

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

**NOTICE OF FILING RE LIS PENDENS**

The Plaintiff hereby gives notice of filing a Notice of Lis Pendens on Affected Real Property as per the attached **Exhibit 1**.

**Dated:** August 1, 2017



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

*Counsel for Plaintiffs*

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**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 1<sup>st</sup> day of August, 2017, a copy was served by hand delivery 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, ) Civil No. SX-15-CV-65  
 )  
 v. ) ACTION FOR  
 ) DECLARATORY JUDGMENT  
 )  
 MANAL MOHAMMAD YOUSEF, )  
 )  
 Defendant. )

RECORDER OF DEEDS STX

RECEIVED  
JUL 31 2017

NOTICE OF LIS PENDENS

PLEASE TAKE NOTICE that the above-captioned civil action is currently pending in the Superior Court of the Virgin Islands, on the Complaint of the above-captioned plaintiff, Sixteen Plus Corporation ("Plaintiff") and against the above-captioned defendant, Manal Mohammad Yousef ("Defendant"), wherein Plaintiff seeks declaratory judgment against Defendant concerning, among other things, the invalidity and unenforceability of that certain purported mortgage dated September 15, 1997 and recorded on February 22, 1999 in PC 679, at page 33 as Document No. 768/1999 against the below listed real property (collectively, the "Affected Real Property"):

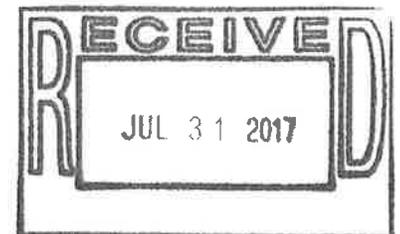
Parcel No. 8, Estate Cane Garden, consisting of approximately 2.6171 U.S. Acres;

Remainder no. 46A, Estate Cane Garden, consisting of approximately 7.6460 U.S. Acres;

Parcel No. 10, Estate Cane Garden, consisting of approximately 2.0867 U.S. Acres;

Road Plot No. 11, Estate Cane Garden, consisting of approximately 0.868 U.S. Acres;

Parcel No. 11, Estate Retreat, Matr. No. 37B of Company Quarter and Peter's Minde, Matr. No. 37A and 37BA, Company Quarter, and No. 54 Queen's Quarter all consisting of approximately 42.3095 U.S. Acres;



Remainder Matr. 32B, Estate Cane Garden of approximately  
48.5175 U.S. Acres;

Parcel No. 9 Estate Cane Garden, consisting of approximately  
11.9965 U.S. Acres;

Remainder Matr. 32A, Estate Granard, consisting of approximately  
41.0736 U.S. Acres;

Parcel No. 40, Estate Granard, consisting of approximately  
14.9507 U.S. Acres;

Remainder Matr. No. 31, Estate Diamond, consisting of  
approximately 74.4220 U.S. Acres;

Parcel No. 4, Estate Diamond, consisting of approximately 5.8662  
U.S. Acres;

Parcel No. 1, Estate Diamond, consisting of approximately  
61.2358 U.S. Acres;

Parcel No. 3, Estate Diamond, consisting of approximately 6.9368  
U.S. Acres;

Parcel No. 2, Estate Diamond, consisting of approximately 6.5484  
U.S. Acres;

Road Plot No. 12, Estate Cane Garden, consisting of  
approximately 0.4252 U.S. Acres;

Road Plot No. 41, Estate Granard, consisting of approximately  
0.4255 U.S. Acres; and

Road Plot No. 6, Estate Diamond, of approximately 0.8510 U.S.  
Acres.

PLEASE TAKE FURTHER NOTICE that the above-captioned civil action touches upon  
and affects all of the Affected Real Property.

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Respectfully submitted,

**HAMM RHEA ECKARD, LLP**

Dated: July 31, 2017

By: *Campbell C. Rhea For*  
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- and -

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Counsel to Sixteen Plus Corporation

**RECEIVED**  
JUL 31 2017

RECORDER OF DEEDS-STX

