel and Third-Party Defendant Fathi Yusuf's pending motion to dismiss third-party claim.

Respectfully Submitted,

DATED: January 2, 2018.

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

By: 

JAMES L. HYMES, III

VI Bar No. 264

P.O. Box 990

St. Thomas, Virgin Islands 00804-0990

Telephone: (340) 776-3470

Facsimile: (340) 775-3300

E-Mail: jim@hymeslawvi.com;

rauna@hymeslawvi.com

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 2nd day of January, 2018, I caused an exact copy of the foregoing "**Response of Plaintiff Manal Yousef to Plaintiff's Motion for Consolidation**" to be served electronically by e-mail, and by mailing same, postage pre-paid, to the following counsel of record:

JOEL H. HOLT, ESQ. (VI Bar No. 8)

LAW OFFICES OF JOEL H. HOLT

2132 Company Street

Christiansted, USVI, 00820

holtvi.plaza@gmail.com

Counsel for Defendant/Counterclaim Plaintiff Sixteen Plus Corporation

CARL J. HARTMANN, III, ESQ.

5000 Estate Coakley Bay, L-6

Christiansted, VI 00820

carl@carlhartmann.com

Co-Counsel for Defendant/Counterclaim Plaintiff Sixteen Plus Corporation

GREGORY H. HODGES, ESQ. (VI Bar No. 174)

STEPHEN HERPEL, ESQ. (VI Bar No. 1019)

LISA MICHELLE KÖMIVES, ESQ. (VI Bar No. 1171)

DUDLEY, TOPPER AND FEUERZEIG, LLP

Law House, 10000 Frederiksberg Gade

P.O. Box 756

St. Thomas, VI 00804-0756

ghodges@dtflaw.com

sherpel@dtflaw.com

lkomives@dtflaw.com

Attorneys for Counterclaim Defendant Fathi Yusuf

