

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

SIXTEEN PLUS CORPORATION,

Plaintiff,

V.

MANAL MOHAMMAD YOUSEF,

Defendant.

Civil No. SX-16-CV-65
ACTION FOR
DECLARATORY JUDGMENT

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 sworn declaration of **HUSSEIN AL-MADANI** an Attorney-at-Law, admitted to the practice of law in Amman, Jordan, which is relevant to Yousef's ability to travel from Jordan, which is self-explanatory

Dated: July 27, 2017



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

Counsel for Plaintiffs

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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 27th day of July, 2017, I served a copy of the foregoing by mail and email, as agreed by the parties,

James Hymes VI
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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. SX-16-CV-65

DECLARATION OF HUSSEIN AL-MADANI

I, HUSSEIN AL-MADANI, declare under penalty of perjury pursuant to 28 U.S.C. Section 1746, as well as V.I.R. Civ. P. 84, as follows:

1. I have personal knowledge of the matters set forth herein.
2. I am an Attorney at Law in Amman, Jordan.
3. I have reviewed the Defendant MANAL MOHAMMAD YOUSEF's prior, Jordanian passport.
4. I do not know if she presently has a Jordanian passport as I have been informed that she has refused to provide a copy of her present passport.
5. I can state the following as a matter of Jordanian law:
 - a. If she holds a Jordanian Passport she is free to travel anywhere in the world provided that she obtains a proper visa.
 - b. If she holds a Jordanian Passport her ability to travel using her Jordanian passport would not be affected because she is a resident of the Palestinian Territories.
 - c. There are daily flights available from Jordan to the United States.

Blumberg No. 5208
EXHIBIT
1

I declare under penalty of perjury under the laws of the United States Virgin Islands that the foregoing is true and correct.

Executed in Ammon, Jordan, on July 25, 2017

Dated: 25/7/2017

Hussein K. Al-Madani
Attorney at Law

HUSSEIN AL-MADANI
Attorney-at-Law