



THE WALKER LEGAL GROUP

July 25, 2017

VIA E-MAIL AND HAND-DELIVERY

Joel H. Holt, Esq.
2132 Company Street
Christiansted, VI 00820
holtvi@aol.com

**Re: Sixteen Plus Corporation v. Manal Mohammad Yousef, ST-16-CV-0065
Response to *Subpeona Duces Tecum***

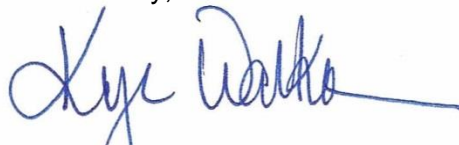
Dear Attorney Holt

I am in receipt of your *subpoena duces tecum* dated June 14, 2017. I object to the subpoena to the extent it seeks written communications between myself and a former client, Manal Yousef. My objection notwithstanding and without waiving any challenges to the Court's lack of personal jurisdiction of Manal Yousef or subject matter jurisdiction overall, I provide the following responses to your subpoena:

1. All written communications exchanged with Manal Yousef since January 1, 2015 regarding the above captioned matter.
Response: None
2. All written communications exchanged with Fathi Yusuf since January 1, 2015 regarding the above captioned matter.
Response: None
3. All written communications exchanged with any lawyer in the law firm of Dudley, Topper and Feuerzeig since January 1, 2015 regarding the above captioned matter.
Response: See email exchanges dated September 15, 2016, November 12, 2016, and March 13, 2017.

Feel free to contact me if you have any questions regarding my responses.

Sincerely,



Kye Walker, Esq.

Kye Walker

From: Kye Walker
Sent: Tuesday, July 25, 2017 9:45 AM
To: Kye Walker
Subject: Fwd: Sixteen Plus v. Manal Yousef, STX Civ. No. 2015-65
Attachments: image001.jpg

----- Forwarded message -----

From: Gregory H. Hodges <ghodges@dtflaw.com>
Date: Sat, Nov 12, 2016 at 1:11 PM
Subject: Re: Sixteen Plus v. Manal Yousef, STX Civ. No. 2015-65
To: Kye Walker <kye@thewalkerlegalgroup.com>
Cc: "Stefan B. Herpel" <sherpel@dtflaw.com>

How about 2 p.m?

Sent from my iPhone

On Nov 12, 2016, at 11:59 AM, Kye Walker <kye@thewalkerlegalgroup.com> wrote:

Good Day Greg:

I just wrapped up a murder trial on Friday, so please excuse my delayed response. I am available to talk on Monday. When is a good time for you?

Kye Walker, Esq.

From: Gregory H. Hodges [mailto:ghodges@dtflaw.com]
Sent: Wednesday, November 9, 2016 3:41 PM
To: 'kye@thewalkerlegalgroup.com'
Cc: Stefan B. Herpel
Subject: Sixteen Plus v. Manal Yousef, STX Civ. No. 2015-65

Good afternoon Kye,

I understand you are defending Ms. Yousef in the subject case. Mr. Fathi Yusuf was recently served with the attached complaint. Would you please call be at your earliest convenience to discuss the status of the subject case and how it may relate to the attached complaint filed on behalf of Hisham Hamed?

Regards,

Greg

Gregory H. Hodges

Dudley, Topper and Feuerzeig, LLP

Law House, 1000 Frederiksberg Gade

St. Thomas, VI 00802

Direct: [\(340\) 715-4405](tel:3407154405)

Fax: [\(340\) 715-4400](tel:3407154400)

Web: www.DTFLaw.com

<image001.jpg>

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Kye Walker

From: Kye Walker
Sent: Tuesday, July 25, 2017 9:50 AM
To: Kye Walker
Subject: Fwd: FW: Hamed v. Yusuf - 16-650
Attachments: 20170313142746.pdf

----- Forwarded message -----

From: **Lisa Komives** <lkomives@dtflaw.com>
Date: Mon, Mar 13, 2017 at 2:53 PM
Subject: FW: Hamed v. Yusuf - 16-650
To: "holtvi@aol.com" <holtvi@aol.com>, "carl@carlhartmann.com" <carl@carlhartmann.com>, "kim@japinga.com" <kim@japinga.com>
Cc: "Gregory H. Hodges" <ghodges@dtflaw.com>, "Stefan B. Herpel" <sherpel@dtflaw.com>, "kye@thewalkerlegalgroup.com" <kye@thewalkerlegalgroup.com>

Good Afternoon, All.

Please note that the email address lkomives@vilaw.com was my email address at my prior firm.

My current email address is lkomives@dtflaw.com.

Thank you.

Lisa

Lisa Michelle Kömives

Attorney

Dudley, Topper and Feuerzeig, LLP

1000 Frederiksberg Gade

St. Thomas, U.S. Virgin Islands 00802

[\(340\) 774-4422](tel:3407744422)

[\(340\) 715-4400](tel:3407154400) Fax

Web: www.dtflaw.com



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From: Joel Holt [<mailto:holtvi@aol.com>]

Sent: Monday, March 13, 2017 2:42 PM

To: Gregory H. Hodges; Stefan B. Herpel; ikomives@vilaw.com; kye@thewalkerlegalgroup.com

Cc: carl@carlhartmann.com; kim@japinga.com

Subject: Hamed v. Yusuf - 16-650

Self explanatory pleading attached.

Joel H. Holt, Esq.

2132 Company Street

Christiansted, St. Croix

U.S. Virgin Islands 00820

[\(340\) 773-8709](tel:3407738709)

Kye Walker

From: Kye Walker
Sent: Tuesday, July 25, 2017 9:44 AM
To: Kye Walker
Subject: Fwd: Fwd: Yusuf v. Peter's Farm - Reply re Opp to Motion to Compel

----- Forwarded message -----

From: Kye Walker <kye@thewalkerlegalgroup.com>
Date: Thu, Sep 15, 2016 at 3:58 PM
Subject: RE: Fwd: Yusuf v. Peter's Farm - Reply re Opp to Motion to Compel
To: "Stefan B. Herpel" <sherpel@dtflaw.com>

Yes, I apologize. I thought my office had forwarded it to you. I'll take care of it when I get back to my hotel this evening.

On Sep 15, 2016 1:41 PM, "Stefan B. Herpel" <sherpel@dtflaw.com> wrote:

Kye,

I still have not received the affirmation or statement from you. Will you able to provide by tomorrow, so that I can file it then?

Stefan

From: Stefan B. Herpel
Sent: Monday, September 12, 2016 2:13 PM
To: 'Kye Walker'
Subject: RE: Fwd: Yusuf v. Peter's Farm - Reply re Opp to Motion to Compel

Kye,

Thanks much. I will look for it this evening or early tomorrow.

I think between my brief and attachments filed last week and Joel's brief of today, you have the information you need.

Stefan

From: Kye Walker [<mailto:kye@thewalkerlegalgroup.com>]
Sent: Monday, September 12, 2016 2:11 PM
To: Stefan B. Herpel
Subject: Re: Fwd: Yusuf v. Peter's Farm - Reply re Opp to Motion to Compel

Stefan:

I will prepare an affirmation to send this evening. I'm out of the country in a different time zone hence the delay in my responses. You will have it in time for filing tomorrow morning.

On Sep 12, 2016 9:31 AM, "Stefan B. Herpel" <sherpel@dtflaw.com> wrote:

Kye,

Attached is Joel Holt's reply in support of the motion to compel disclosure of Manal Yousef's phone number in our case seeking dissolution of Sixteen Plus. He suggests among other things that you may not even be representing Manal. We really need to file your statement in our case. Do you think you can prepare that today?

Regards,

Stefan

Sent from my iPhone

Begin forwarded message:

From: "Joel Holt" <holtvi@aol.com>
To: "Gregory H. Hodges" <ghodges@dtflaw.com>, "Stefan B. Herpel" <sherpel@dtflaw.com>, "dewoodlaw@gmail.com" <dewoodlaw@gmail.com>
Subject: Yusuf v. Peter's Farm - Reply re Opp to Motion to Compel

Please see attached.

Joel H. Holt, Esq.

2132 Company Street

Christiansted, St. Croix

U.S. Virgin Islands 00820

[\(340\) 773-8709](tel:3407738709)

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