

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

SIXTEEN PLUS CORPORATION, ,

Plaintiff/Counterclaim Defendant,

v.

MANAL MOHAMMAD YOUSEF

Defendant/Counterclaim Plaintiff

CIVIL NO. ST-16-CV- 0065

**ACTION FOR
DECLARATORY JUDGMENT**

JURY TRIAL DEMANDED

**SECOND 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 declaration of Joel Holt attaching newly received discovery materials from the Defendant that are relevant to the pending issues raised in her Motion for a Protective Order filed in this case.

Dated: August 7, 2017



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

Counsel for Plaintiffs

Law Offices of Joel H. Holt

2132 Company Street,

Christiansted, VI 00820

Email: holtvi@aol.com

T: (340) 773-8709/ F (340) 773-8677

Mark Eckard, Esquire

5030 Anchor Way, Ste. 13

Christiansted, VI 00820

Telephone: (340) 773-6955

Email: meckard@hammeckard.com

Counsel to Sixteen Plus Corporation

CERTIFICATE OF WORD/PAGE COUNT

This document complies with the page or word limitation set forth in Rule 6-1 (e).



CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2017, I served a copy of the foregoing by hand delivery and email, as agreed by the parties,

James Hymes VI

Bar No. 264

Counsel for Manal Yousef

P.O. Box 990

St. Thomas, Virgin Islands 00804-0990

jim@hymeslawvi.com

rauna@hymeslawvi.com



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JURY TRIAL DEMANDED

DECLARATION OF JOEL H. HOLT

I, Joel H. Holt, declare, pursuant to V.I. R. CIV. P. 84, as follows:

1. I am counsel of record for the Plaintiffs and am familiar with the facts set forth herein.
2. Attached as **Exhibit A** are signatures from documents signed by Manal Yousef demonstrating that she can reach the consulate.
3. Attached as **Exhibit B** is a letter from defense counsel confirming he will be submitting her passports in camera to the Court, which will be relevant to her Motion for a Protective Order.

I declare under penalty of perjury that the foregoing is true and correct, executed on this
7th day of August, 2017.



JOEL H. HOLT

Blumberg No. 5208

EXHIBIT

1

In the Name of Allah, Most Gracious, Most Merciful

General Power of Attorney

I, the undersigned, **Manal Mohammed Yousef Mohammed – Mother Massouda, holding temporary Jordanian passport No T518558**, to appoint and nominate to act on my place **Mr. Jamil Isam Yousuf – American citizen holding American passport No (710234560)** to do and undertake all acts on my behalf including the rights to supervise, intermission, management and to do everything regarding my movable or immovable properties in **United states of America**, whether such properties be of my personal possession or passed to me by way of legal inheritance in any manner whatsoever, and lease, mortgage and sell the said properties to anybody, against any price and as he may deem appropriate, to buy, and register in my name the land, real estate, residential flats, company shares, developments bonds and any other properties and register such in my name, and to sell and assign such properties to whom he likes, build buildings and establishments; obtain building licenses and drawings occupancy permits and all other required permits and, to establish companies, firms, shops, etc., in my individual name or jointly with others, and to enter into a partnerships, define shares, receive any compensations, allowances, bonus amounts, pension salaries, refunds and any other amounts which may become due from any body whatsoever and in all matters related to receiving, disengagement, or paying amounts of money, and to sign on my behalf all papers and transactions related thereto and which may be required by all bodies and departments concerned including the traffic, justice, customs departments, insurance companies, the income tax department, the Ministry of Industry and Trade and all its offices and branches, the Greater Amman Municipality, municipalities, the electricity, water, sewage and telephone authorities, the social security corporation, the surveying and land registration department and in general all the ministries, official and semi official departments and banks, to initiate and file penal and legal lawsuits before all courts of different types, functions, and grades; conciliation, first instance, appeal, and causation, to submit pleads, petitions, serve ordinary and legal notices and responds thereto, and all papers and documents required for serving notices, producing evidence or confirming failure to do so. To enter as a third party, to elect experts, arbitrators, conciliators and dismiss them, and /or approve their decisions, counter claim, cross petition, transfer of suit case, rebut of members, log complaints against judges, and to follow up and process all formalities required by the departments concerned, to demand execution, accept and /or reject settlement, request imprisonment, confirmation or redemption of provisional seizure, and the right to conciliation, discharge, release and bona fide declaration and to receive the amounts realized from the court judgment. I do hereby also authorize my attorney to take loans in my name from banks and financial institutions, to mortgage my movable or immovable properties as a loan security, to open accounts with banks, withdraw amounts therefrom and deposit amounts thereunto in my name, cash cheques, receive deposits and profits realized from the company shares and all matters, whether mentioned or not mentioned herein (even if it is a must to be mentioned), for which a power of attorney may be legally applicable to.

A general power of attorney, authorizing him in terms of words, deeds and opinion, and granting him the power to grant a power of attorney to the persons, lawyers he likes in respect of all the matters he is granted this power of attorney for in part or in full to dismiss them time after time, except for those who grant them a power of attorney for sale and mortgage in the occupied territories 1948 and to grant a power of attorney to third party in respect of immovable properties.

Written on : 22/07/2012, Amman Jordan

(Signature & Official Seal)

Principal

**Manal Mohammed Yousef
Gardens – Al-Desa Street,
Tel. 5690712**

(Signature)

*This document is authenticated
by notary public/ North Amman
Court.*



I, Mosbah A. Zaben, do hereby certify that I am competent to translate that my translation is accurate, and that I have translated the attached document(s) to the best of my knowledge, belief, and ability.



Embassy of the United States of America

Hashemite Kingdom of Jordan)
)
Governorate of Amman)
)
Amman) ss:
)
Embassy of the)
United States of America)

The U.S. Embassy accepts no responsibility for the veracity of the assertions and information contained in this document.

I certify that the official named below, whose true signature and official seal are, respectively and affixed to the annexed document, was, on this day, empowered to act in the official capacity designated in the annexed document, to which faith and credit are due.

Yasir Al-Awamleh
Name of official (Ministry of Foreign Affairs)

Salman K. Khalil
Vice Consul of the United
States of America

24 JUL 2012
Date

(Seal)

LAW OFFICES
OF
JAMES L. HYMES, III, P.C.

MAILING ADDRESS: P.O. BOX 990
ST. THOMAS, VIRGIN ISLANDS 00804-0990
PHYSICAL ADDRESS: NO. 33-1 ESTATE ELIZABETH, # 7736
ST. THOMAS, VIRGIN ISLANDS 00802
E-MAIL: jim@hymeslawvi.com
TELEPHONE: (340) 776-3470 FACSIMILE: (340) 775-3300

REPLY TO:
 ST. THOMAS OFFICE
 CHRISTIANSTED OFFICE

OF COUNSEL:
MARK HILLSMAN
mhillsman@hymeslawvi.com

August 2, 2017

Joel H. Holt, Esq.
LAW OFFICES OF JOEL H. HOLT
2132 Company Street
Christiansted, USVI, 00820
holtvi@aol.com

*Re: Sixteen Plus v. Manal Mohammad Yousef
SCVI/STX - Civil No. SX-16-CV-65*

Dear Attorney Holt:

I am writing to follow-up on the Rule 37 conference we conducted on August 1, 2017. With respect to your Document Request No. 23 wherein you demanded copies of my communications as an attorney with my client, you have agreed to withdraw this demand based on the following:

Manal Mohammad Yousef arranged for my retention as her attorney pursuant to the terms and conditions of a General Power of Attorney granted by her to Jamil Isam Yousuf to do and undertake all acts on her behalf to initiate and respond to legal lawsuits. As a consequence I have always considered Jamil and Manal Mohammad Yousef one and the same for client communication purposes. My communications have been directed in the first instance to Jamil who has made inquiries of Manal Mohammad Yousef, or forwarded any requests for information or assistance by or from me to Manal Mohammad Yousef for a response. Accordingly, this will confirm that we have agreed that I need not prepare a privilege log with respect to my attorney/client communications.

A copy of the General Power of Attorney from Manal Mohammad Yousef to Jamil Yousuf will be provided to you as a supplement to our Rule 26 Initial Disclosures. In addition, the notary certification is provided herewith. An

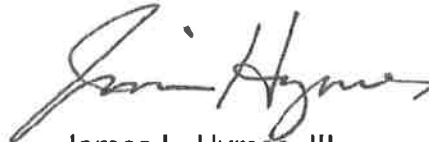
CHRISTIANSTED OFFICE:
1138 KING STREET (THE PENTHENY BUILDING), CHRISTIANSTED, ST. CROIX, U.S. VIRGIN ISLANDS
E-MAIL: rauna@hymeslawvi.com
TELEPHONE: (340) 773-1700 FACSIMILE: (340) 775-3300



JOEL H. HOLT, ESQ.
AUGUST 2, 2017
PAGE 2

amendment to Interrogatory Number No. 9 will be prepared and sent to Manal Mohammad Yousef for execution and provided to you upon receipt by me from her.

Sincerely yours,

A handwritten signature in black ink, appearing to read "James L. Hymes, III". The signature is fluid and cursive, with a large initial "J" and "H".

James L. Hymes, III

JLH:rs

cc: Mark W. Eckard, Esq.
meckard@hammeckard.com

c:\YOUSUF16Plus\2017-08-02...holt...